



2024

# GDPR & Privacy Notice



Damian Deal (Director)  
Vanquish Insulations UK Ltd  
06/08/2024

## PRIVACY POLICY

Vanquish Insulations UK Ltd provides services commercially and specialise in the design & installation of all forms of thermal insulation, trace heating, sheet metal cladding, acoustic insulation and passive fire protection. This privacy policy explains in a clear and succinct way, how we use any personal information we collect about you, either through using our website, or in any other way, verbally or in writing.

## TOPICS

- Data controller
- Basis for collecting your data (Lawful processing)
- Legitimate Interests
- Sensitive Information
- Categories of Personal Data
- Cookies
- Recipients of data
- Data transfers
- Retention policy
- Your Rights as a data subject
- Automated decision making

## DATA CONTROLLER

Vanquish Insulations UK Ltd as an organisation is a data controller and specifically, Damian Deal, a company director, is Vanquish Insulations UK Ltd.'s nominated Data Controller. Damian Deal can be contacted by email at [info@vanquishinsulation.com](mailto:info@vanquishinsulation.com) or telephone number 01277 840844.

## ON WHAT BASIS DO WE COLLECT & PROCESS YOUR DATA? (KNOWN AS LAWFUL PROCESSING)

We collect information about you our clients or prospective clients in order to process your order, manage your account and if you agree by consenting at point of collection, to email you about other products and services. We also collect information when you voluntarily complete customer surveys and provide feedback. Personal information is transferred as part of hosted cloud services (Microsoft Office 365 & SharePoint, BT & 123Reg email services, Dropbox, Site Audit Pro, and Clearbooks online accounting). The lawful basis on which we process your data is in the legitimate interests of Vanquish Insulations UK Ltd.

Personally Identifiable Information (PII) is also collected and processed in order to undertake the employment of staff. The lawful basis for this processing is also in the legitimate interest of Vanquish Insulations UK Ltd.

In identifying this 'Legitimate Interest' as the lawful basis, we have conducted a 'Legitimate Interest Assessment' in order to be satisfied that the interests of Vanquish Insulations UK Ltd do not override your own legitimate rights and freedoms.

Additionally, we collect PII for the purpose of engaging contractors and administering our contracts. In these processes, the lawful basis for processing has been established as the pursuance of a contract or to enter into a contract.

Each category of data subject is identified in our data inventory and the PII collected specified in detail along with the legal basis for processing and the retention period.

## LEGITIMATE INTERESTS

### Staff

Vanquish Insulations UK Ltd undertakes the processing of PII in relation to employees to ensure suitability for employment and to discharge any statutory responsibilities in relation to right to work, residency and HMRC requirements.

Both Vanquish Insulations UK Ltd and the employee benefit from this processing activity as it provides safeguards for Vanquish Insulations UK Ltd and facilitates employment for the Data Subject. If processing this data were not permitted, then the company could not operate and provide goods and services as well as not being able to offer employment opportunities.

### Clients

The processing of client data is undertaken in order to engage commercially and offer the most appropriate data privacy and compliance related service and products. In addition, we maintain an oversight of our clients to continue our support. Vanquish Insulations UK Ltd and the client benefit from this processing activity as it provides opportunities to establish and sustain commercial relationships and to provide the most focused advice for the benefit of the client. If processing this data were not permitted, then the company could not operate and provide services.

The data collected will not be used for any unlawful or unethical purpose.

## SENSITIVE INFORMATION

Vanquish Insulations UK Ltd does not process sensitive data.

## CATEGORIES OF DATA

Vanquish Insulations UK Ltd processes non-sensitive data. For our **staff** we process:

*Name / Address / Phone No. / Date of Birth / Gender / Signature / Driving Licence / Annual Leave / Disciplinary / NI No. / Tax / Bank Account / Pension Details / Utility Bill / Accreditations / CSCS Card / Photograph / CSCS Reg No. / DBS Check / Name (Emergency Contact) / Phone No. (Emergency contact) / Relationship (Emergency Contact)*

We process the following data of our **clients**:

*Name / Address (business) / Phone number / Email address(s) / Signature*

We process the following data of our **contractor staff**:

*Name / Address / Date of Birth / Phone No. / NI No. / UTR / Bank Account / Signature / Email Address / Name (Emergency Contact) / Phone No. (Emergency contact) / Relationship (Emergency Contact) / CSCS Details / Accreditations*

## COOKIES

Our website does not use 1<sup>st</sup> party or 3<sup>rd</sup> party cookies, we **do not** collect data from you during your interaction with our website.

## DATA RECIPIENTS

Any personal data we collect, hold and process is retained within our own company computers based in the UK and on our accounting platform, 'Clearbooks'. We use Microsoft 365 and SharePoint services based in a cloud environment. Microsoft reside the data in UK data centres. We share data with Hudson Contract Services, a UK based intermediary which provides contractor staff. Hudson are data controllers in their own right and their privacy policy can be viewed on their web site. We also use the services of accountants 'C R Bland Baker Limited' based in the UK, who also provide payroll processing services. Personally identifiable data may be used in the preparation of statutory accounts, and any mandatory HMRC and

Government requirements. Vanquish Insulations UK Ltd also use the mobile app 'Site Audit Pro' in order to share relevant and time critical information between members of staff and contractors 'on site'.

Vanquish Insulations UK Ltd also occasionally provide names and contact numbers of our staff to suppliers and customers, to deliver to our contract sites and arrange meetings.

Access to personal data is restricted to those who have a legitimate reason to retrieve it, e.g. company directors, managers and nominated individuals.

## DATA TRANSFERS

Personal Data is transferred to the EU by some of our data processors through their cloud service provision. This complies with the GDPR international transfers requirements.

## RETENTION POLICY

The data we collect directly from you is the minimum we require to facilitate the lawful processing described above. Personally Identifiable Data placed on our system will be deleted at 7 years in order to comply with legal and financial requirements. If you consent for us to process your data for the purpose of marketing, we will retain your contact details for as long as the consent lasts.

## YOUR RIGHTS AS A DATA SUBJECT

The regulations provide a number of rights to you as the Data Subject. Vanquish Insulations UK Ltd is committed to upholding those rights and those applicable to the personal information we collect and process are listed below.

In addition to these rights, you have the right to escalate any concern to the Supervisory Authority, which in the UK is the Information Commissioners Office <https://ico.org.uk>. A full and detailed explanation of all rights can be found at <https://ico.org.uk/for-the-public/>

- **The Right to be Informed** – you should be clear about what, why and in what way your personal information will be processed at the time it is processed. This privacy policy sets out that information
- **Right of Access** – you have the right to know what personal information is held, by whom and why. You can send a Subject Access Request to see what personal information and any supplementary information relating to you is held by us. We will provide you with the information we hold within one month of your request, unless the provision of that information is particularly complex. In which case, we may extend the deadline by a further two months. This information will be provided free of charge unless you require multiple copies of the same information, in these circumstances, we retain the right to charge a reasonable administrative fee.
- **The Right to Rectification** – If the information we have collected and processed is inaccurate or incomplete, you have the right to have it rectified. We will respond to your request for rectification within one month, unless the request is complex or multiple.
- **Right to Erasure** – You have the right to have your personal data erased and to prevent processing in some specific situations, these include:
  - Where personal data is no longer necessary regarding the purpose for which it was originally collected
  - When you withdraw consent
  - When you oppose the processing and there is no superseding legitimate interest for continuing the processing

- If the personal data was unlawfully processed (i.e. otherwise in breach of the GDPR)
  - If the personal data must be removed in order to comply with a legal obligation
  - If the personal data is processed in relation to the offer of information/ society services to a child.
- **Right to Restrict Processing** - If you contest the accuracy of the personal data we hold, we will restrict the processing of your data until accuracy is verified. The restriction of processing can occur for other reasons too, such as if you require us to retain your data in the advent of a legal claim.
  - **Right to Data Portability** – You have the right to move, duplicate or transfer your data easily from one IT environment to another in a safe and secure way, without hindrance to usability.

You also have the right to lodge a complaint with the UK's supervisory body, The Information Commissioners Office [www.ico.org.uk](http://www.ico.org.uk)

### **AUTOMATED DECISION MAKING**

Vanquish Insulations UK Ltd does not conduct any profiling or automated decision making.

### **OTHER WEBSITES**

Our website contains links to other websites. This privacy policy only applies to Vanquish Insulations UK Ltd, so if you follow a link to another website, you should read that organization's own privacy policy.

### **CHANGES TO OUR PRIVACY POLICY**

We keep our privacy policy under review and we will place any updates on our website. This privacy policy was last updated in June 2024. <https://www.vanquishinsulation.com/policies/gdpr-privacy-notice>

### **CYBER SECURITY POLICY**

Vanquish Insulations UK Ltd consider cyber security a major risk. Staff are trained in regard to these as detailed in our Cyber Security Policy to which they must agree. Please see our separate Cyber Security Policy, last updated in June 2024. <https://www.vanquishinsulation.com/policies/cyber-security-policy>

### **HOW TO CONTACT US**

You can write to us at this address:

Vanquish Insulations UK Ltd  
Unit 7 The Grange  
Stock Road, Stock  
Essex, CM4 9PH

You can telephone us on this number:

01277 840844

You can email us by using this address:

[info@vanquishinsulation.com](mailto:info@vanquishinsulation.com)

### **POLICY APPROVED**



Damian Deal (Director)  
06/08/2024