

Privacy Statement - HeatTransformers Ltd

We are aware that you place your trust in us. We therefore see it as our responsibility to protect your privacy and to give you insight into how we do so. This document describes how HeatTransformers complies with its legal obligations under applicable data protection laws, including the UK Data Protection Act 2018 and the EU General Data Protection Regulation (together the “**Data Protection Legislation**”).

Introduction

The personal data privacy statement applies to all site visits, information and advice requests, transactions and agreements with HeatTransformers Ltd (www.heattransformers.com).

HeatTransformers Ltd is a company registered in the United Kingdom with registered company number 15422777 and registered address at 100 Avebury Boulevard, Milton Keynes, United Kingdom, MK9 1FH. HeatTransformers is responsible for the processing of personal data, as reflected in this privacy statement.

In this privacy statement, we let you know what data we collect when you use our products, services and/or website, what is done with your data, what we need it for and what rights you have. We are the data controller for the purposes of the personal information processed in accordance with this Privacy Statement.

Basis for processing personal data

We only ever use your information in line with the Data Protection Legislation. In short, this means we only use it where we have a legal basis to do so. Under the Data Protection Legislation, these are the general legal bases for which we process your personal information:

- **Consent** – you have given us consent to process your personal information for a specific purpose that we have told you about.
- **Performance of our contract** – processing your personal information is necessary for a contract you have with us, or because we have asked you to take specific steps before entering into that contract.
- **Legitimate interests** – processing your personal information is necessary for our legitimate interests or those of a third party, provided those interests are not outweighed by your rights and interests (including where processing is required to comply with or enforce a legal obligation, or to exercise or defend our legal rights).

HeatTransformers processes your personal data because you use or want to use our services, and/or you provide this data to us.

Purposes of processing

HeatTransformers processes your personal data for:

- providing information and advice on the suitability of our products in your home;

- preparing quotations and agreements;
- the execution of agreements, transactions, services, and delivery of goods;
- planning and making appointments for service-related activities;
- to provide user support to the end user and technical support to HeatTransformers;
- Collecting technical information (data) on maintenance, management, faults, fault frequencies, repairs, and energy consumption of the installations, with the aim of optimising installation operation;
- relationship management;
- product and service development;
- administrative actions;
- setting strategy and policy;
- personnel administration;
- application procedures;
- making offers;
- complying with our legal obligations.

When you visit our website, no personal data will be collected by us without your consent. We do record data that does not contain personal information. This is to gain insight into how our website is used (cookies).

Provision of personal data

HeatTransformers needs your data to keep records, to contact you in order to fulfil our obligations arising from the agreements made and to store correspondence data. We do this carefully and in accordance with the Data Protection Legislation. This information may include first name, surname, address, company name, job title, e-mail address, IP address, installation dates, home properties, and further contact details or other details we request from you.

If you do not provide data which we require under the terms of our contract (including this Privacy Notice), HeatTransformers cannot serve you or complete works which we have otherwise agreed upon. As a result, providing personal data is a necessary condition of entering into an agreement with HeatTransformers. If you do not wish to provide required personal data, then you should not complete a contract with us.

Installation Data

“Installation Data” is data that you, our staff, or your installation sends to us via a building management system or thermostat. Examples include photos of your heating system, data on the measured temperature in rooms, system status, error messages, energy consumption, temperatures of installations as well as sensors in the appliances, and counter readings such as operating hours and general sensor values.

We require Installation Data in order to monitor our installed products and deliver our services to you.

Security of personal data

HeatTransformers processes your data in a database, which is well secured according to standards prescribed in the Data Protection Legislation. HeatTransformers uses careful security procedures to protect the data processed, including to prevent unauthorised access

to such data. HeatTransformers takes the protection of your data seriously and takes appropriate measures to protect against misuse, loss, unauthorised access or unwanted disclosure.

Disclosure to third parties

As a general rule, your personal data will not be disclosed to third parties without your explicit consent. However, there are exceptions to this, and we may disclose personal data in the following circumstances:

- **HeatTransformers staff and our group of companies:** we share your information with our staff (including employees, consultants, agents and advisors) and within the HeatTransformers group of companies as required for: providing you with access to our services according to our agreement, data storage and processing, providing customer support, making internal choices around business improvements, content development, and for the other purposes set out in this Privacy Statement.
- **Third Party Providers:** We use certain companies, agents or contractors to perform services on our behalf or to help deliver our services to you. In particular, we contract with Third Party Providers, for example to track our contacts and communications, marketing communications, infrastructure and IT services, to personalise and enhance our services, to provide customer service, to collect debts, and to analyse and action data (including data about interactions with our services). In the course of providing such services, these Third Party Providers may have access to your personal information. We do not authorise them to use or disclose your personal information except in connection with providing their services to us.
- **Promotions with our partners:** We may offer joint promotions, schemes or incentives with our selected partners that, in order for you to participate, will require us to share your information with the relevant partner. In fulfilling these types of promotions, we may share your name and other information in connection with fulfilling the relevant incentive. Please note that our partners are responsible for their own privacy and data protection methods and if applicable you should refer to their relevant privacy policy.
- **To protect legitimate interests:** There are certain circumstances where HeatTransformers and our Third Party Providers may disclose and/or make use of your information where a disclosure would be necessary to: (a) satisfy any applicable law, regulation, legal process, or other legal or governmental request or requirement, (b) enforce applicable terms of use, including investigation of any actual or alleged breaches, (c) detect, prevent, or otherwise address illegal or suspected illegal activities (including payment fraud), security or technical issues, or (d) protect against harm to the rights, property or safety of HeatTransformers, its users or the public, as required or permitted by law.
- **Transfers of our business:** In connection with any corporate reorganisation, restructuring, investment, merger or sale, or other transfer of assets, we will transfer information, including personal information, provided that the receiving party agrees to comply with our requirements as set out in this Privacy Policy relating to your personal information.

Data retention

Unless a longer retention period is required or permitted by law, we will only hold your personal information on our systems for the period necessary to fulfil the purposes outlined in this Privacy

Statement or until you request that the personal data be deleted. Even if we delete your personal information, it may persist on backup or archival media for legal, tax or regulatory purposes.

In accordance with this Privacy Statement, you have the right to request that we delete your personal information, except where we are legally permitted or required to maintain certain personal information. For example:

- We are legally required to retain financial and transaction data for a minimum period of 7 years for tax, audit and accounting purposes. This includes keeping a record of the amount of each transaction, what it related to, and who we transacted with.
- If there is an unresolved issue, then we will retain your personal information until the issue is resolved.
- There may be other situations where we have legitimate business interests to retain personal information, such as to prevent fraud or protect security of other people interacting with us.

Any Third Party Providers that we engage will keep your personal information stored on their systems for as long as is necessary to provide the relevant services to you or us. If we end our relationship with any third party providers, we will take reasonable steps to ensure that they securely delete or return your personal information to us.

We may retain personal information about you for statistical purposes. Where information is retained for statistical purposes it will be anonymised, meaning that you will not be identifiable from that information.

We will keep your personal data for as long as necessary for the processing of our agreement and then according to permitted legal retention periods in our archives. When applying for a job, we will keep your personal data for as long as necessary for the application process.

Communications

Marketing communications:

By consenting to receive additional communications (by mail, telephone, text/picture/video message or email) from us and any named third parties that feature at the point of obtaining consent in respect of such information, we will process your personal information in accordance with this Privacy Statement. You can change your marketing preferences by contacting us directly. If you choose not to receive this information we will be unable to keep you informed of new services and promotions of ours, or the HeatTransformers group of companies, that may interest you. Whatever you choose, you'll still receive other important information, for example service updates, as described below.

Service communications:

We may send you communications such as those which relate to any service updates (e.g. new products or service availability) or provide customer satisfaction surveys. We consider that we can lawfully send these communications to you as we have a legitimate interest to do so, namely to effectively provide you with the best service we can and to develop our offering.

Cookies

HeatTransformers uses cookies on its website. The main purpose of these cookies is to understand how you use our website and to save you time and effort. For example, if you customise a webpage to your personal preferences or if you navigate around a website, thanks to cookies, the chosen settings and preferences are remembered for future use. When you visit the website again later, the previously entered data can be retrieved by the cookies, allowing you to easily use the website's features again as you previously set them up.

If you choose not to accept cookies, you may not be able to take full advantage of the interactive features of this website or other sites you visit.

Links to other websites

Our website may, from time to time, contain links to websites operated by third parties. This Privacy Statement only applies to the personal information that we collect from you and we are not responsible for personal information collected and stored by third parties. If you click on a link, the relevant third party websites have their own terms and conditions and privacy policies, and we do not accept any responsibility for the content of those third party websites or third party terms and conditions or policies. Please check these policies before you submit any personal information to these websites.

Right of inspection, rectification, deletion and objection

You can object to the processing of your data or withdraw your consent to process data. You can do this by contacting us at info@heattransformers.com. Upon receipt of your request, it will be reviewed to legal standards prior to deletion of the data. You can also lodge a complaint with the Personal Data Authority.

Under the Data Protection Legislation, you are entitled to certain rights. There are circumstances in which your rights may not apply. You have the right to request that we:

- provide you with a copy of the information we hold about you;
- update any of your personal information if it is inaccurate or out of date;
- delete the personal information we hold about you - if we are providing services to you and you ask us to delete personal information we hold about you then we may be unable to continue providing those services to you;
- restrict the way in which we process your personal information;
- stop processing your data if you have valid objections to such processing; and
- transfer your personal information to a third party.

For more information on your rights and how to use them, or if you would like to make any of the requests set out above, please contact us.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Even if you consented to the processing of your personal information for marketing purposes (by ticking the relevant box or by requesting information about services for example), you have the right to ask us to stop processing your personal information for such purposes. You can

exercise this right at any time by contacting us. Please note that we reserve the right to charge a fee for responding to requests where we reasonably determine that they are manifestly unfounded or onerous or being made in bad faith.

Disclaimer

The greatest care has been taken in compiling our website and its contents. Nevertheless, imperfections may occur. HeatTransformers accepts no liability arising from the use and content of the website. HeatTransformers reserves the right to make changes to this Privacy Statement, for example, due to new legal developments or online services, and the latest Privacy Statement will apply to any contract between us as amended.

Contact

If you wish to contact us regarding this Privacy Statement or your personal data, our contact details are as follows:

Email: info@heattransformers.co.uk

Telephone: (+44) 03300240183

Postal address: 100 Avebury Boulevard, Milton Keynes, United Kingdom, MK9 1FH

If you are not satisfied with the way a complaint you make in relation to your Data is handled by us, you may be able to refer your complaint to the relevant data protection authority. For the UK, this is the Information Commissioner's Office (ICO). The ICO's contact details can be found on their website at <https://ico.org.uk/>.

General

You may not transfer any of your rights under this Privacy Statement to any other person. We may transfer our rights under this Privacy Statement where we reasonably believe your rights will not be affected.

If any court or competent authority finds that any provision of this Privacy Statement (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this Privacy Statement will not be affected.

Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy. This Privacy Statement will be governed by and interpreted according to the law of England and Wales. All disputes arising under the Agreement will be subject to the exclusive jurisdiction of the English and Welsh courts.