



HARBOUR HEATING LTD

PRIVACY POLICY

Introduction

This document refers to personal data, which is defined as information concerning any living person (a natural person who hereafter will be called the “Data Subject”) who is not already in the public domain.

The Data Protection Act (DPA), Privacy and Electronic Communications Regulations (PECR) and The General Data Protection Regulation (GDPR), which is EU-wide and far more extensive, seek 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 such as Companies House data.

Harbour Heating Ltd is pleased to provide the following GDPR information:

Who we are

Harbour Heating Ltd is a UK based Plumbing and Heating Company.

Personal data

Harbour Heating Ltd uses the information collected from you to provide services and marketing information that Harbour Heating Ltd believes may be of interest to you and your business. In having made your initial contact with Harbour Heating Ltd, you consent to Harbour Heating Ltd maintaining a marketing dialogue with you until either you opt out (which you can do at any stage) or we decide to discontinue promoting our services. Harbour Heating Ltd also acts on behalf of its clients in the capacity of data processor. When working exclusively as a data processor, Harbour Heating Ltd will be acting on the instruction of its client and will aim to ensure that the client is fully GDPR compliant.

Some personal data may be collected about you from forms and surveys that you complete; from records of our correspondence and phone calls; and from details of your visits to our website, including but not limited to personally identifying information such as Internet Protocol (IP) addresses. Harbour Heating Ltd may from time to time use such information to identify its visitors. Harbour Heating Ltd may also collect statistics about the behaviour of visitors to its website along with transaction information collected in the process of performing its business.

Harbour Heating Ltd website uses cookies, which are strings of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. Harbour Heating Ltd website visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using Harbour Heating Ltd website.

Any information Harbour Heating Ltd holds about you and your business encompasses all the details we hold about you and any sales transactions, including any third-party information, we have obtained about you from public sources and our own suppliers, such as credit referencing agencies.

Harbour Heating Ltd will only collect the information needed so that it can provide you with its services. Harbour Heating Ltd does not sell or broker your data, although coincidentally there may be times when your information could be contained in data that Local UK Boilers has purchased from a third-party list broker, on behalf of a client.

Who we share your personal information with

Harbour Heating Ltd will not pass on your personal data to third parties unless: it is a requirement of the service or product you have with us, where this will be detailed within the contract, if it is a prerequisite to the service or product you intend to have with us, you will be notified beforehand, we wish to undertake marketing to you under our legitimate interests, or it is a legal requirement to do so.

- Analytics services (Google Analytics)
- Advertising networks (Google, Facebook, Bing, or Amazon)
- Network service providers who provide the service agreed in your contract
- Other service providers if purchased through us, e.g. insurance companies
- Companies we have a joint venture or agreement to co-operate with
- Companies we have contracts with, to provide you with the services agreed in your contract, e.g. device repair centres
- If you use direct debits, we will share your data with the Direct Debit scheme
- Debt collection agencies or other debt recovery organisations
- Law enforcement agencies, regulatory organisations, courts or other public authorities if we have to, or are authorised to do so by law
- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets as part of the process of evaluation and to ensure continuity of service

These third parties have access to your information so that they may perform these tasks on our behalf and they are prohibited by us from using or disclosing your information for any purpose other than to provide this assistance, except to the extent required by law. We may permit our service providers to use aggregate information which does not identify you or de-identified data for other purposes.

Some of the data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It will also be processed by staff operating outside the EEA who are owned by and solely work for us. This includes staff engaged in the provision of support services. We will take all steps necessary to ensure that your data is treated securely and in accordance with this privacy policy and the General Data Protection Regulation (GDPR), and we have the necessary legal contract in place to fulfil these services.

Cookies

Our website uses cookies and similar technologies to enhance your browsing experience, provide personalized content & analyze website traffic. A cookie is a small text file stored on your device when you visit a website. Cookies can be "first-party," set by our website, or "third-party," set by a website other than ours.

Types of Cookies

1. **Necessary Cookies:** These are essential for the operation of our website, allowing you to navigate and use our services. Without these cookies, our website would not function properly.
2. **Preferences Cookies:** These cookies remember your preferences and settings to improve your experience on our website.
3. **Statistics Cookies:** We use these cookies to collect information about how you interact with our website, helping us improve and optimize our site.
4. **Marketing Cookies:** These cookies track your online activity to help deliver more accurate advertising

In compliance with the UK GDPR and PECR, we require your consent to use non-essential cookies. When you visit our website for the first time, a cookie consent banner will appear, allowing you to choose which categories of cookies you accept or reject.

Google Analytics Privacy Policy

Our website uses Google Analytics to collect information about the use of our website. Google Analytics collects information from users such as age, gender, interests, demographics, how often they visit our website, what pages they visit, and

what other websites they have used before coming to our website. We use the information we get from Google Analytics to analyse traffic, remarket our products and services to users, improve our marketing, advertising, and to improve our website.

We have enabled Google Analytics advertising features such as remarketing with Google Analytics, Google Display Network Impression Reporting, and Google Analytics Demographics and Interest Reporting. Google Analytics collects only the IP address assigned to you on the date you visit our website, not your name or other identifying information. We do not combine the information collected using Google Analytics with Personal Data. Although Google Analytics plants a permanent cookie on your web browser to identify you as a unique user the next time you visit our website, the cookie cannot be used by anyone but Google. Google also uses specific identifiers to help collect information about the use of our website. For more information on how Google collects and processes your data, visit <https://www.google.com/policies/privacy/partners/>

You can prevent Google Analytics from using your information by opting out at this link: <https://tools.google.com/dlpage/gaoptout>

Recipients:

Main service provider: Google Ireland Ltd, Gordon House, Barrow Street, Dublin 4, Ireland. Google Analytics Terms of Service: <https://marketingplatform.google.com/about/analytics/terms/gb/> General overview on Google Analytics security and privacy principles: <https://support.google.com/analytics/answer/6004245?hl=en>, as well as Google's privacy policy: <https://policies.google.com/privacy?hl=en>.

Transfers to third countries are possible. As an appropriate safeguard standard contractual clauses pursuant to Art. 46 GDPR were concluded. For third countries/companies which fall under an adequacy decision, the adequacy decision also applies.

Harbour Heating Ltd may from time to time share your details with third party analytical resources for the purposes of better understanding customer behaviour and performance, website performance, improved ad relevance and any other analytical process to give Harbour Heating Ltd a better understanding of how to develop its offering to its customers. These third parties will be employed solely for the purpose of the aforementioned analytical purposes, and as such Harbour Heating Ltd will ensure that the third party is contractually obliged to use the data only for the analytical purposes set out in the agreement between Harbour Heating Ltd and the third party, and Harbour Heating Ltd will also ensure that the third party is contractually required to maintain a level of security around the shared data, at least as safe as Harbour Heating Ltd itself employs.

Failure on the part of the third party to meet its contractual obligations will result in Harbour Heating Ltd recovering the data, and taking all reasonable actions to ensure the third party no longer has access to the shared data. Any third party cookies used on Harbour Heating Ltd will adhere to the same standards as first party cookies and not collect any personally identifiable information.

Facebook

(Website) Facebook Custom Audiences / Conversion (“Facebook Pixel”)

Purpose/Information:

This website may on occasion use the so-called “Facebook Pixel” and the Conversions API of the social network “Facebook” by Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland (Meta) for the following purposes:

- **Facebook (website) Custom Audiences**
We use the Facebook pixel and the Conversions API for remarketing purposes to be able to contact you again within 180 days. This allows us to display interest-based advertisements (“Facebook Ads”) to users of the website when they visit the social network “Facebook” or other websites also using this tool. In this way, we pursue the interest in displaying advertisements that are of interest to you in order to make our website or offers more interesting for you.
- **Facebook conversion**
We also use the Facebook Pixel and the Conversions API to ensure that our Facebook Ads match the potential interest of users and are not annoying. With the help of the Facebook Pixel, we can track the effectiveness of Facebook ads for statistical and market research purposes by seeing whether users were redirected to our website after clicking on a Facebook ad (so-called “conversion”).

Due to the marketing tools used (Facebook Pixel and Conversions API), your browser automatically establishes a direct connection with the Facebook server as soon as you have agreed to the use of cookies requiring your consent. Through the integration of the Facebook pixel and the usage of the Conversions API, Facebook receives the information that you have called up the corresponding website of our internet presence or clicked on an advertisement from us. If you are registered with a Facebook service, Facebook can assign the visit to your account.

The processing of this data by Facebook takes place within the framework of Facebook’s [data policy](#). Special information and details about the Facebook pixel, the Conversions API and its functionality can also be found in the Facebook [help area](#).

Legal basis for processing any personal data

To meet Harbour Heating Ltd contractual obligations to clients and to conform to relevant legal obligations they have.

Legitimate interests pursued by Harbour Heating Ltd and/or its clients

To promote the services offered by Harbour Heating Ltd and/or to market the services and/or products offered by Harbour Heating Ltd existing clients.

Consent

Through agreeing to this privacy notice you are consenting to Harbour Heating Ltd processing your personal data for the purposes outlined. You can withdraw consent at any time by emailing info@harbourheating.co.uk; by phoning 01202 622925; or by writing to us. See last section for full contact details.

Disclosure

Harbour Heating Ltd may, on occasion, pass your Personal Information to third parties exclusively to process work on its behalf. Harbour Heating Ltd requires these parties to agree to process this information based on our instructions and requirements consistent with this Privacy Notice and GDPR. Harbour Heating Ltd does not broker or pass on information gained from your engagement without your consent. However, Harbour Heating Ltd may disclose your Personal Information to meet legal obligations, regulations, or valid governmental requests. Harbour Heating Ltd may also enforce its Terms and Conditions, including investigating potential violations of its Terms and Conditions, to detect, prevent or mitigate fraud or security or technical issues; or to protect against imminent harm to the rights, property, or safety of Harbour Heating Ltd, its clients and/or the wider community.

Retention policy

Harbour Heating Ltd will process personal data during the duration of any contract and will continue to store only the personal data needed for seven years after the contract has expired to meet any legal obligations. After seven years any personal data not needed will be deleted.

Data storage

Data is held on multiple servers within the United Kingdom. Harbour Heating Ltd does not store personal data outside the EEA.

Data transfers

Although Harbour Heating Ltd does not store personal data outside of the EEA, in certain circumstances we may need to transfer personal data outside of the EEA in order to provide our services (e.g. when processing transactions for international numbers). In such cases, Harbour Heating Ltd is committed to ensuring that third party data processors, who may themselves store personal data outside of the EEA,

adhere to the highest possible level of data privacy, and, wherever practically possible, will endeavour to impose legally binding obligations on said third parties. This may include, but is not limited to, relying on EU adequacy decisions and/or PCI compliance regulations, and/or enforcing standard contractual provisions.

Your rights as a data subject

At any point whilst Harbour Heating Ltd is in possession of or processing your personal data, all data subjects have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply, you have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
Right to object to automated processing, including profiling – you also have the right not to be subject to the legal effects of automated processing or profiling.
- In the event that Harbour Heating Ltd refuses your request under rights of access, we shall provide you with a reason, which you have the right to challenge legally. Harbour Heating Ltd can, at your request, confirm what information it holds about you and how it is processed.

You can request the following information:

- Identity and the contact details of the person or organisation (Harbour Heating Ltd) that has determined how and why to process your data.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Harbour Heating Ltd or a third party such as one of its clients, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.

- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority (ICO).
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it was not collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

To access details of what personal data is held, identification will be required. Harbour Heating Ltd will accept the following forms of ID when information on your personal data is requested: a copy of your driving licence; passport; birth certificate; and a utility bill not older than three months. A minimum of one piece of photographic ID listed above and a supporting document is required. If Harbour Heating Ltd is dissatisfied with the quality, further information may be sought before personal data can be released.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Harbour Heating Ltd or its partners, you have the right to complain to Harbour Heating Ltd director. If you do not get a response within 30 days, you can complain to the ICO.

The details for each of these contacts are:
 Harbour Heating Ltd, attention of the Director
 Telephone 01202 622925 or email info@harbourheating.co.uk

If we do not issue a final response within eight weeks, or if you are not satisfied with the outcome or progress of the complaint, you have the right to refer your complaint to the credit provider/s and/or the Financial Ombudsman Service.

How do I complain?

- Contact us directly using the above details.
- Or contact the Information Commissioner's Office (ICO):
 - Online: <https://ico.org.uk/concerns/>
 - Phone: 0303 123 1113

If we do not issue a final response within eight weeks, or if you are not satisfied with the outcome or progress of the complaint, you have the right to refer your complaint to the credit provider/s and/or the Financial Ombudsman Service.

On the rare occasion that we do receive a complaint, we take it very seriously.

If you have an issue with a product purchased via finance and we have been unable to resolve your issue, please contact TradeHelp Ltd using the following details:

- Write: Marchwiel Centre, Bryn Lane, Wrexham Ind Est, LL13 9UT
- Telephone: 01978 666887
- E-mail: info@tradehelp.co.uk

If your complaint relates to the finance linked to your purchase you can still let us know about this, but we will forward it on to your credit provider. Your credit provider will acknowledge your complaint and investigate it thoroughly and issue their response within eight weeks.

What to do if you can't reach an agreement:

If you are not satisfied with the broker's/lender's response to your complaint relating to the finance agreement, you may be able to refer the matter to the Financial Ombudsman Service.

You must contact them within six months of the date of the lender's final response letter to you. They can be contacted in the following ways:

- Write: Financial Ombudsman Service, Exchange Tower, London, E14 9SR
- Telephone: 0300 123 9 123
- E-mail: complaint.info@financial-ombudsman.org.uk

Further details can be found on the Financial Ombudsman Service website: www.financial-ombudsman.org.uk