



## Privacy Policy

JLM Utilities has drawn up this Privacy Policy to comply with GDPR.

### Introduction

This document refers to personal data, which is defined as information concerning any living person that is not already in the public domain.

The General Data Protection Regulation (GDPR) seeks to protect and enhance the rights of data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU. It should be noted that GDPR does not apply to information already in the public domain.

### What you need to know:

#### Q. Do we collect personal data?

A. Yes

#### Q. Why do we collect information?

A. The personal data we collect comes from different sources, including parties such as estate agents, commercial and domestic clients, and private customers who contact us directly. We collect information so that we can carry out work requests, provide quotations and invoices, make payments etc. Our reasons for collecting data will usually fall within the following lawful reasons as defined by the ICO (Information Commissioner's Office):

**(a) Consent:** the individual has given clear consent for you to process their personal data for a specific purpose.

**(b) Contract:** the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.

**(c) Legal obligation:** the processing is necessary for you to comply with the law (not including contractual obligations).

**(d) Vital interests:** the processing is necessary to protect someone's life.

**(e) Public task:** the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.



**Q. How long do we keep data for?**

**A.** We do not pass data onto third parties for marketing or sales purposes and we do not do any direct marketing. Therefore, any data we store will be for tax purposes, regulatory purposes or accurate record keeping in case of future contact from and with clients. In some cases, we are required to keep records for a minimum of 7 years as set out by our regulatory body WIAPS. Your rights under GDPR mean that you can request that we remove or amend any data we hold about you.

**Q. How do we store data?**

**A.** In several ways including digital e.g. email, spreadsheets, laptops, USB & cloud storage and paper. Wherever possible we will try to keep only a digital copy of data but in some cases, there will be paper copies of data for example Minor Works Certificates which include Names and Addresses. All reasonable measures have been taken to ensure that the data we store is secure.

**Q. When do we destroy data?**

**A.** Where it is not necessary for us to store paper copies of data such as quotes, letters, invoices etc we will destroy these securely by using companies which provide certificates of destruction and we will also delete and destroy data that it is no longer necessary for us to keep by auditing our records periodically.

**Our Policy:**

**Who do we collect data from?**

Estate Agents, commercial and domestic customers, private clients.

**Who do we process or pass data to?**

Estate Agents – who we have ongoing contracts with who require reports, certificates, letters, quotations, invoices etc

Regulatory bodies- we are WIAPS registered and we are required legally to notify them of any notifiable work carried out at individual properties. They also require that we retain paper copies of certificates such as minor works certificates for a period of a minimum of 7 years.

Suppliers – We inform suppliers of addresses so that goods can be delivered for us to complete work required



### **What data do we collect?**

Names  
Landlord names  
Tenant names  
Addresses  
Phone Numbers  
Email addresses

We do not knowingly collect data about children or minors.

### **What data do we process or pass on to others?**

WIAPS – as our regulatory body we are required to inform them of names, addresses and details of water supply work carried out.

### **What about data stored on paper?**

WIAPS certificate includes Names, Addresses & water supply works carried out

Quotes/invoices include Names, Address & descriptions of works to be carried out/ completed

Drain survey report includes Names & Addresses and description of drainage system

All the above-mentioned documents we keep paper copies of for a minimum of 7 years in case of inspection or enquiry.

### **Estate Agents:**

Works orders include Names, Addresses, Contact Numbers & details of job requests

### **Labourers, Trades People & Suppliers:**

Bank details  
Invoices  
Addresses

**We will always aim to keep paper copies down to minimum and only retain these when it is necessary for legal reasons, tax purposes or for record keeping.**



### **What about data stored online or digitally?**

We receive data by email, letter, phone calls and verbally from clients. Emails are kept so that we have a record of communication should any queries arise.

#### **Estate Agents:**

Names  
Addresses  
Contact numbers  
Email addresses

#### **Labourers, Trades People & Suppliers:**

Names  
Addresses  
Invoices  
Bank details  
Email addresses  
Contact numbers

#### **Other details stored digitally:**

Invoices  
Names  
Addresses  
Letters  
Quotations  
Scanned documents such as completed certificates of electrical work carried out  
Invoices from labourers and other trades people

#### **Why do we collect personal data?**

Where we are authorised by clients such as Estate Agents, Commercial customers, we collect information so that we can contact tenants, landlords, management and staff, other staff members to carry out work requests. We do not collect data from any sources such as direct marketing or sales. We store data received so that we have a record of work requested, quoted, completed and invoiced. We also store certain data for tax purposes.

We do not knowingly collect data about children and minors.



### **When do we collect data?**

**Estate Agents, Commercial & Domestic Clients:** When authorised to complete plumbing/drainage work on behalf of tenants, landlords and staff, usually in the form of a works order but also by email or verbally

**Suppliers:** When we received invoices from them for jobs completed

**Private customers:** When contacted by email, letter or verbally, we collect data so that we can provide quotations, invoices, reports, letters, and certificates and keep you up to date with progress

### **When do we process data?**

When we have explained to the customer that we are unable to complete work requested due to time constraints or the job is not within our field and where we know a reliable trade's person who can complete the job

When we send scanned documents such as certificates to the customer e.g. Estate Agents, Private Customer etc

When we must notify WIAPS of work carried out at a property

When we need to order supplies from our suppliers and we ask them to deliver to a property address  
To carry out work required

### **When do we delete or destroy data?**

Upon request and where it is no longer necessary to keep copies of records, we will destroy or delete data in a timely manner

### **Where do we store data?**

Paper documents  
Laptops & USB storage  
Email  
Cloud storage  
Spreadsheets  
Scanned documents



### **Where do we collect data from?**

Email, verbally, phone calls and letters

### **How do we store data?**

As above, mainly digital storage as we aim to keep paper copies to a minimum for security. All reasonable measures have been taken to make sure data is stored securely e.g. password protection. When we send emails, we have taken reasonable precautions to make sure that any attached files are virus free however we send emails in the knowledge that the Internet is not 100% secure and therefore although we employ virus protection it is always advised that the recipient also has adequate protection in place to scan any attachments before opening them as we cannot 100% guarantee that attachments are virus free.

### **How can a request for personal data held by us be made?**

By email, letter or phone call – please see **Contacts** details.

We will respond to any requests as soon as possible and no later than a month from receiving the request.

Data will be sent to you in the form of email, letter, and spreadsheet or PDF documents.

### **How can a request for data to be destroyed or amended be made?**

By email, letter or phone call – please see **Contacts** for details.

We will respond to any requests as soon as possible and no later than a month from receiving the request.

We would request that you keep your details up to date with us as failure to do so may mean that we are unable to complete work requested or delays in fulfilling requests.

### **How long do we keep data for?**

In some cases, we are obligated to keep documents such as WIAPS Certificates for a minimum of 7 years for inspection. Other reasons we would keep data would be tax purposes, keeping track of jobs authorised, jobs completed, and invoices issued and paid. We do periodical audits of records we keep and destroy data where it is no longer necessary to keep it or destroy paper documents where we have the data stored in digital format.



**JLM Utilities**

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**Contacts:**

If you wish to contact us, please use the following details:

*JLM Utilities*

*76 Middlewich Rd*

*Northwich*

*Cheshire*

*CW9 7DA*

*jwarburton@jlmutilities.co.uk*

*07455149018*

For more information about your rights please visit the ICO website [ICO.org.uk](http://ICO.org.uk)