

<b>Fancy Flooring Ltd</b>	<b>Author: Director of Operations</b>	<b>Dated: 1<sup>st</sup> May 2018</b>
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## Revision History

Date	Nature of Change	Section	Revision	Originator

### 1.0 Introduction

1.1 This document has been designed using the guidance procedures provided by the Information Commissioners Office (ICO) and in relation to the statutory requirements with regards our obligations to the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679). For information purposes, Fancy Flooring Ltd is registered as a data controller with the ICO under registration number ZA417129.

1.2 We are committed to safeguarding the privacy of our customers, be it through direct communication or via our public website. Fancy Flooring Ltd is committed to upholding the eight recognised Data Protection Principles. Any and all data submitted to Fancy Flooring Ltd will be held in accordance with the 1998 Data Protection Act and held in secure domains at all times.

1.3 Our principal form of business is the Supply and Installation of flooring. Our registered office address is Fancy Flooring Ltd 8 Woods Terrace Murton Co. Durham SR79AA and is the address to which all formal communication should be addressed. Our website address is [www.holstagroup.com](http://www.holstagroup.com). Our main contact number is 0191 447 3620 and our responsible person is John Cooper to all formal communication and relevant enquiries should be addressed.

### 2.0 Data Provided Via Contractual Client Relationships

2.1 In all our contractual client dealings, it is explicitly stated that it is the responsibility of the client to seek authorisation for Fancy Flooring Ltd Ltd to use the personal data to fulfil its obligations in respect of the scope of works and unless otherwise instructed, Fancy Flooring Ltd will assume this permission has been sought and given if an authorised sales orders received.

2.2 Fancy Flooring Ltd will only ever transfer minimal client data to any location - in accordance with Data Protection Principle 2 ("Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes"). Furthermore, Fancy Flooring Ltd warrants to The Client (and its employees submitting personal data) that it shall:

2.2.1 Only process Personal data in accordance with The Client's instructions and to fulfil our obligations in respect of the scope of works of any agreement and make no other use of it without express permission.

2.2.2 Take appropriate technical and organisational measures against unauthorised or unlawful processing of The Client's Personal data and against accidental loss or destruction of, or damage to,

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Personal data as necessary to enable it to process the Personal data in compliance with obligations equivalent to those imposed on a Data Controller by the Seventh Principle of the Act.

- 2.2.3 Not do or permit anything to be done through act or omission which would cause The Client to incur any liability under the Act or any other applicable data protection laws and regulations (or any legislation or regulations from time to time amending or replacing the same), including without limitation all laws intended to implement the Data Protection Directive (95/46/EC) (referred to as "data protection laws").
- 2.3 Fancy Flooring Ltd agrees that, outside of the tools used to fulfil the services contracted with us, it shall not engage any third party to process of The Client's Personal data unless. The Client has provided express written consent AND
- 2.3.1 The third party selected has provided sufficient guarantees in respect of the technical and organisational measures governing the processing to be carried out, and
- 2.3.2 The third party has entered into a written contract with Fancy Flooring Ltd which imposes on the third-party obligations identical to those imposed on Fancy Flooring Ltd under the data protection clauses within any given agreement
- 2.4 Fancy Flooring Ltd shall not transfer personal information or data outside the European Economic Area without The Client's prior written consent unless Fancy Flooring Ltd and the recipients of such personal data have entered into the standard contractual clauses (in relation to controller-to-processor transfers) annexed to the Commission Decision of February 2010 on standard contractual clauses for transfer of personal data to processors established in third countries (2010/87/EU).
- 2.5 Fancy Flooring Ltd has and will continue to take all reasonable steps, in accordance with all relevant legal responsibilities, to ensure the reliability of any of its employees which will have access to the personal data of The Client. If Fancy Flooring Ltd receives any complaint, notice, request (including any subject access request) or communication which relates directly or indirectly to the processing of the Personal Data or to either party's compliance with Data Protection Laws, we shall immediately notify The Client (deemed to be acting thereafter on behalf of its employee) in writing and Fancy Flooring Ltd shall provide The Client with all reasonable assistance in relation to the same.
- 3.0 Data Retention Policy Guiding Principles
- 3.1 Information Held
- 3.1.1 Fancy Flooring Ltd has and maintains two registers of data held.
- 3.1.2 The first covers data we hold in order to conduct our business i.e. that of our customers. It is held in the following document: "GDPR Register External – Fancy Flooring Ltd vxx.docx"
- 3.1.3 The second covers employee data. This is held in an excel document that is entitled "GDPR Register Internal – Fancy Flooring Ltd vxx.docx"
- 3.1.4 These documents are updated at least once a year as will testify the revision history. The owner of these documents is the Managing Director who is also acting responsible person for Fancy Flooring

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### 3.2 Information Collected

3.2.1 Fancy Flooring Ltd may collect, store and use the following kinds of personal data:

3.2.2 Information about your computer and about your visits to and use of our services including our website and client facing technology

3.2.3 Information relating to any transactions carried out in order us to fulfil requests in association with our defined scope of works

3.2.4 Information that you provide to us for the purpose of registering your personal profile and for access to our technology

3.2.5 Any other information that you choose to send to us which is pertinent to the scope of works for which we are contracted or for the fulfilment of personal requests – this

3.2.6 Information may extend in this instance to family members

### 3.3 Cookies

3.3.1 We reserve the right to use cookies on our website. A cookie is a text file sent by a web server to a web browser, and stored by the browser. The text file is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser. All internet browsers allow you to refuse to accept cookies but restricting our access may have a negative impact upon the usability of many websites.

### 3.4 Disclosures

3.4.1 In addition to the disclosures outlined within this policy we may disclose information about you:

3.4.2 To the extent that we are required to do so by law

3.4.3 In connection with any legal proceedings or prospective legal proceedings

3.4.4 In order to establish, exercise or defend our legal rights - including providing information to others for the purposes of fraud prevention and reducing credit risk

### 4.0 Individual Rights

#### 4.1 The right to be informed

4.1.1 For corporate customers; all information about processing of data is provided in the terms of the contract or formal trading agreement which they receive, review and sign. Additionally, the basis of processing and all details are provided on the ICO (Information Commissioner's Office) website.

#### 4.1.2 The right of access and rectification

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- 4.1.3 Fancy Flooring Ltd is a Data Processor and process data for the purposes of providing its services. The Data is controlled by the customer. Our principal form of business is supply and installation of flooring to businesses and we also we also offer services for private individuals.
- 4.1.4 Employees can request to see all personal data via their line manager. Employees are entitled to maintain and change this data as they wish as long as it is legally correct i.e. matches passports etc.
- 4.2 The right to erasure
- 4.2.1 For Corporate Entities erasure typically happens in the following situations:
- 4.2.2 “Customer” provides an email with the instruction to “delete” the employee
- 4.2.3 “Customer” provides written instruction to a Company Director to delete an employee’s data
- 4.2.4 All Customer employees are deleted once the customer has left Fancy Flooring Ltd as per the data retention policy. (Data Retention Policy Document available upon request)
- 4.3 The right to restrict processing
- 4.3.1 For Corporate Entities: Fancy Flooring Ltd is an “agent” of the customer and therefore will have gathered all necessary permissions prior to contract commencement and provision of their employee data. Any objection to processing data needs to be raised with the contractors contact – typically the line manager or nominated contact - who will liaise with their local HR.
- 4.3.2 The right not to be subject to automated decision-making. At time of creation of this document, Fancy Flooring Ltd does not utilize automated decision making in any of its processes. Should this change, Fancy Flooring Ltd will always provide an opt-out capability and will also review any objections within the framework provided in GDPR.
- 5.0 Subject access requests
- 5.1 This should be in writing and preferably electronically i.e. email or scan of PDF request. If another format is requested, then this will be dealt with within 30 days of receipt in a meaningful format dictated by Fancy Flooring Ltd.
- 6.0 Data Breaches
- 6.1 Fancy Flooring Ltd is ISO 27001 & PCI-DSS compliant and has a documented incident management process. More details are available as per ISO 27001 upon request. Guidance on when and how to report a data breach are documented by the ICO – Fancy Flooring Ltd are committed and capable of meeting these.
- 7.0 Data Protection by design
- 7.1 Fancy Flooring Ltd is ISO 27001 Certified. These standards provide best practice for data protection. More details are available for each in their respective documentation locations.

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8.0 Third Party Websites

8.1 We are not responsible for the privacy policies or practices of third party websites which may be entered directly from within our various client facing technologies.

9.0 Policy Amendments

9.1 We reserve the right to update this privacy policy from time-to-time and will post the most up- to-date version on our website at any given time without announcement.