

# Data Protection Policy

Last updated	08/04/2021
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## Definitions

<b>Company</b>	GPF Lewis PLC
<b>GDPR</b>	means the General Data Protection Regulation.
<b>Responsible Person</b>	means Systems & Infrastructure Manager
<b>Register of Systems</b>	means a register of all systems or contexts in which personal data is processed by the Company.

### 1. Data protection principles

The Company is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the



GDPR in order to safeguard the rights and freedoms of individuals; and

- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

## **2. General provisions**

- a. This policy applies to all personal data processed by the Company.
- b. The Responsible Person shall take responsibility for the Company’s ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. The Company shall register with the Information Commissioner’s Office as an organisation that processes personal data.

## **3. Lawful, fair and transparent processing**

- a. To ensure its processing of data is lawful, fair and transparent, the Company shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to the Company shall be dealt with in a timely manner.

## **4. Lawful purposes**

- a. All data processed by the Company must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).
- b. The Company shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Company’s systems.

## **5. Data minimisation**

- a. The Company shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.



## 6. Accuracy

- a. The Company shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

## 7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, the Company shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.

## 8. Security

- a. The Company shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

## 9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Company shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

END OF POLICY



# Privacy Policy

This privacy policy sets out how GPF Lewis PLC ("we", "us" or "our") uses and protects any information that you give to us when you use this website.

We are committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy statement.

For the purposes of the Data Protection Act 2018 and the General Data Protection Regulation ((EU) 2016/679) ("GDPR") and all successor legislation to the Data Protection Act 2018 and the GDPR (the "Data Protection Legislation"), the data controller is GPF Lewis PLC (company number 05991387 of GPF Lewis House, Old's Approach, Tolpits Lane, Watford, Wd18 9AB.

We may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from 30/05/2019.

## Information you give us

This is information about you that you give us by filling in forms on our website or by corresponding with us by phone, e-mail or otherwise. This can include information you provide to us when completing our enquiry form; register for our newsletters, enter a competition, promotion or survey; when you report a problem with our site; and when you give us feedback.

The information you give us may include:

- name and job title
- contact information including email address & telephone number
- demographic information such as postcode, preferences and interests
- other information relevant to you enquiry/the product or service you are interested in.
- Your preferred method of being contacted.

## Information we collect about you

When you visit our website we may automatically collect the following information:



- Technical information, including the IP (Internet Protocol) address used by your computer to connect you to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit, including the full Uniform Resource Locators (URL), clicks through our site (including date and time), services or properties you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

We may also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

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 (for example, to provide you with services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### **What we do with the information we gather**

We will only use your personal data when the law allows us to. We will use your data to understand your needs and provide you with a better service, and in particular for the following reasons:

- To contact you to discuss your request.
- Internal record keeping.
- We may use the information to improve our products and services.
- If you subscribe to our Newsletter, we may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided.
- From time to time, we may also use your information to contact you for market research purposes. We may contact you by email, phone, fax or mail. We may use the information to customise the website according to your interests.



## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your identity, contact details, usage data, technical data and marketing preferences to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which properties and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us and you have not opted out of receiving that marketing.

We will get your express opt-in consent before we share your personal data with any company outside of our group for marketing purposes.

If you would prefer not to receive any particular information from us, please inform us of this by sending us an appropriate email clearly explaining this to [info@gpflewis.co.uk](mailto:info@gpflewis.co.uk), write to us at GPF Lewis House, Old's Approach, Tolpits Lane, Watford, Wd18 9AB. You can ask us or third parties to stop sending you marketing messages by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of any transaction or contract entered into between you and us.

## Change of purpose

We will only use your personal data for the purposes for which we collected it, 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 get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to



safeguard and secure the information we collect online. 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 they are subject to a duty of confidentiality.

However, the transmission of information via the internet is never completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **Retention**

We will only retain your personal information for as long as is necessary to carry out the purpose for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 requirements.

In some circumstances we may 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.

## **Your rights / Controlling your personal information**

Under the Data Protection Legislation, you may be entitled to the following rights:

Where you have provided your consent to the processing of your personal data for any purpose, you have the right to withdraw such consent at any time by contacting us at [info@gpflewis.co.uk](mailto:info@gpflewis.co.uk), write to us at GPF Lewis House, Old's Approach, Tolpits Lane, Watford, Wd18 9AB.

You can ask us to rectify any inaccuracies in the personal information that we hold about you.

You can request the erasure of personal information that we hold about you where there is no good reason for us to continue processing it, 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.

You can object to our processing of your personal data where we are relying on a legitimate interest (or that 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.

You have the right to restrict our processing of your personal data (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

You can request a copy of your personal data from us in a commonly used and machine-readable format or that we transmit your personal data to another data controller.

You have the right to access information held about you. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

You can exercise any of the above rights at any time by contacting us at [info@gpflewis.co.uk](mailto:info@gpflewis.co.uk), write to us at GPF Lewis House, Old's Approach, Tolpits Lane, Watford, Wd18 9AB.

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so. We may use your personal information to send you promotional information about third parties which we think you may find interesting if you tell us that you wish this to happen.

### **How we use cookies**

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.





We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website. Please see our Cookie Policy for more information about the Cookies we use and your options for whether they are used or not.

### **Links to other websites**

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

### **Contact**

Questions, comments and requests regarding this privacy policy are welcomed and should be emailed to [info@gpflewis.co.uk](mailto:info@gpflewis.co.uk), or addressed to GPF Lewis House, Old's Approach, Tolpits Lane, Watford, Wd18 9AB.

If you have any complaints relating to our privacy policy or our use of your personal data, please contact us email us at [info@gpflewis.co.uk](mailto:info@gpflewis.co.uk), or contact us at GPF Lewis House, Old's Approach, Tolpits Lane, Watford, Wd18 9AB. You also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. Further information can be found at [www.ico.org.uk](http://www.ico.org.uk).

END OF POLICY



# Cookie Policy

## About cookies

1.1 A cookie is a small file containing an identifier (a string of letters and numbers) that is sent by a web server to your web browser and is stored by the browser if you agree. The identifier is then sent back to the server each time the browser requests a page from the server. Cookies contain information that is transferred to your computer's hard drive.

1.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

## 2. Cookies that we use

2.1 We use cookies for the following purposes:

(a) analysis - we use cookies to help us to analyse the use and performance of our website and services (cookies used for this purpose are analytic cookies). These cookies allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily; and

(b) cookie consent - we use cookies to store your preferences in relation to the use of cookies more generally.

## How do we use cookies?

You can find more information about the individual cookies we use and the purposes for which we use them below:

### Google Analytics

This is a web analytics service provided by Google Inc which uses cookies to show us how visitors found and explored our site, and how we can enhance their experience. It provides us with information about the behaviour of our visitors (for example, how long they stayed on the site, the average number of pages viewed) and also tells us how many visitors we have had. The information gathered



relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>.

### 3. Cookies used by our service providers

Our service providers may also use cookies and those cookies may be stored on your computer when you visit our website. We have no control over the use of such cookies. These cookies are likely to be analytical/performance cookies or targeting cookies.

### 4. Consent and personal data

4.1 Where our use of cookies involves the processing of personal data, such personal data will be processed by us in accordance with our privacy policy.

4.2 In most cases we will need your consent in order to use cookies on this website. The exception is where the cookies are essential in order for us to provide you with a service you have requested or to enable you to access and use our website.

### 5. Managing cookies

5.1 Most browsers allow you to restrict, refuse to accept or to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

(a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);

(b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);

(c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);

(d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);

(e) <https://support.apple.com/kb/PH21411> (Safari); and

(f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

5.2 Blocking all cookies (including strictly necessary cookies) may have a negative impact upon the accessibility and usability of many websites.

5.3 If you block cookies, you may not be able to use all the features on our website.

5.4 If you delete cookies relating to this website we will not remember things about you, including your cookie preferences, and you will be treated as a first-time visitor next time you visit the site.



## 6. Our details

6.1 This website is owned and operated by: GPF Lewis PLC

6.2 You can contact us:

(a) using our website contact form;

(b) by email, [info@gpflewis.co.uk](mailto:info@gpflewis.co.uk)

(c) by telephone, on 0845 257 3612 or

(d) by post, using the address: GPF Lewis House, Old's Approach, Tolpits Lane, Watford, WD18 9AB

END OF POLICY