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## 1. Visitors to our website

This privacy policy applies to personal information about:

- Visitors to our website.
- Customers who purchase goods or services or create an account with us.
- Our suppliers.

### 1.1. What is personal information?

Personal information is any information relating to an individual who can be identified directly or indirectly, often by name, account number, location, an online identifier, or other factors specific to their identity.

Personal information may include “special category data” relating to racial or ethnic origin, political opinions, religious beliefs, membership of a trade union, physical or mental health and criminal records and allegations.

As a rule, we do not collect “special category data” about visitors to our website or our customers or suppliers. The exception is where we identify suspected criminal activity such as fraudulent claims or the use of stolen payment card details. In this case we will record details of the suspected criminal activity and may take appropriate action, including refusing to accept orders, make payments or give refunds. We may also report the incident to the relevant bank or payment card issuer or to the police or other appropriate authorities.

See below for details of how we may use your personal information.

### 1.2. The personal information we collect about you and how we use it.

#### (ii) Website Visitors: The personal information we collect about you and how we use it

You can visit and browse our website without providing your name or contact details. Like many websites, our server logs capture details of your operating system, browser software, IP (Internet Protocol) address and Uniform Resource Locator (URL), including the date and time of your visit.

We use cookies to analyse how our site is used by visitors and to provide some of the functionality. You may choose to provide your contact details (name, address, business, job title, email address, telephone number) if you do any of these things:

- Sign up to a mailing list
- Submit a query or request a quote or other information
- Ask to be contacted by us
- Create an account or log in to a secure area

Separate terms and conditions may apply when you open an account so, please make sure that you read them at the relevant time.

#### (iii) Customers: The personal information we collect about you and how we use it

If you purchase products or services from us, we may use your personal information in the following ways:

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- to respond to your enquiries;
- to keep you informed about our products and services;
- to process your order and to follow up on orders that are not completed;
- to arrange visits to your premises (e.g. to carry out a survey or installation);
- to manage your account, including carrying out identity checks where relevant;
- to manage your credit account (if applicable) including carrying out credit checks;
- for market research purposes;
- to publish trends and/or to improve usefulness and content of our website;
- to track activity on our site and to send you the most relevant information about our products and service;
- to link with social media sites and services, for example, for advertising purposes;
- to notify you about important changes or developments to our site or services;
- to manage deliveries, returns and refunds;
- for product liability purposes;
- to deal with enquiries and complaints;
- for claims management and insurance purposes; and
- for record keeping purposes.

#### (iv) Suppliers: The personal information we collect about you and how we use it

If you supply products or services to us, we may use your personal information in the following ways:

- for order processing and management;
- to manage deliveries, installations, returns and refunds;
- for product liability purposes;
- to manage your account, including conducting credit and other background checks where applicable;
- for market research purposes;
- to notify you about important changes or developments to our websites or services;
- for supply chain management;
- to deal with enquiries and complaints;
- for claims management and insurance purposes; and
- for record keeping purposes.

If you are a supplier and you have any questions about how we use your personal information, please contact us.

## 2. Further information on how we use personal data.

### 2.1. Personal Information

#### 1. Contact details

Name, address, business, job title, email address, telephone number, location.

- Responding to enquiries

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- Account management
- Managing marketing preferences
- Personalising advertising
- Market research, surveys and advertising
- Website security and tracking website use
- Linking with social media services

## 2. Order details

Contact details, products, services, date & time of order/visit/delivery, delivery details, delivery addresses, delivery photographs, survey or installation details including photographs, payment method, payment details, refunds, claims, surveys and feedback.

- Order processing and fulfilment
- Deliveries, returns, refunds
- Quality assurance
- Account management
- Customer analysis and research
- Market research, surveys and advertising
- Product liability
- Handling enquiries and complaints
- Claims and insurance purposes
- Fraud prevention and detection

## 3. Account details

Contact details, passport/driving licence or other identity documents, order details, business type, sector, payment history, account status, purchase history and trends.

- Account management
- Following up incomplete transactions
- Handling queries
- Identity verification
- Customer analysis and research
- Market research, surveys and advertising
- Payment and debt management

## 4. Credit Account details

Contact details, credit reference checks, order details, payment history, account status, credit limit.

- Account management
- Verification of identity and credit rating
- Handling queries
- Payment and debt management

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In order to process your application, we will supply your personal information to credit reference agencies (CRAs) and they will give us information about you, such as about your financial history. We do this to assess creditworthiness and product suitability, check your identity, manage your account, trace and recover debts and prevent criminal activity. We will also continue to exchange information about you with CRAs on an ongoing basis, including about your settled accounts and any debts not fully repaid on time. CRAs will share your information with other organisations. The identities of the CRAs, and the ways in which they use and share personal information, are explained in more detail at <http://www.experian.co.uk/crain/index.html>

## 2.2. Keeping You Informed

If you sign up to receive email updates or have bought or enquired about our products or services, we may use the information we collect to let you know about our other products and services which may be of interest to you and to keep you updated with information about promotional offers and what is coming soon.

We review the products and services you buy and we also analyse your use of our website and the searches you make on this and other websites. We use this information to tailor the marketing you receive from us so it is as relevant as possible. This may include serving you with adverts on social media and other third party websites.

You can opt out of receiving marketing communications from us at any time. You can also opt out of receiving marketing which is tailored to suit your customer profile. See **Your Rights** below for more details.

## 2.3. Call Recording

Some telephone calls may be recorded or monitored, for example calls to our customer services teams. Call recording and monitoring may be carried out for the following purposes:

- training and quality control;
- as evidence of conversations; and/or
- for the prevention or detection of crime (e.g. fraudulent claims).

## 2.4. Legal Basis for Processing

Some of the information we collect is provided by you voluntarily (and therefore with your permission), for example when you sign up to join a mailing list or submit a query.

If you purchase items from us, or if you supply products or services to us, most of the information we collect is necessary so that we can fulfil the contract between us.

The remainder of the information is collected for our legitimate business purposes, which include:

- To keep in touch with current, past and prospective customers
- To provide online account management and related services
- To gain an understanding of how our customers interact with us so we can provide the most relevant products and services
- To monitor the use of our website and improve its facilities

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- To identify suspected criminal activity and take appropriate action
- To manage our supply chain and the relationship with our supplier.
- To protect and defend our rights

When we collect personal information from you, we will indicate whether it is mandatory or voluntary – this is done on the website by using asterisks to mark mandatory fields.

## 2.5. Retention

We will retain your personal information for as long as needed for the legitimate business purposes described above.

If you are a visitor to the website, we will retain your information for a limited period in order to respond to your query, provide you with the information you require or to send you updates on our products and services for as long as you indicate that you are happy for us to do so.

If you make a one-off purchase, we normally keep records of the transaction for 7 years. If you are an account customer or a supplier, we normally keep records for 7 years after the closure of your account or the last purchase or sale you made. In all cases, this is for accounting, tax and product liability purposes.

Your information may be retained for longer than this if there are valid legal grounds for us to do so, for example if required by law or court order, or as needed to defend or pursue legal claims.

## 2.6. Working with Service Providers

Like most organisations, we engage service providers to run our website and IT systems, to help us administer accounts, to conduct credit checks and fraud screening, and to handle postal and email marketing campaigns. We also work with a number of suppliers who provide products and services to us.

We will only provide these companies with the information they need to deliver the service we have engaged them for and they are prohibited from using that information for any other purpose. Whenever we share personal information about our customers or visitors to our website with our service providers, we will put in place contracts which require the service provider to protect the information and keep it secure. See also **Transferring information to other countries** below.

## 2.7. Other Disclosures

Your personal data may be disclosed to the following third parties for the purposes described above:

- tax, customs and excise authorities
- regulators, courts and the police
- fraud screening agencies
- central and local government
- insurance companies
- other professional advisors

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We may also disclose your personal information if we believe that the disclosure is necessary to enforce or apply our terms and conditions or otherwise protect and defend our rights, property or the safety of our customers and other users of the website.

We may disclose and/or transfer your personal information in connection with a reorganisation of all or part of our business, if the majority of our shares are bought by another company or if we transfer all or some of our assets to another company.

## 2.8. Transferring information to other countries

Some of the companies who provide services to us may be located outside the United Kingdom. We use IT service providers who are located in the US, for example. As a result, your personal information may be transferred outside the UK. We will ensure that those service providers comply with any legal requirements that apply to the transfer of personal information outside the UK, including, where appropriate, requiring the service provider to sign the approved European Commission Standard Contractual Clauses for the transfer of personal data to third countries.

## 2.9. Security

We are committed to safeguarding the personal information you provide to us. We use appropriate measures to protect the information that you submit through our website and the information we collect and store about our customers.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of information you submit via our website and any transmission is at your own risk. Once we have received your information, we will take appropriate technical and organisational measures to safeguard your personal data against loss, theft and unauthorised use, access or modification.

If you have created an account or registered to use any online services, your account details may be password protected. It is your responsibility to keep your password confidential and to sign out once you have finished browsing.

## 2.10. Changes to this policy

Any changes to this privacy policy will be posted here.

## 2.11. Links to other websites

Links may be provided on our website to other websites that are not operated by us. If you use these links, you will leave our website. You should note that we are not responsible for the contents of any third-party website. External sites will have their own privacy policies which you should read carefully.

## 2.12. Your Rights

### 1. Marketing

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If you have an online account you can access, update and correct your personal information, including your marketing choices using the account management facilities.

You can opt out of receiving emails or text marketing at any time by using the unsubscribe option in the message.

## 2. Access and Correction

If you would like to correct or update any of your other personal information, or if you would like a copy of the personal information we hold, please contact the Total Clean Air Data Protection Officer at the address below. We may need to ask for proof of your identity before we can respond to your request.

## 3. Other Rights

You may also have the following rights in relation to your personal information:

- in certain circumstances, the right to restrict or object to the processing of your personal information, or request that your personal information is deleted
- where you have provided personal information voluntarily, or otherwise consented to its use, the right to withdraw your consent
- in certain circumstances, the right to receive a copy of the personal information which you have provided to us, in a structured, commonly used and machine-readable format or to request that we transfer that information to another party (known as “data portability”)
- the right to complain to a Data Protection Authority (see further below)
- If you have a query about this privacy policy or wish to exercise your rights, please contact Total Clean Air’s Data Protection Officer by writing to them at:

Total Clean Air Ltd, Units 1-4 Gravenchon Way, Street, Somerset BA16 0HW

Or emailing them at:

[info@totalcleanair.com](mailto:info@totalcleanair.com) (marking emails for the attention of the Data Protection Officer)

If you are not satisfied with our use of your personal information or our response to any request made by you in relation to your personal information, you have a right to make a complaint to the Information Commissioner:

Information Commissioner’s Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545745 (national rate)

Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

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### 3. Amendments

4. Amendments Changes to this manual may only be completed by authorised members of staff. Amendments shall appear in **red text** and be highlighted by a line in the right-hand margin adjacent to the altered or added text.
5. When changes are made, Table 0.1 is to be completed detailing the pages that have been discarded and replaced, and the section(s) affected.
6. In instances that the manual requires restructure or significant content amendments throughout, the entire manual may be discarded and re-issued as the next version number.
7. A record of each amendment shall be kept within TCA007 – Internal Procedure Amendments.
8. Previous pages/versions must be discarded by copy holders as per table 0.1. The Quality Manager is responsible for notifying all relevant staff members of the changes via email.

Version	Amendment		Discard			Insert		
	Number	Date	Section	Page	Revision	Section	Page	Revision

The above amendments have been examined, agreed, and authorised for issue by the Quality Manager and Operations Director

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