

# PRIVACY & PERSONAL DATA PROTECTION POLICY





# DONNELLY

**PLUMBING AND HEATING CONTRACTORS  
ONE STOP HOME IMPROVEMENT CENTRE**

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## 1. Background

This privacy notice lets you know what happens to any personal data that you give to us, or any that we may collect from or about you. It applies to all products and services, and instances where we collect your personal data.

This privacy notice applies to personal information processed by or on behalf of Wm. Donnelly & Co Ltd.

### Changes to this privacy notice

We may change this privacy notice from time to time by updating this page in order to reflect changes in the law and/or our privacy practices. We encourage you to check this privacy notice for changes whenever you visit our website – <http://www.Donnellyuk.com/>.

### Wm. Donnelly & Co Ltd and our Data Protection Officer

We are Wm. Donnelly & Co Ltd, operating from 15 Law place, East Kilbride, G74 4QL and registered at 1 Cambuslang Court, Cambuslang, Glasgow, G32 8FH, we are both Data Processors and data controllers of your personal data.

We have a dedicated data protection officer (“DPO”). You can contact the DPO using the details below or by writing to the above operating address, marking it for the attention of the DPO or going to [Contact Us](#).

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## 2. What kinds of personal information about you do we process?

Personal information that we’ll process in connection with all of our products and services, if relevant, includes:

- **Personal and contact details**, such as title, full name, contact details and contact details history
- **Your date of birth, gender and/or age**
- **Your nationality**, if needed for the product or service
- **Details of beneficiaries**, such as joint policy holders, beneficiaries of our products or services
- **Family members** (if relevant to the product or service)
- **Records of your contact with us** such as via the phone number of our breakdown service and, if you get in touch with us online using our online services, details such as your mobile phone location data.
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- **Products and services** you hold with us, as well as have been interested in and have held and the associated payment methods used
- **The usage of our products and services**, any call outs and claims and whether those claims were paid out or not (and details related to this)
- **Marketing to you and analysing data**, including history of those communications, information about products or services we think you may be interested in, and analysing data to help target offers to you that we think are of interest or relevance to you. Offers may include but is not limited to our Plumbing services, Heating services, Electrical services, Joinery services and any of our other products and services
- **Boiler and/Heating information** about your Boiler/Heating (including assessing and predicting faults or issues),
- **Information about your use of products or services held with our business partners**, such as insurance policies, Breakdown services,
- **Information we obtained from third parties**, including information about insurance risk, pricing, claims history, instances of suspect fraud and usage history
- **Fraud, debt and theft information**, including details of money you owe, suspected instances of fraud or theft, and details of any devices used for fraud
- **Information about your health or if you are a vulnerable customer**
- **Information about your property**, such as location, value, number of rooms, property type and building work you've had done
- **Information about your employment status**, if relevant
- **Information about your property occupier status**, such as whether you are a tenant, live with parents or are an owner occupier of the property where you live at the time of your application
- **Your residency and/or citizenship status**, if relevant, such as your nationality, your length of residency in the UK and/or whether you have the permanent right to reside in UK
- **Your marital status, family, lifestyle or social circumstances**, if relevant to the product
- Where relevant, **information about any guarantor** which you provide in any application
- **Third party transactions**; such as where a person other than the account holder uses Wm. Donnelly & Co Ltd's breakdown service, information about that person and the transaction

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### 3. What is the source of your personal information?

We'll collect personal information from the following general sources:

- From you directly, and any information from family members, associates or beneficiaries of products and services
- Information generated about you when you use our products and services
- From a broker or other intermediary (for example, 3<sup>rd</sup> party website) who we work with to provide products or services or quote to you
- Boiler/Heating repair companies if you already have a product with them, have applied for one or have held a one previously
- Business partners (for example, financial services institutions, insurers), account beneficiaries, or others who are a part of providing your products and services or operating our business



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## 4. What do we use your personal data for?

We use your personal data, including any of the personal data listed in section 1 above, for the following purposes:

- Assessing an application for a product or service, including considering whether or not to offer you the product or service, the price, the risk of doing so, availability of payment method and the terms
  - Managing products and services relating to that the product or service, or application for one
  - Updating your records, tracing your whereabouts and recovering debt
  - Managing any aspect of the product or service
  - To make automated decisions on whether to offer you a product or service, or the price, payment method, risk or terms of it
  - To perform and/or test the performance of, our products, services and internal processes
  - To improve the operation of our business and that of our business partners
  - To follow guidance and best practice under the change to rules of governmental and regulatory bodies
  - For management and auditing of our business operations including accounting
  - To carry out checks at Credit Reference and Fraud Prevention Agencies pre-application, at application, and periodically after that
  - To monitor and to keep records of our communications with you and our staff (see below)
  - To administer our good governance requirements.
  - For market research and analysis and developing statistics
  - Assessing and profiling aspects of your required product (including faults)
  - For direct marketing communications and related profiling to help us to offer you relevant products and service, including deciding whether or not to offer you certain products and service. We'll send marketing to you by, email, phone, post, social media and digital channels (for example, using Facebook), offers may relate to any of our products and services such as boilers, heating and/or plumbing assistance, Electrical services, Joinery services, as well as to any other offers and advice we think may be of interest
  - To provide personalised content and services to you, such as tailoring our products and services, our digital customer experience and offerings, and deciding which offers or promotions to show you on our digital channels
  - To develop new products and services and to review and improve current products and services
  - To comply with legal and regulatory obligations, requirements and guidance
  - To provide insight and analysis of our customers as part of providing products or services, helping us improve products or services, or to assess or improve the operating of our businesses
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## 5. What are the legal grounds for our processing of your personal information (including when we share it with others)?

We rely on the following legal bases to use your personal data:

1. **Where it is needed to provide you with our products or services**, such as:
  - a) Assessing an application for a product or service you hold with us, including consider whether or not to offer you the product, the price, the payment methods available and the conditions to attach
  - b) Managing products and services you hold with us, or an application for one
  - c) Updating your records, tracing your whereabouts to contact you about your account and doing this for recovering debt (where appropriate)
  - d) Sharing your personal information with business partners and services providers when you apply for a product to help manage your product
  - e) All stages and activities relevant to managing the product or service including enquiry, application, administration and management of accounts, setting up/changing/removing guarantors
  
2. **Where it is in our legitimate interests to do so**, such as:
  - a) Managing your products and services relating to that, updating your records, tracing your whereabouts to contact you about your account and doing this for recovering debt (where appropriate)
  - b) To perform and/or test the performance of, our products, services and internal processes
  - c) To follow guidance and recommended best practice of government and regulatory bodies
  - d) For management and audit of our business operations including accounting
  - e) To carry out searches at Credit Reference Agencies pre-application, at the application stage, and periodically after that. Where you have been introduced to us by a broker or other intermediary they may do these searches on our behalf
  - f) To carry out monitoring and to keep records of our communications with you and our staff (see below)
  - g) To administer our good governance such as internal reporting and compliance obligations or administration required for AGM processes
  - h) For market research and analysis and developing statistics
  - i) For direct marketing communications and related profiling to help us to offer you relevant products and services, including deciding whether or not to offer you certain products and service. We may send marketing to you by email, phone, post and social media and digital channels (for example, using Facebook).
  - j) Subject to the appropriate controls, to provide insight and analysis of our customers to business partners either as part of providing products or services, helping us improve products or services, or to assess or to improve the operating of our businesses
  - k) For some of our profiling and other automated decision making



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l) Where we need to share your personal information with people or organisations in order to run our business or comply with any legal and/or regulatory obligations

3. To comply with our **legal obligations**
4. With your **consent or explicit consent**:
  - a) For some direct marketing communications
  - b) For some of our profiling and other automated decision making
  - c) For some of our processing of special categories of personal data such as about your health, if you are a vulnerable customer or some criminal records information

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## 6. When do we share your personal information with other organisations?

We may share information with the following third parties for the purposes listed above:

- Business partners (for example, financial services institutions, insurers), account beneficiaries, or others who are a part of providing your products and services or operating our business
- Governmental and regulatory bodies such as HMRC, the Financial Conduct Authority, the Prudential Regulation Authority, the Ombudsman, the Information Commissioner's Office and under the Financial Services Compensation Scheme
- Other organisations and businesses who provide services to us such as debt recovery agencies, back up and server hosting providers, IT software and maintenance providers, document storage providers and suppliers of other back office functions
- Credit Reference and Fraud Prevention Agencies (see below)
- Market research organisations who help us to develop and improve our products and services

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## 7. How and when can you withdraw your consent?

Where we're relying upon your consent to process personal data, you can withdraw this at any time by contacting us using the details below.

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## 8. Is your personal information transferred outside the UK or the EEA?

We're based in the UK but sometimes your personal information may be transferred outside the European Economic Area. If we do so we'll make sure that suitable safeguards are in place, for example by using approved contractual agreements, unless certain exceptions apply.

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## 9. How do we share your information with credit reference agencies?

To process your application, we'll perform credit and identity checks on you with one or more credit reference agencies (**CRAs**). Where you take cover via a credit service from us we may also make periodic searches at CRAs to manage your account with us. To do this we'll supply your personal information to CRAs and they will give us information about you. This will include information from your credit application and about your financial situation and financial history. CRAs will supply to us both public (including the electoral register) and shared credit, financial situation and financial history information and fraud prevention information.

We'll use this information to:

- Assess your creditworthiness and whether you can afford to take the product
- Verify the accuracy of the data you have provided to us
- Prevent criminal activity, fraud and money laundering
- Manage your account(s)
- Assess payment methods available to you
- Trace and recover debts
- Make sure any offers provided to you are appropriate to your circumstances

We'll continue to exchange information about you with CRAs while you have a relationship with us. We'll also notify the CRAs about your settled accounts. If you borrow and don't repay in full and on time, CRAs will record the outstanding debt. This information may be given to other organisations by CRAs. **The identities of the CRAs, their role as fraud prevention agencies, the data they hold, the ways in which they use and share personal information, data retention periods and your data protection rights with the CRAs are explained in more detail on our website.**

When CRAs receive a search from us they will place a search footprint on your credit file that may be seen by other lenders.

If you're making a joint application, or tell us that you have a spouse or financial associate, we'll link your records together, so you should make sure you discuss this with them, and share with them this information, before lodging the application. CRAs will also link your records together



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and these links will remain on your and their files until such time as you or your partner successfully files for a disassociation with the CRAs to break that link.

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## 10. How do we share your information with Fraud Prevention Agencies?

To learn more about how credit reference and fraud agencies use your personal data [please contact us](#).

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## 11. What should you do if your personal information changes?

You should tell us so that we can update our records using the details in the [Contact Us](#) section of our website. We'll then update your records if we can.

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## 12. Do you have to provide your personal information to us?

We're unable to provide you with our products or services if you do not provide certain information to us. In cases where providing some personal information is optional, we'll make this clear.

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## 13. Do we do any monitoring involving processing of your personal information?

In this section monitoring means any: listening to, recording of, viewing of, intercepting of, or taking and keeping records (as the case may be) of calls, email, text messages, social media messages, in person (face to face) meetings and other communications.

We may monitor where permitted by law and we'll do this where the law requires it, or to comply with regulatory rules, to prevent or detect crime, in the interests of protecting the security of our communications systems and procedures and for quality control and staff training purposes. This information may be shared for the purposes described above.



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## 14. What about other automated decision making?

We sometimes make decisions about you using only technology, where none of our employees or any other individuals have been involved. For instance, we may do this to decide: whether to offer you a product or service, to determine the risk of doing so, the price we will offer, whether to offer you credit, what terms and conditions to offer you, assess lending, business risks, or to assess what payment methods we can offer you. We may also do this using data from other parts of Wm. Donnelly & Co Ltd records, including product or services details (including usage of them).

We'll do this where it is necessary for entering into or performing the relevant contract, is authorised by laws that apply to us, or is based on your explicit consent.

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## 15. For how long is your personal information retained by us?

Unless we explain otherwise to you, we'll hold your personal information based on the following criteria:

- For as long as we have reasonable business needs, such as managing our relationship with you and managing our operations
- For as long as we provide goods and/or services to you and then for as long as someone could bring a claim against us; and/or
- Retention periods in line with legal and regulatory requirements or guidance.

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## 16. What are your rights under data protection laws?

Here is a list of the rights that all individuals have under data protection laws. They don't apply in all circumstances. If you wish to use any of them, we'll explain at that time if they are engaged or not. The right of data portability is only relevant from May 2018.

- The right to **be informed** about the processing of your personal information
- The right to have your personal information **corrected if it is inaccurate** and to have **incomplete personal information completed**
- The right to **object** to processing of your personal information
- The right to **restrict processing** of your personal information
- The right to **have your personal information erased** (the "right to be forgotten")
- The right to **request access** to your personal information and to obtain information about how we process it



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- The right to **move, copy or transfer your personal information** (“data portability”)
- Rights in relation to **automated decision making which has a legal effect or otherwise significantly affects you**

You have the right to complain to the Information Commissioner’s Office which enforces data protection laws: <https://ico.org.uk/>. You can also contact us using the details below.

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## 17. Your right to object

You have the right to object to certain purposes for processing, in particular to data processed for direct marketing purposes and to data processed for certain reasons based on our legitimate interests. You can contact us by going to the [Contact Us](#) section of our website to exercise these rights.

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## 18. What are your marketing preferences and what do they mean?

We may use your home address, phone numbers, email address and social media or digital channels (for example, Facebook, Google and message facilities in other platforms) to contact you according to your marketing preferences. You can stop our marketing at any time by contacting us using the details below or by following the instructions in the communication.

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## 19. Contact Us

If you have any questions about this privacy notice, or if you wish to exercise your rights or contact the DPO, you can contact us by going to the [Contact Us](#) section of our website ([WWW.DONNELLYUK.COM](http://WWW.DONNELLYUK.COM)). Alternatively, you can write to Wm. Donnelly & Co Ltd, 15 Law place, East Kilbride, G74 4QL marking it for the attention of the DPO.