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	Issued by: ACDC Register	Date Issued: 22/05/2018	Version No: 2.2		

Introduction

Optimum Heating Ltd “the Company” needs to gather and use certain information about individuals.

These can include customers, suppliers, business contacts, employees and other people the organisation has a relationship with or may need to contact.

This policy describes how this personal data must be collected, handled and stored to meet the company’s data protection standards — and to comply with the law.

1. Your personal data – what is it?

- “Personal data” is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address, or address).
- Identification can be by the personal data alone or in conjunction with any other personal data. The processing of personal data is governed by legislation relating to personal data which applies in the United Kingdom including the General Data Protection Regulation (the “GDPR”) and other local legislation relating to personal data and rights such as the Human Rights Act.

2. Company information

This Privacy Policy is provided to you by the Company, which is the data controller for your data.

3. What personal data is collected?

- Names, titles, and aliases, photographs;
- Contact details such as telephone numbers, addresses, and email addresses;
- Where they are relevant to the services provided by the Company, or where you provide them to us, we may process demographic information such as gender, age, marital status, nationality, education/work histories, academic/professional qualifications, hobbies, family composition, and dependants;
- Where you pay for activities or services, financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers;
- The personal data we process may include sensitive or other special categories of personal data such as criminal convictions, racial or ethnic origin, mental and physical health, details of injuries, medication/treatment received, political beliefs, trade union affiliation, genetic data, biometric data, data concerning and sexual life or orientation.

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4. The Company will comply with data protection law. This says that the personal data we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept and destroyed securely including ensuring that appropriate technical and security measures are in place to protect your personal data to protect personal data from loss, misuse, unauthorised access and disclosure.

5. We use your personal data for some or all of the following purposes:

- To deliver services including to understand your needs to provide the services that you request and to understand what we can do for you and inform you of other relevant services;
- To confirm your identity to provide some services;
- To contact you by post, email, telephone or using social media (e.g. Facebook);
- To help us to build up a picture of how we are performing;
- To prevent and detect fraud and corruption and where necessary for the law enforcement functions;
- To enable us to meet all legal and statutory obligations and powers including any delegated functions;
- To carry out comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practice from time to time with the aim of ensuring that all children and adults-at-risk are provided with safe environments and generally as necessary to protect individuals from harm or injury;
- To promote the interests of the Company;
- To maintain our own accounts and records;
- To seek your views, opinions or comments;
- To notify you of changes to our facilities, services, events and staff, and role holders;
- To send you communications which you have requested and that may be of interest to you. These may include information about campaigns, appeals, other new projects or initiatives;

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- To process relevant financial transactions including payments for goods and services supplied to the Company
- To allow the statistical analysis of data so we can plan the provision of services.

6. What is the legal basis for processing your personal data?

- The Company has certain powers and duties. Most of your personal data is processed for compliance with a legal obligation which includes the discharge of the Company's statutory functions and powers. Sometime when exercising these powers or duties it is necessary to process personal data of residents or people using the Company's services. We will always take into account your interests and rights. This Privacy Policy sets out your rights and the Company's obligations to you in detail.
- We may also process personal data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract.
- Sometimes the use of your personal data requires your consent. We will first obtain your consent to that use.

7. Sharing your personal data

- The Company will implement appropriate security measures to protect your personal data. We will inform you about any third parties with whom the Company will share your personal data. These third parties also have an obligation to put in place appropriate security measures and will be responsible to you directly for the manner in which they process and protect your personal data.
- Our agents, suppliers and contractors. For example, we may ask a commercial provider to publish or distribute newsletters on our behalf, or to maintain our database software;

8. How long do we keep your personal data?

- We will keep some records permanently if we are legally required to do so. We may keep some other records for an extended period of time. For example, it is current best practice to keep financial records for a minimum period of 8 years to support HMRC audits or provide tax information. We may have legal obligations to retain some data in connection with our statutory obligations. The Company is permitted to retain data in order to defend or pursue claims. In some cases the law imposes a time limit for such claims (for example 3 years for personal injury claims or 6 years for contract claims). We will retain some personal data for this purpose as long as we believe it is necessary to be able to defend or pursue a claim. In general, we will endeavour to keep data only for as long as we need it. This means that we will delete it when it is no longer needed.

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9. Your rights and your personal data

- You have the following rights with respect to your personal data:
 - (a) The right to access personal data we hold on you
 - (b) The right to correct and update the personal data we hold on you
 - (c) The right to have your personal data erased
 - (d) The right to object to processing of your personal data or to restrict it to certain purposes only
 - (e) The right to data portability
 - (f) The right to withdraw your consent to the processing at any time for any processing of data to which consent was obtained
 - (g) The right to lodge a complaint with the Information Commissioner's Office. You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.
- When exercising any of the rights listed above, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.
- At any point you can contact us to request the personal data we hold on you as well as why we have that personal data, who has access to the personal data and where we obtained the personal data from. Once we have received your request, we will respond within 30 days.
- There are no fees or charges for the first request but additional requests for the same personal data or requests which are manifestly unfounded or excessive may be subject to an administrative fee.

10. Further processing

If we wish to use your personal data for a new purpose, not covered by this Privacy Policy, then we will provide you with a Privacy Notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

11. Changes to this policy

We keep this Privacy Policy under regular review and we will place any updates on our corporate web page.

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12. Contact Details

Please contact us if you have any questions about this Privacy Policy or the personal data we hold about you or to exercise all relevant rights, queries or complaints

REVIEWED			
Signed	<i>NHarris</i>	Date	11/04/2025
Name	Natalie Harris	Position	Operations Director