

# PRIVACY STATEMENT

### Overview

- L.C. Smales & Son Ltd is committed to protecting the privacy of our clients and users of our website.
- L.C. Smales & Son Ltd will ensure that information submitted to us, or collected by us via various channels including our website and email, is only used for the purposes of providing a storage and scanning service.
- L.C. Smales & Son Ltd is registered with the Information Commissioner's Office as a Data Controller, Registration Number ZA389160.

### Security and Privacy Summary

- All data collected and submitted is treated with the strictest of confidentiality.
- L.C. Smales & Son Ltd aims to comply with all GDPR regulations.
- No sensitive or personal data other than email address, name and phone number is collected via the website.
- We do not collect contact information for any marketing purposes.
- As per HMRC guidelines we will hold a photographic proof of identity, such as a passport or driving licence for all self-storage customers whilst our agreement is active.
- We do not disseminate personal information to any third parties whatsoever.
- All staff are subject to an in-house confidentiality agreement.
- L.C. Smales & Son Ltd can provide a client confidentiality agreement if requested and we are always happy to sign clients' own confidentiality agreements or NDAs.

### Storage and Retention Summary

- Clients can request deletion of data at any time.
- Personal client information is managed via paper records and computer records securely stored in our offices and also, our accounting software located at our Head Office (Thornton Farm, TD15 2LP).
- Personal client information is retained for a set period in accordance with our Retention Policy.
- Collected customer data is managed via FTP upload, original hard paper copies and storage on encrypted portable devices and encrypted removable media. FTP upload, removable media and encrypted portable devices mean each customer has a private login with username and password known only to them and to the Directors of L.C. Smales & Son Ltd.
- Scanned files are retained for no more than 14 days from job completion and will then be electronically shredded.
- Hard paper files and documents will be retained for no more than 30 days from job completion and will then be returned via our dedicated delivery service to the client offices; confidentially destroyed having received written approval from the client or, stored long-term as per our storage agreement in Smales Secure Storage's dedicated document storage facility (alarmed, covered by CCTV and with preventative measures in place for fire, theft and vermin).
- All computers are password protected and software necessary for our business operation is also password protected.
- Paper client information records are stored in locked cupboards.

## **Privacy Policy**

• The website <u>www.smalessecurestorage.co.uk</u> is operated by L.C. Smales & Son Ltd, a private limited company whose registered address is Thornton Farm, Berwick-upon-Tweed, TD15 2LP.

- The company is registered with the Information Commissioner's Office as a Data Controller, Registration Number ZA389160.
- Smales Secure Storage operates from West Allerdean, Berwick-upon-Tweed, TD15 2TD.

### **Information We Collect**

- Statistical and personal information is collected via our website.
- Statistical information is collected via Google Analytics for marketing purposes.
- Personal information is collected via our Quotation Request Form on which your name, email address and phone number (which are required) are not stored on the website. They are retained by us for a period of 14 days after which they are electronically shredded.
- Should you email us via the website, your email address and name (which are required) are not stored on the website.

### How We Use Your Personal Information

The information you provide to L.C. Smales & Son Ltd will be kept confidential. We will hold and use any information purely for our legitimate business purposes including:

- To provide a storage and scanning service to you.
- To enable any necessary identity checks during the provision of our self-storage service.
- To fulfil any contractual obligations with our clients.
- To release personal information to law enforcement agencies, if due to a legitimate need we are required or permitted to do so.
- L.C. Smales & Son Ltd does not use your personal information for the purposes of Direct Marketing.

### The Legal Basis For Processing Your Personal Information

Under GDPR the main grounds that we rely upon in order to process personal information is the following:

- It is necessary for entering into or performing a contract.
- In order to perform obligations that we undertake in providing a service to you or in order to take steps, at your request, to enter into a contract with us, it will be necessary for us to process your personal data.

### **Third Parties**

We will not share your personal information with any third parties, with the exception of a legitimate need by law enforcement agencies. Smales Secure Storage is fully committed to protecting our customers and their goods in store. Any security breaches will be dealt with swiftly and you will be contacted by a Director of L.C. Smales & Son Ltd prior to any law enforcement agencies receiving your personal details. If, however we are unable to contact you by the methods given at the time of our agreement being signed, Smales Secure Storage will forward your information to the relevant law enforcement agency requesting access.

### Use of Cookies and Tracking Technology

We do not collect any user data from cookies on the website.

### Security

We respect your information and have put in place measures to ensure the security of information we collect and store. We are committed to safeguarding your personal data from misuse, loss, unauthorised disclosure, or access.

You have certain rights in relation to personal information we hold about you. Details of these rights and how to exercise them are set out below. Please note that we will require evidence of your identity before we are able to act on your request.

### **Right of Access**

You have the right at any time to ask us for a copy of any personal information about you that we hold.

To the extent that we process your personal information based on your consent, you have the right to withdraw your consent at any time.

### Complaints

If you are unhappy about our use of your personal information, you may contact us at <u>laura@smalessecurestorage.co.uk</u>. You are also entitled to lodge a complaint with the UK Information Commissioner's Office.

### **Changes to our Privacy Policy**

If we change our privacy policy in the future, we will advise you of any material changes to the policy by email.