



Privacy Notice

Environmental Strategies Limited

Last updated	3 rd January 2024
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Definitions

Organisation	means Environmental Strategies Limited or ESL, a company registered under number 03596465 with Registered address at Selby Times Business Centre, 11 The Crescent, Selby, North Yorkshire, England, YO8 4PD
Data Protection Laws	means the Data Protection Act 2018 (DPA2018), United Kingdom General Data Protection Regulation (UK GDPR), the Privacy and Electronic Communications (EC Directive) Regulations 2003 and any legislation implemented in connection with the aforementioned legislation. Where data is processed by a controller or processor established in the European Union or comprises the data of people in the European Union, it also includes the EU General Data Protection Regulation (EU GDPR). This includes any replacement legislation coming into effect from time to time.
Personal Data	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site.
Processing	means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
Responsible Person	means Helen Sprakes, who is the Data Protection Lead.
Register of Systems	means a register of all systems or contexts in which personal data is processed by the Organisation.
Supervisory Authority	means an independent public authority which is established by a Member State pursuant to Article 51 of the "GDPR and in the UK it's The Information Commissioner's Office. We are register with the ICO under ZA732612.

Introduction

The protection and security of the personal data we hold, is very important to us. We protect your personal data in line with the requirements of the General Data Protection Regulation (GDPR).

This Privacy Notice relates to our clients and visitors to our website, users of our services, anyone that contacts us, and all other third parties. We may not be able to fulfil our business commitments to you in the event that we are not able to collect relevant personal data. The UK GDPR requires data controllers such as ourselves to document our lawful basis for processing personal data. It also gives you rights over how your data is processed. This Privacy Notice documents the data we collect, why and how we process it, and how to exercise your rights.

Collection Of Your Personal Data

You may be in contact with the business via email, telephone, social media or through our website. We will maintain records of customer contact which falls under the lawful basis of 'legitimate interest' (maintaining records for business management) and under the lawful basis of being necessary for the 'performance of a contract' with you where you are acting as an individual or as a representative of your organisation.

We do not purchase marketing lists and the personal data we hold is from direct contact between us.

We collect personal data from you for one or more of the following purposes:

- To fulfil a contract that we have entered into with you or with the company that you represent. In these circumstances it may be your company, rather than yourself, that has provided us with your personal data.
- To provide you with information that you have requested or that we think may be relevant on a subject in which you have demonstrated an interest.
- To manage any communication between you and us.
- To initiate and complete commercial transactions with you, or the entity that you represent, for the purchase of products and or services.
- To provide access to and to deliver a range of downloaded material on request.
- To provide you with updates on our services or those third parties who are directly connected with us.
- To ensure the security and safe operation of our websites and underlying business infrastructure.

Purpose of processing

Personal Data

This is processed entirely for the purpose of maintaining contact between us in order to deliver our service and fulfil any contracts which exist between us.

The personal data we may process:

Your first and last name
Your email address
Your telephone number
Your company
Your company address
Your role

For thermographic surveys of domestic properties we may also process:

The domestic address of the property
Your telephone number at the domestic property

The details of any correspondence between you and us

Special category data

Some personal data require greater protection than others. The General Data Protection Regulation (GDPR) defines these special category data as relating to race/ethnicity, beliefs, the body (health and biometrics data) and sexuality. We do not collect any special category data about you.

Sharing your Data

We use a number of cloud based systems to manage our business, specifically:

- iHasco (training provider)
- Zoom (video calls)
- Teams (video calls)
- QuickBooks (accounting software)
- LinkedIn (communication)
- Outlook (email communication)
- SurveyMonkey (staff engagement)
- Dropbox (document and file share)

We ensure that we have appropriate data protection agreements in place with these third parties.

We will share your personal data with law enforcement agencies if we receive a legitimate request from them to do so.

Keep Your Data Secure

We take reasonable all steps to keep your data secure and we have the appropriate security controls in place to protect the accidental loss or unlawfully access of your personal data. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality. We follow top industry standards for information security such as SSL, passwords and encryption. We also have procedures in place to deal with any suspected data security breach. We will notify you and the Information Commissioner's Office of a suspected data security breach where we are legally required to do so.

We do not, however, have any control over what happens between your device and the boundary of our information infrastructure. You should be aware of the many information security risks that exist and take appropriate steps to safeguard your own information. We accept no liability in respect of breaches that occur beyond our sphere of control.

We maintain appropriate records of processing activities which record any data processors we use and we ensure that appropriate contracts are in place to protect your rights and that the processors take appropriate security measures to safeguard your data, and that any international transfers are done correctly under UK data protection laws.

The Length Of Time We Keep Your Data

We won't process your data for any longer than is reasonably necessary for us to do so for the purposes specified above. Specifically:

- If you have indicated to us that you are a client or consumer, we will not send you emails other than those you expressly solicit from;
- We will keep client data records for as long as there is an ongoing relationship and for a continued 7 years thereafter;
- When it is no longer necessary to retain your personal information, we will delete or anonymise it.
- If you have not opted-out of marketing communications from us, but you have also not responded to an email after 12 months of being on our marketing list, we will no longer send you emails unless you expressly request us to;
- If you have opted-out of marketing communications we will no longer send you emails and we will retain a copy of your data solely for the purposes of ensuring you are no longer sent marketing communications.
- We will store transaction, payment, and order data for up to 7 years or for as long as required by UK financial and company regulations.

Your Rights as a Data Subject

As a data subject whose personal information we hold, you have certain rights. If you wish to exercise any of these rights, please email info@esltd.co.uk. To process your request, we will ask you to provide two valid forms of identification for verification purposes.

Your rights are as follows:

The right to be informed

As a data controller, we are obliged to provide clear and transparent information about our data processing activities. This is provided by this privacy notice and any related communications we may send you.

The right of access

You may request a copy of the personal data we hold about you free of charge. Once we have verified your identity and, if relevant, the authority of any third-party requestor, we will provide access to the personal data we hold about you as well as the following information:

- a) The purposes of the processing.
- b) The categories of personal data concerned.
- c) The recipients to whom the personal data has been disclosed.
- d) The retention period or envisioned retention period for that personal data.
- e) When personal data has been collected from a third party, the source of the personal data.

If there are exceptional circumstances that mean we can refuse to provide the information, we will explain them. If requests are irrational, we reserve the right to refuse them. If answering requests is likely to require additional time or occasions unreasonable expense (which you may have to meet), we will inform you.

The right to rectification

When you believe we hold inaccurate or incomplete personal information about you, you may exercise your right to correct or complete this data. This may be used with the right to restrict processing to make sure that incorrect/incomplete information is not processed until it is corrected.

The right to erasure (the 'right to be forgotten')

Where no overriding legal basis or legitimate reason continues to exist for processing personal data, you may request that we delete the personal data. This includes personal data that may have been unlawfully processed. We will take all reasonable steps to ensure erasure.

The right to restrict processing

You may ask us to stop processing your personal data. We will still hold the data but will not process it any further. This right is an alternative to the right to erasure. If one of the following conditions applies, you may exercise the right to restrict processing:

- a) The accuracy of the personal data is contested.
- b) Processing of the personal data is unlawful.
- c) We no longer need the personal data for processing but the personal data is required for part of a legal process.
- d) The right to object has been exercised and processing is restricted pending a decision on the status of the processing.

The right to data portability

You may request your set of personal data be transferred to another controller or processor, provided in a commonly used and machine-readable format. This right is only available if the original processing was on the basis of consent, the processing is by automated means and if the processing is based on the fulfilment of a contractual obligation.

The right to object

You have the right to object to our processing of your data where:

- a) Processing is based on legitimate interest;

- b) Processing is for the purpose of direct marketing;
- c) Processing is for the purposes of scientific or historic research; or
- d) Processing involves automated decision-making and profiling.

Where do we process data?

We process data in the UK. We do utilise cloud computing applications which may transfer data outside of the UK and in this instance, we adhere to controlled and secure data sharing practice.

Your personal data will be collected, stored and processed primarily in the UK. Where we transfer data outside the UK we will ensure we take all reasonable administrative and technical precautions to protect that data. Your data will be stored for seven years after our last interaction.

We use recognised third parties, as listed above, to provide business services, help with advertising, operate our business, take payment, manage our company accounts, and provide banking services, and other common business functions. We will store transaction, payment, and order data for up to 7 years or for as long as required by UK financial and company regulations. These third parties may operate outside the UK.

What happens when I follow links to other sites?

If you follow links to other sites from our website your data will be subject to the privacy notices of those sites. You should refer to these policies before providing your personal data.

Website and Cookies

How do we use cookies on our websites?

Cookies are small text files that are placed on your computer when you access a website. These allow websites to do several important things, including remembering which pages you have visited.

If you visit our website and when your browser is set to accept cookies, we will interpret this as an indication that you consent to our use of cookies and other similar technologies as described in this website cookie policy. If you change your mind in the future about letting us use cookies, you can modify the settings of your browser to reject cookies or disable cookies completely. If you do this, please be aware that you may lose some of the functionality of our website. By continuing to use our website you have consented to information being collected from your device by cookies or other technologies, for the purposes described in this Privacy Notice.

Use of cookies

Our website use cookies to distinguish you from other users of the website. This helps us to provide you with a good experience when you browse our website and also allows us to improve the website and your experience. We do not hold this data. We only use Google Analytics or Google Signals with the following types of cookies:

Performance: They allow us to recognise and count the number of visitors and to see how visitors move around the website when they are using it. This helps us to improve the way the website works, for example, by ensuring that users are finding what they are looking for easily.

Advertising/Targeting: These cookies record your visit to the website the pages you have visited and the links you have followed. We will use this information to make the website and the advertising displayed on it more relevant to your interests.

Contact us

Environmental Strategies Limited is a company with registered offices at Selby Times Business Centre, 11 The Crescent, Selby, North Yorkshire, England, YO8 4PD Our email address is info@esltd.co.uk

Making a complaint

In the first instance we would like the opportunity to address your concerns and provide an amicable solution! We take any complaints very seriously and endeavour to listen to you and where possible make adjustments to company policy and procedure, so, please email us at info@esltd.co.uk or write to us at our registered office which is Selby Times Business Centre, 11 The Crescent, Selby, North Yorkshire, England, YO8 4PD, allowing time for our response. All complaints will be treated in a confidential manner.

Should you feel unsatisfied with our handling of your complaint that you have made to us about our handling of your personal data, you are entitled to escalate your complaint to the supervisory authority for the UK, which is the ICO (Information Commissioner's Office).

The ICO's address:
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113
ICO website: <https://www.ico.org.uk>

Signed:

A handwritten signature in black ink that reads "H. Sprakes". The signature is written in a cursive style with a large, stylized initial "H".

H Sprakes, Director / Responsible Person