



**PRIVACY POLICY**



## PRIVACY POLICY

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<https://www.ableuk.co.uk> (“**our website**”) is operated by Able Plumbing Solutions Ltd, a private limited company incorporated and registered in England and Wales with company number 08029215, whose registered office is at The Stable Yard Vicarage Road, Stony Stratford, Milton Keynes, Bucks, MK11 1BN, trading as Able Plumbing Solutions (“**we**”, “**us**”, “**our**”).

“**Personal Data**” or “**Personal Information**” means any information about an individual from which that person can be identified. It does not include “**Anonymous Data**” where the identity has been removed. Able Plumbing Solutions respects your privacy and is committed to protecting your Personal Data. This policy explains how we look after your Personal Data when you visit our website and informs you about your privacy rights.

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**BY CONTINUING TO BROWSE OUR WEBSITE, YOU ARE AGREEING TO OUR PRIVACY POLICY**

### CONTENTS

1. *Introduction*
2. *Controller*
3. *The Data we Collect About You*
4. *How Your Personal Data is Collected*
5. *Third Party Links*
6. *Purposes for Which We Will Use Your Personal Data*
7. *Change of Purpose*
8. *Disclosures of Your Personal Data*
9. *Marketing and Promotional Offers*
10. *Our Use of Cookies*
11. *Data Security*



12. *Data Retention*
  13. *Your Legal Rights*
  14. *Requesting Access to Your Personal Data*
  15. *General*
- 

## **1. INTRODUCTION**

- 1.1 Our Privacy Policy was last updated on 13/01/23. By browsing our website, you confirm that you agree to our policy. If you do not agree, you must not use our website.
- 1.2 It is important that you read this Privacy Policy, together with any other privacy policy or fair processing policy that Able Plumbing Solutions may provide on specific occasions when collecting or processing Personal Data about you, so that you are fully aware of how and why we are using your data. This Privacy Policy supplements other notices and policies and is not intended to override them.
- 1.3 We keep our Privacy Policy under regular review and may make changes from time to time. Every time you use our website, please check to ensure that you understand the policy that applies at that time.

## **2. CONTROLLER**

- 2.1 Able Plumbing Solutions is the controller and is responsible for your Personal Data.
- 2.2 We have appointed a data protection officer (“**DPO**”) who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy or our privacy practices, including any requests to exercise your legal rights, please contact the DPO using the details set out below:
  - 2.2.1 The DPO: Jamie Wooton.
  - 2.2.2 Email address: [Jamie.wooton@ableuk.co.uk](mailto:Jamie.wooton@ableuk.co.uk)
- 2.3 It is important that the Personal Data we hold about you is accurate and current. Please keep Able Plumbing Solutions informed if your personal information changes during your



relationship with us.

- 2.4 You have the right to make a complaint at any time to the Information Commissioner's Office ("ICO"), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). Our ICO registration number is 00019663725. We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

### 3. THE DATA WE COLLECT ABOUT YOU

- 3.1 Able Plumbing Solutions may process your Personal Data without your knowledge or consent where this is required or permitted by law.
- 3.2 We may collect, use, store, and transfer different kinds of Personal Data about you which we have grouped together as follows:
  - 3.2.1 "**Identity Data**" such as your full name, or similar identifier; your marital status, title, date of birth, and gender.
  - 3.2.2 "**Contact Data**" such as your billing address, delivery address, email address, and telephone numbers.
  - 3.2.3 "**Financial Data**" such as your bank account and payment card details.
  - 3.2.4 "**Technical Data**" includes your internet protocol address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website.
  - 3.2.5 "**Usage Data**" includes information about how you use our website, and services.
  - 3.2.6 "**Marketing and Communications Data**" such as your preferences in receiving Marketing from Able Plumbing Solutions and our third parties, and your communication preferences.
- 3.3 We do not collect, use, store, or transfer the following kinds of Personal Data about you:
  - 3.3.1 "**Special Categories of Personal Data**" such as details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, health, and genetic and biometric data, nor do we collect any information about criminal convictions and offences.



3.3.2 Our website is not intended for anyone under the age of 18. We do not knowingly collect data relating to children. If you are a parent or guardian and you are aware that your child has provided us with Personal Data, please contact us to remove such information from our servers.

#### **4. HOW YOUR PERSONAL DATA IS COLLECTED**

4.1 Able Plumbing Solutions use different methods to collect data from and about you:

4.1.1 You may give us your Identity, Financial, and Contact Data through direct interactions. For example, by filling in forms or by corresponding with us by post, phone, email, or otherwise. This includes Personal Data you provide when you:

4.1.1.1 Apply or make an enquiry for our services.

4.1.1.2 Make a purchase or use our services.

4.1.1.3 Upload your business resume or CV.

4.1.1.4 Create a user account on our website.

4.1.1.5 Subscribe to our service, or mailing list, or publications.

4.1.1.6 Request Marketing to be sent to you.

4.1.1.7 Enter a competition, promotion, or survey

4.1.1.8 Visit our social media platforms.

4.1.1.9 Give us feedback.

4.1.1.10 Contact us via any method.

4.1.2 We may collect Personal Data through automated technologies and interactions. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions, and patterns. This Personal Data is collected by using cookies, server logs, and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.

4.1.3 We will receive Personal Data about you from various third parties and public sources, as set out below:

4.1.3.1 Analytics providers based in England and Wales, such as, but not limited to, Google.



- 4.1.3.2 Contact, Financial, and Transaction Data from providers of payment services, who are based in England and Wales, such as, but not limited to, Commusoft, and Xero.

## 5. THIRD PARTY LINKS

- 5.1 Our website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you.
- 5.2 We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## 6. PURPOSES FOR WHICH WILL USE YOUR PERSONAL DATA

- 6.1 Able Plumbing Solutions will only use your Personal Data when the law allows us to. Most commonly we will use your Personal Data in the following circumstances:
  - 6.1.1 Where we need to perform a contract we are about to enter into or have entered into with you, or to take steps at your request before entering into such a contract (**"Performance of a Contract"**).
  - 6.1.2 Where it is necessary for the interest of our business or those of a third party in conducting and managing our business, to enable us to give you the best service and the best and most secure experience (**"Legitimate Interests"**), and your interests and fundamental rights do not override those interests. We always consider your rights and balance any potential impact on you (both positive and negative) before we process your Personal Data for Legitimate Interests. We do not use your Personal Data for activities where our interests are overridden by the impact on you unless we have your consent or are otherwise required or permitted to by law. You can contact us to obtain further information about how we assess our Legitimate Interests against any potential impact on you in respect of specific activities.
  - 6.1.3 Where it is necessary for compliance with a legal obligation that we are subject to



**(“Comply with a Legal Obligation”).**

6.1.4 To form a view on what content may be relevant for you by using your Identity, Contact, Technical, and Usage Data (**“Marketing”**).

6.1.5 We may use your Identity, Contact, and Marketing and Communications Data to add you to our mailing list.

6.2 Where we need to collect Personal Data by law or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you, and as a result, Able Plumbing Solutions may be unable to provide you with a service. In this case, we may have to cancel any service you have with us, but we will notify you if this is the case at the time.

6.3 The table below sets out a description of all the ways Able Plumbing Solutions plan to use your Personal Data and which of the legal bases we rely on to do so. We have also identified what our Legitimate Interests are where appropriate. Please note that we may process your Personal Data for more than 1 lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your Personal Data, where more than 1 ground has been set out in the table below.

<b><u>Purpose/Activity</u></b>	<b><u>Type(s) of Data</u></b>	<b><u>Lawful Basis for Processing (Including Basis of Legitimate Interest)</u></b>
To register you as a new user or customer.	(a) Identity Data (b) Contact Data	1. Performance of a Contract with you.



<p>To process and deliver your order including:</p> <ul style="list-style-type: none"><li>• Manage payments, fees, and charges.</li><li>• Collect and recover money owed to us.</li></ul>	<p>(a) Identity Data (b) Contact Data (c) Marketing and Communications Data (d) Financial Data</p>	<ol style="list-style-type: none"><li>1. Performance of a Contract with you.</li><li>2. Necessary for our Legitimate Interests (to recover debts due to us).</li></ol>
<p>To manage our relationship with you, which will include:</p> <ul style="list-style-type: none"><li>• Notifying you about changes to our terms or website policies.</li><li>• Asking you to leave a review or take a survey.</li><li>• Managing your profile and contact preferences.</li><li>• Following up with you as a possible lead where you have submitted your contact details.</li><li>• Contacting you to respond to your queries or to resolve issues pertaining to your order, delivery, or the technical description.</li></ul>	<p>(a) Identity Data (b) Contact Data (c) Marketing and Communications Data</p>	<ol style="list-style-type: none"><li>1. Performance of a Contract with you.</li><li>2. Necessary to Comply with a Legal Obligation.</li><li>3. Necessary for our Legitimate Interests (to keep our records updated and to study how customers use our services).</li></ol>
<p>To enable you to partake in a prize draw, competition, or complete a survey.</p>	<p>(a) Identity Data (b) Contact Data (c) Usage Data (d) Marketing and Communications Data</p>	<ol style="list-style-type: none"><li>1. Performance of a Contract with you.</li><li>2. Necessary for our Legitimate Interests (to study how customers use our services, to develop them, and grow our business).</li></ol>



<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting, and hosting of data).</p>	<p>(a) Identity Data (b) Contact Data (c) Technical Data</p>	<ol style="list-style-type: none"><li>1. Necessary for our Legitimate Interests (for running our business, provision of administration and IT services, network security, to prevent fraud, and in the context of a business re-organisation, or group restructuring exercise).</li><li>2. Necessary to Comply with a Legal Obligation.</li></ol>
<p>To deliver relevant website content and advertisements to you, and measure or understand the effectiveness of the advertising we serve to you.</p>	<p>(a) Identity Data (b) Contact Data (c) Usage Data (d) Marketing and Communications Data (e) Technical Data</p>	<ol style="list-style-type: none"><li>1. Necessary for our Legitimate Interests (to study how customers use our services, to develop them, to grow our business, and to inform our Marketing strategy).</li></ol>
<p>To use data analytics to improve our website services, Marketing, customer relationships, and experiences.</p>	<p>(a) Technical Data (b) Usage Data</p>	<ol style="list-style-type: none"><li>1. Necessary for our Legitimate Interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business, and to inform our Marketing strategy).</li></ol>
<p>To make suggestions and recommendations to you, about goods or services that may be of interest to you.</p>	<p>(a) Identity Data (b) Contact Data (c) Technical Data (d) Usage Data (e) Marketing and Communications Data</p>	<ol style="list-style-type: none"><li>1. Necessary for our Legitimate Interests (to develop our services and grow our business).</li></ol>

To promote you for appropriate roles by sharing your business resume or CV and application information with recruiters.	(a) Identity Data (b) Contact Data (c) Profile Data	1. Performance of a Contract with you.
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## 7. CHANGE OF PURPOSE

- 7.1 Able Plumbing Solutions will only use your Personal Data for the purposes for which it was collected, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to know how the processing for the new purpose is compatible with the original purpose, please contact our DPO.
- 7.2 If we need to use your Personal Data for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so.

## 8. DISCLOSURES OF YOUR PERSONAL DATA

- 8.1 For the purposes set out in the table shown in clause 6, Able Plumbing Solutions may share your Personal Data with third parties, including:
- 8.1.1 Internal third parties acting as joint controllers or processors, including, but not limited to:
    - 8.1.1.1 Contractors or consultants acting as employees from time to time, who may be employed if and when they are required in order for us to provide our services to you.
    - 8.1.1.2 External third parties acting as processors or joint controllers, including, but not limited to:
      - 8.1.2.1 Service providers acting as processors, who are based Worldwide and provide services including, without limitation, providing job management software.
      - 8.1.2.2 Professional advisors acting as processors or joint controllers, including (without limitation) accountants who are based in England and Wales and

provide services including, but not limited to, accounting services.

- 8.1.2.3 Regulators and other authorities acting as processors or joint controllers, who are based in England and Wales, and require reporting of processing activities in certain circumstances, such as (for illustration) Gas Safe Register.
  - 8.1.2.4 Third party cloud-based services and IT and website support, for example, Saunders Digital.
  - 8.1.2.5 Third party users of our website acting as joint controllers or processors, for example recruiters or end-hirers who may be interested in your business resume or CV. Please remove your business resume or CV from your account if you do not wish for Personal Data provided in these documents to be shared with third party users.
  - 8.1.2.6 Development or investor companies or sole traders, and any other property related business acting as processors or joint controllers.
  - 8.1.3 Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business then the new owners may use your Personal Data in the same way as set out in this Privacy Policy.
- 8.2 We require all third parties to respect the security of your Personal Data and to treat it in accordance with the law. We do not allow our third-party service providers to use your Personal Data for their own purposes, and only permit them to process your Personal Data for specified purposes and in accordance with our instructions.
- 8.2.1 For example, if you are a recruiter or end-hirer in receipt of another user's CV or business resume, you acknowledge and accept that you are acting as a controller or processor in connection with any Personal Data obtained. It is your responsibility to comply with your obligations as a controller and to satisfy the legal grounds for processing any Personal Data. In particular, recruiters and end-hirers shall only contact the owner of a CV or business resume in respect of the relevant advertisement posted and shall take appropriate security measures (including physical, electronic, and procedural measures) to help safeguard such Personal Data from unauthorised access,



loss, and destruction.

8.3 We do not transfer your Personal Data outside the European Economic Area.

## **9. MARKETING AND PROMOTIONAL OFFERS**

9.1 Able Plumbing Solutions strive to provide you with choices regarding certain Personal Data uses, particularly around Marketing and advertising. Generally, we do not rely on consent as a legal basis for processing your Personal Data, although we will get your express opt-in consent before sharing your Personal Data with a third party for Marketing purposes, and before sending third party direct Marketing communications to you via email or text message.

9.2 You have the right to withdraw consent to Marketing at any time by refusing cookies or emailing [contact247@ableplumbingservices.co.uk](mailto:contact247@ableplumbingservices.co.uk).

9.3 You will receive Marketing communications from Able Plumbing Solutions if you have requested information from us or purchased services from us and you have not opted out of receiving that Marketing.

9.4 Where you opt-out of receiving these Marketing messages, this will not apply to Personal Data provided to us as a result of a service purchase, warranty registration, service experience, or other transactions.

9.5 We may, from time to time, contact you via social media messaging channels for the purposes of seeing if you are interested in using our services. It is lawful for us to do this according to the UK's Privacy and Electronic Communications Regulations ("PECR"). You can ask us to stop at any time, either directly via the social media communications channel or by contacting us.

## **10. OUR USE OF COOKIES**

10.1 You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly.

10.2 For more information about the cookies we use, please see our Cookies Policy: [\[INSERT LINK TO COOKIES POLICY\]](#).



## **11. DATA SECURITY**

- 11.1 Able Plumbing Solutions have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, altered, disclosed, or used or accessed in an unauthorised way.
- 11.2 In addition, we limit access to your Personal Data to those employees, agents, contractors, and other third parties who have a business need-to-know. They will only process your Personal Data on our instructions and are subject to a duty of confidentiality.
- 11.3 We have put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator of any breach where we are legally required to do so.

## **12. DATA RETENTION**

- 12.1 Able Plumbing Solutions will only retain your Personal Data for as long as reasonably necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements.
- 12.2 We may retain your Personal Data for a longer period in the event of a complaint, or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.
- 12.3 To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data; the potential risk of harm from unauthorised use or disclosure of your Personal Data; the purposes for which we process your Personal Data and whether we can achieve those purposes through other means; and the applicable legal, regulatory, tax, accounting, or other requirements.
- 12.4 By law, we must keep basic information about our customers (including Contact, Financial and Identity Data) for tax purposes, for 6 years after they cease being customers.
- 12.5 In some circumstances, you can ask us to delete your data. See clause 13 for further information in relation to your legal rights.
- 12.6 In some circumstances, we will anonymise your Personal Data (so that it can no longer be associated with you) for research or statistical purposes. In which case, we may use this



information indefinitely without further notice to you.

### **13. YOUR LEGAL RIGHTS**

13.1 Under certain circumstances, you have rights under data protection laws in relation to your Personal Data, specifically:

13.1.1 You have the right to request access to your Personal Data (commonly known as a **“Data Subject Access Request”**). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.

13.1.2 You have the right to request correction of your Personal Data. This enables you to have corrected any incomplete or inaccurate data we hold about you, though we may need to verify the accuracy of the new data you provide to us.

13.1.3 You have the right to request erasure of your Personal Data. This enables you to ask us to delete or remove any Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have successfully exercised your right to object to processing, where we may have processed your information unlawfully, or where we are required to erase your Personal Data to comply with local law. Please note that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you at the time of your request.

13.1.4 You have the right to object to processing of your Personal Data where we are relying on a Legitimate Interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Data for direct Marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

13.1.5 You have the right to request restriction of processing your Personal Data. This enables you to ask us to suspend the processing of your Personal Data in the following scenarios:



13.1.5.1 If you want us to establish the data's accuracy.

13.1.5.2 Where our use of the data is unlawful, but you do not want us to erase it.

13.1.5.3 Where you need us to hold the data, even if we no longer require it, as you need it to establish, exercise, or defend legal claims.

13.1.5.4 You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

13.1.6 You have the right to request transfer of your Personal Data to you or a third party. We will provide to you or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Please note, this right only applies to automated information which you initially provided consent for us to use, or where we used the information to perform a contract with you.

13.1.7 You have the right to withdraw consent where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case, at the time you withdraw your consent

13.2 If you wish to exercise any of the rights set out above, please contact our DPO.

#### **14. REQUESTING ACCESS TO YOUR PERSONAL DATA**

14.1 You will not have to pay a fee to access your Personal Data or to exercise any of the other rights. However, Able Plumbing Solutions may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

14.2 Able Plumbing Solutions may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data, or to exercise any of your other rights. This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

14.3 We try to respond to all legitimate requests as soon as possible. However, it could take us



longer if your request is particularly complex or you have made several requests. In this case, we will notify you and try to keep you updated.

## **15. GENERAL**

15.1 If any provision or part provision of this Privacy Policy becomes invalid, illegal, or unenforceable, this shall not affect the validity and enforceability of the rest of this policy. If it comes to the attention of either party that any provision or part provision of this Privacy Policy is invalid, illegal, or unenforceable, the parties shall negotiate in good faith to amend such provision so that, as amended, it is legal, valid, and enforceable.

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