

At Apex Lifts we take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event that you have a complaint.

Key terms

We, us, our	Apex Lift & Escalator Engineers Ltd (Registered in England under number 01129631)
Personal information	Any information relating to an identified or identifiable individual
Special category personal information	Personal information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership Genetic and biometric data Data concerning health, sex life or sexual orientation

Personal information we collect about you

We may collect and use the following personal information about you:

- Your name and contact information, including email address, telephone number and company details.
- Information to enable us to check and verify your identity e.g. Your date of birth.
- Location data
- Your billing information, transaction and payment card information.
- Your personal or professional interests.
- Your contact history and purchase history
- Information to enable us to undertake credit or other financial checks on you.
- Information about how you use our website, IT, communication and other systems.

This personal information is required to provide products or services to you. If you do not provide personal information we ask for, it may delay or prevent us from providing such goods and services.

How your personal information is collected

We collect most of this personal information directly from you- in person, by telephone, or email and/or via our website. However, we may also collect information:

- From publicly accessible sources e.g. Companies House or HM Land Registry
- Directly for a third party e.g. credit reference agencies or credit due diligence providers.
- From a third party with your consent e.g. Bank or professional adviser
- Via our IT systems e.g. door entry systems, reception logs; and automated monitoring of our website and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, email and instant messaging systems.

How and why we use your personal information

Under data protection law, we can only use your personal data if we have good reasoning to do so e.g.:

- To comply with our legal and regulatory obligations
- For the performance of our contract with you or to take steps at your request before entering into a contract.
- For our legitimate interests or those of a third party.
- Or, where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal information for and our reasons for doing so.

What we use your personal information for	Our reasons
To provide products and services to you	For the performance of our contract with you or to take steps at your request before entering into a contract
To prevent and detect fraud against you or us	For our legitimate interests or those of a third party, i.e. to minimise fraud that could be damaging for us and for you
<p>Conducting checks to identify our customers and verify their identity</p> <p>Other processing necessary to comply with legal and regulatory obligations that apply to our business, e.g. under health and safety regulation</p>	To comply with our legal and regulatory obligations
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, e.g. policies covering security and internet use	For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price
Ensuring the confidentiality of commercially sensitive information	<p>For our legitimate interests or those of a third party, i.e. to protect trade secrets and other commercially valuable information</p> <p>To comply with our legal and regulatory obligations</p>
Statistical analysis to help us manage our business, e.g. in relation to our financial performance, customer base, or other efficiency measures	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price
Updating customer records	For the performance of our contract with you or to take steps at your request before entering into a contract

What we use your personal information for	Our reasons
	<p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our customers about existing orders and new products</p>
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	<p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you</p>
<p>Marketing our services to:</p> <ul style="list-style-type: none"> - existing and former customers. - third parties who have previously expressed an interest in our services. - third parties with whom we have had no previous dealings. 	For our legitimate interests or those of a third party, i.e. to promote our business to existing and former customers
Credit reference checks via external credit reference agencies	For our legitimate interests or those of a third party, i.e. to ensure our customers are likely to be able to pay for our products and services
External audits and quality checks, e.g. for ISO or Investors in People accreditation and the audit of our accounts	<p>For our legitimate interests or a those of a third party, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards</p> <p>To comply with our legal and regulatory obligations</p>

The above table does not apply to special category personal information, which we will only process with your explicit consent.

Promotional communications

We may use your personal information to send you updates (by email, text message, telephone or post) about our products and services, including exclusive offers and promotions.

We have a legitimate interest in processing your personal information for promotional purposes (see above **'How and why we use your personal information'**). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal information with the utmost respect and transfer it with other organisations [outside our corporate group] for marketing purposes.

You have the right to opt out of receiving promotional communications at any time by:

- Contacting us at info@apexlifts.com
- Using the 'unsubscribe' link in emails or 'STOP' number in texts.

We may ask you to confirm or update your marketing preferences if you instruct us to provide further products and services in the future, or if there are changes in the law, regulation, or the structure of our business.

Who we share your personal information with

We share personal information with:

- Third parties we use to help deliver our products and services to you, e.g. payment service providers, warehouses and delivery companies.
- Other third parties we use to help us run our business e.g. marketing agencies, website hosts and/or third-party payment providers.
- Credit reference agencies; and
- Our insurers, brokers and our bank.

We only allow our service providers to handle your personal information if we are satisfied, they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers relating to ensure they can only use your personal information to provide services to us and to you. We may also share personal information with external auditors.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulator obligations.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. The receipt of the information will be bound by confidentiality obligations.

Where your personal information is held

Information may be held at our offices and those of our group companies, third party agencies, service providers, representatives and agents as described above (see above: **'Who we share your personal information with'**).

[Some of these third parties may be based outside of the European Economic Area. For more information, including on how we safeguard your personal information when tis occurs, see below: **'Transferring your personal information out of the EEA'**].

How long your personal information will be kept

We will keep your personal information while you have an account with us or we are providing products and services to you. Thereafter, we will keep your personal information for as long as necessary:

- To respond to any questions, complaints or claims made by you or on your behalf.
- To show that we treated you fairly.
- To keep records required by law.

We will not retain your personal information for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of personal information.

Transferring your personal information out of the EEA

To deliver services to you, it is sometimes necessary for us to share your personal information outside of the European Economic Area (EEA), e.g.

- With our service providers located outside the EEA.
- If you are based outside the EEA.
- Where there is an international dimension to the services, we are providing to you.

These transfers are subject to special rules under European and UK data protection law. If you would like further information, please contact our Data Protection Lead (see **'How to contact us'** below).

Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal information (the right of access)
Rectification	The right to require us to correct any mistakes in your personal information
To be forgotten	The right to require us to delete your personal information - in certain situations
Restriction of processing	The right to require us to restrict processing of your personal information—in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party - in certain situations
To object	The right to object: - at any time to your personal information being processed for direct marketing (including profiling). - in certain other situations to our continued processing of your personal information, e.g. processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights under the General Data Protection Regulation.](#)

If you would like to exercise any of those rights, please:

- Email, call or write to our Data Protection Officer- see below: '**How to contact us**' and;
- Let us have enough information to identify you (e.g. your full name, address and reference number) and proof of your identity and address (a copy of your driving license or passport and a recent utility or credit card bill) and;
- Let us know what right you want to exercise and the information to which your request relates.

Keeping your personal information secure

We have appropriate security measures to prevent personal information from being accidentally lost, used or accessed unlawfully. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

How to complain

We hope that we can resolve any query or concern you may raise about our use of your information.

The [General Data Protection Regulation](#) also gives you right to lodge a complain with a supervisory authority, in particular the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

Changes to this privacy policy

This privacy notice was published on 02.06.20 We may change this privacy notice from time to time- when we do, we will inform you via our website.

How to contact us

Please contact us by post, email or telephone if you have any questions about this privacy policy or the information, we hold about you.

Our contact details are shown below.

GDPR Privacy Policy



Our contact details

Apex Lifts & Escalator Engineers Ltd
Art's House
Bank Lane
Bexley Heath
Kent DA6 7BH

info@apexlifts.com
0208 300 2929