



APEX LIFTS

GDPR POLICY

DECEMBER 2022

APEX LIFTS

a CAPITAL success

POLICY OUTLINE

Apex Lifts respects your privacy and takes the matter seriously. We comply with legal obligations under the General Data Protection Regulation 2018 (GDPR) and the Data Protection Act 2018 - protecting your rights surrounding the personal data we obtain as part of Apex Lift's day-to-day operations.

This policy outlines how and why we collect, store, process and use personal data and provides information to individual rights under data protection legislation.

In this policy 'we', 'us' and 'our' refers to Apex Lifts - the data controller.

This GDPR Privacy Policy was published December 2022. We may change this privacy notice from time-to-time, however when this is carried out, updated versions will be accessible via our website.

Contact Details:

Apex Lift & Escalator Engineers
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info@apexlifts.com
0208 300 2929



INTRODUCTION

KEY TERMS

- **Controller:** The organisation that collects personal data and decides how it will be used.
- **Processor:** The organisation that processes personal data on behalf of the controller.
- **Data Subject:** Any individual in the EU and/or from the EU whose personal data is being collected, stored or processed.
- **Personal Data:** Any information relating to an identified or identifiable individual.
- **Processing:** Any operation performed on personal data, including structuring, storing and analysing data.
- **Profiling:** Using personal data to analyse a person's preferences, interests, behaviour, location or movement.
- **Pseudonymisation:** Secure processing of personal data so no piece of data can be attributed to a data subject without the use of additional information which should be securely held separately. This is important during the unlikely event of a data security breach



COLLECTING & PROCESSING DATA

In order for Apex Lifts to operate and provide the best possible service we can, we collect personal data from the following sources:

- Those who access our website
- Those who obtain services from us
- Those who provide Apex Lifts with a service/product
- Those engaged by us
- Those who we have day-to-day communication/dealings with

We are committed to ensuring your personal data is used for the purpose outlined upon collection and does not invade on your privacy rights. The personal data we collect from each source can be found below:

Those who access our website:

Your personal data including your name, email address, telephone number and other contact information will be collected if you visit our websites, register to use the website (where registration is required), if you subscribe to one of our services, complete a 'contact us' form or request further services. We may also collect details of your visits to our websites including traffic data, location data and the resources that you access. We sometimes collect information about your computer including, where available, your IP address, operating system and browser type for the purpose of system performance and marketing. Our website uses cookies to distinguish you from other users. Our Cookie Policy can be viewed as a pop up on our website upon entry.

The above data is collected to ensure our website is performing well for your device, the content is tailored to your preferences and enables us to deliver products and services to you. If you have provided consent to personal data collection via our Cookie Policy, Contact Us form or email subscription, we may contact you.

Those who obtain services from us & provide to us:

We collect personal data from our customers and related individuals to provide our services or where an individual has otherwise consented. This may include statutory returns (legal and regulatory obligations), credit reference checks and billing purposes, to prevent or detect fraud, verification of customer identity, adhering to business policies (security), updating customer records, improving our service operations and service delivery to you. When receiving products/services, data will be collected and disclosed to Apex's approved third parties and supply chain - again to ensure you receive the best service possible.

Those engaged & have regular dealings with us:

Personal data will be collected directly from you, any organisation you represent, marketing or PR agencies or from databases and platforms which you have signed up to. We may use the data to market our services to existing and former customers, third parties who have previously expressed interest in our services and third parties with who we have had no previous dealings with.

COLLECTING, STORING & SHARING

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

- Publicly accessible sources (e.g. Companies House or HM Land Registry)
- Directly from a third party (e.g. credit reference agencies or customer due diligence providers)
- A third party with your consent (e.g. a bank or professional adviser)
- Our IT systems (e.g. door entry systems, reception logs AND via automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communication systems, email and instant messaging systems)

Information may be held at our offices, on our in-house database, by third party agencies/organisations and service providers. Some of the above third party suppliers may be based outside the European Economic Area (EEA). To deliver services to you, it is sometimes necessary for us to share your personal data outside of the EEA:

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

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 officer (see 'Introduction').

We have appropriate security measures (following pseudonymisation) to prevent personal data from being accidentally lost, used or accessed unlawfully. Those processing your data will do so only in unauthorised manner and are subject to a duty of confidentiality.

We also have a procedure 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.

We share your personal data with third parties we use to deliver our products and services to you e.g. payment service providers, warehouses and delivery companies. Additionally, other third parties we use to run our business e.g. website hosts, credit reference agencies, our insurers, brokers and bank.

We only allow our service providers to handle your personal data if we are satisfied they also take the appropriate measures to protect your information. Furthermore, we impose contractual obligations on service providers ensuring they can only use data to provide services to us; as a result, you.

Personal data may also be shared with other parties including, potential buyers of some or all of our business or during re-structuring. The recipient of the data will also be bound to confidentiality agreements.

BASIS FOR DATA PROCESSING

We will only process personal data where we have a lawful basis to do so. The lawful basis on which data is processed will depend on the nature of the information collected and the purposes for which it is used by us but will be one or more of following:

- Consent: you have provided your consent for us to process their personal data for a specific purpose.
- Contract: the processing is necessary for a contract you have with us or because you have asked us to take specific steps before entering into a contract.
- Legal obligation: the processing is necessary for us to comply with our legal obligations.
- Vital interests: the processing is necessary to protect someone's life.
- Legitimate interests: the processing is necessary for our legitimate interests or the legitimate interests of a third party.

We may use your personal data to send you updates (via 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 data for promotional purposes - this means we do not usually need your consent to send promotional communications to you. However, where consent is needed, we will ask for this consent separately and clearly.

You have the right to opt out of receiving promotional communications at any time by contacting us directly or unsubscribing and/or updating your marketing preferences via links provided in promotional communications e.g. email.

We will keep your personal data for the duration you have an account with us or we are providing products and services to you. Thereafter, we will keep your personal data for as long as necessary for the following purposes:

- 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
- To send promotional communications to you out of legitimate interest (existing, pre-existing or business enquiry made)

YOUR RIGHTS

- The right to be informed: upon data collection, subjects have the right to be told specifically what their data will be used for.
- The right to access: subjects can request what data is stored about them via an SAR (Subject Access Request). Organisations should respond to these as soon as possible, providing a full breakdown of the data stored.
- The right to rectification: subjects have the right to have their data edited or changed when requested.
- The right to erasure: also known as 'right to be forgotten'. Subjects can make a request for their data to be erased.
- The right to restrict processing: An individual can request and limit the way an organisation uses their data.
- The right to data portability: subjects can obtain data from a controller (organisation collecting and processing their data) and reuse this for their own purposes.
- The right to object: subjects have the right to object to their data being processed at any time.
- Rights in relation to automated decision making and profiling: subjects have the right not to be subject to a decision based off of profiling (segmenting) and automated data processing alone.

We hope that we can resolve any query or concern you may raise about the collection, storage, processing and use of your personal data.

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The GDPR also gives you the right to lodge a complaint with a supervisory authority, in particular in the European Union or European Economic Area where you work, normally reside or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner, who may be contacted by clicking [here](#) or via telephone: 030 3123 1113