

# PRIVACY POLICY

## 1. Introduction

Tencer Ltd are committed to the protection of your personal information and are committed to safeguarding your privacy.

This document sets out the basis on which any personal information we collect from you, or that you provide to us will processed by us.

We will be the “controller” of the personal information which you provide to us or which we collect from you.

## 2. Personal information that we may collect

**We may collect personal information relating to you, including your:**

- Name
- Delivery and billing address
- Email address
- Job title
- Telephone number
- Details of your telephone call or email
- If you contact us, we may keep a record of that correspondence, including any information provided or required to resolve your enquiry or issue.
- Payment information via telephone, however this information will never be stored or written down and will be used for a one off payment at the time of telephone call with your consent.

## 3. How we use your personal information

**We use your personal information as follows:**

- To maintain our relationship with you whilst you are a customer
- To process orders and provide agreed services to you
- For invoicing, processing payments, account set up and maintenance
- To communicate with you, including to respond to information requests / enquires submitted and/or to obtain your feedback on our products and services
- For record keeping, certification, statistical analysis and internal reporting and research purposes
- To ensure data security and to provide you with access to secure areas of our website
- To notify you about changes to our products and services
- To decide on and notify you about price changes

- To monitor the quality of our products services
- For logistical purposes, including to plan and log engineer routes
- To investigate any complaint you make
- To provide evidence in any dispute or anticipated dispute between you and us
- To customise various aspects of our website to improve your experience
- As we may otherwise consider necessary to support the operation of our website
- To obtain credit references, credit checks and for debt collection, fraud detection and prevention and risk management purposes
- To monitor and/or record telephone conversations to or from you in order to offer you additional security, resolve complaints, improve our service standards and for staff training purposes
- To protect the rights, property, and/or safety of Tencer Ltd, its personnel and others

## Marketing

We may send you direct marketing in relation to our own products and services by phone and post, as long as this is in line with any marketing preference's that you have provided to us.

**We will only send you direct marketing in relation to our own products and services by email:**

- Where you have consented to this; or
- Where you have not objected to this; and we are marketing similar products and services to those which were the subject of a previous sale or negotiations of a sale to you

Your agreement to the use of your personal information direct marketing purposes is optional and if you choose not to consent, your visit to and use of our website will not be affected.

You can choose to opt out of receiving direct marketing information from us at any time by contacting Tencer Ltd:

- By post to Tencer Ltd, Unit 14/15 Lincolns Park Business Centre, Lincoln Road, Cressex Business park, High Wycombe, Bucks HP123RD.
- By email to [accounts@tencer.com](mailto:accounts@tencer.com)
- By telephone 01494 459801

## Recruitment

If you choose to apply for a job with us we will ask you to complete an application form and provide a C.V. You will also be asked to provide supporting documentation such as technical certificates, training certificates, driving licence.

- Where you are successful in your application for a job with us we will retain your documentation for as long as you are employed by us.
- Where you are unsuccessful in your application for a job with us we will delete and remove your personal information after 6 months, unless you request your information is deleted upon unsuccessful application.

## 4. Automated decision making/profiling

### Credit Checks

We use technology provided by credit reference agencies ("CRAs") that processes personal information that you provide to us, in order to analyse your creditworthiness, which helps us to decide if we are able to offer you an account, through which you can purchase products and services from Tencer Ltd. We will also

continue to exchange information about your settled accounts and any debts not fully repaid on time. CRAs will share this information with other organisations, which may use it to make decisions on future applications for credit.

If you pass our credit checks, and our other account opening criteria (details of which will be made available to you during the account opening process) you will be entitled to open an account with us and order our products and services in accordance with our Terms and Conditions of Sale. If you do not pass our credit checks you will not be able to set up an account but you may still be entitled to order our products and services (in accordance with our Terms and Conditions of Sale) at our discretion, by making payment upfront.

## **Google**

We use The Directory Guys and Google search which places our website within search results. These services use cookies (and in some instances information held in your Google account, if you have one) in order to build profiles about you, for the purposes of providing you with personalised adverts. See section 8 for further details.

## **IP Address**

We may collect information about your computer, including your IP address, operating system and browser type, for system administration purposes and to report aggregate information to our advertisers. This is statistical data concerning browsing actions and patterns and does not identify any individual.

## **5. Legal basis for processing**

**In terms of the legal basis we rely on to process your personal information, these are as follows:**

- Where you have provided your consent: for direct marketing communications in respect of our own products and services, including in respect of marketing communications sent by electronic means (e.g. email)
- For the performance of a contract with you (such as a contract for the provision of goods and services) or to take steps at your request prior to entering into this contract
- To comply with legal obligations, including in relation to health and safety and environmental legislation, performing anti-money laundering, terrorism prevention and sanctions screening checks, complaints and investigations or litigation
- To protect your vital interests or the vital interests of another person, e.g. where you or they are seriously injured or ill
- To provide legislative certification
- For our legitimate interests in:
  - Management of your account (including processing payments and our relationship with you, and communicating with you)
  - Operating our website
  - To process orders and provide agreed services to you
  - Our internal business purposes which may include processing for the purposes of: record keeping, research, reporting and statistics, data security, to ensure the quality of our products and services, investigating and responding to queries and complaints, obtaining credit references and credit checks, providing payment performance data to credit reference agencies, changing our pricing, debt collection, fraud detection and prevention, risk management, recruitment and training or our personnel, and protecting our rights, property and safety (and that of others).

## 6. How we share your information

When we use your personal information for the purposes specified above, we may also share your personal information with:

- Third party providers who provide the following types of services to us: marketing, software, recruitment and customer relationship management
- Third party service providers and agents we appoint as our sales agents or to perform services on our behalf, who are provided with access to certain Tencer Ltd customer personal information to process sales or provide services on our behalf
- Third party advertising partners, such as The Directory Guys and Google in order for them to assist us in providing you with targeted adverts/links
- Licensed credit reference agencies, debt collection agencies and lawyers when we carry out credit checks, to report on your payment performance and/or seek to recover debts due to us
- Our accountants, auditors, lawyers or similar advisers when we ask them to provide us with professional advice
- Emergency services in the event that we need to report accidents or incidents or request emergency assistance
- Any Government Department, public body or other third party where we believe in good faith that the law requires this; in the interests of public health and safety; or safety of Tencer Ltd, its employees or others
- Investors and other relevant third parties in the event of an actual or potential sale or other corporate transaction related to Tencer Ltd
- Any other third parties, if authorised by you to do so

## 7. How long we keep your personal information

We retain your personal information for no longer than is necessary for the purposes for which the personal information is collected. When determining the relevant retention periods, we will take into account factors including:

- Legal obligation under applicable law to retain data for a certain period of time
- Statute of limitations under applicable law
- Potential disputes
- Legislative certification
- Guidelines issued by relevant data protection authorities

Otherwise, we securely erase your information once this is no longer needed.

## 8. Cookies

We use Cookies on our website to optimise functionality.

You may block cookies by adjusting the setting on your browser. Please note that if you restrict all cookies (including essential cookies) you may not be able to access all or parts of our web site. Unless you have configured your browser to refuse cookies, our system will issue cookies as soon as you visit our website.

These cookies collect information about your browsing habits in order to deliver adverts/information more relevant to you and your interests.

Please note that none of the information contained in these cookies has any personal identifier information (PII) attached to it (such as email, telephone, name, etc.).

## 9. Links to third party websites

Our website contains links to other internet websites. Unless otherwise explicitly stated, we are not responsible for the privacy practices or the content of such websites, including such sites use of any personal information. Nevertheless, in the event you encounter any third party associated with our website (or who claims association with our website) who you feel is improperly collecting or using information about you, please contact [accounts@tencer.com](mailto:accounts@tencer.com) we will be happy to forward your message to the third party.

## 10. Security

We have implemented reasonable security measures to protect information from loss, misuse and unauthorised access, disclosure, alteration or destruction. Our security systems include authenticated access to internal databases, encrypted documentation, Information Sharing Agreements (ISA's) audits of procedures, and security reviews.

Whilst we take appropriate technical and organisational measures to safeguard the personal information that you provide to us, please be aware that no transmission of information over the internet can be guaranteed to be secure. Consequently, please note that we cannot guarantee the security of any personal information that you transfer to us over the internet.

## 11. Your rights

The following section explains your rights. The various rights are not absolute and each is subject to certain exceptions or qualifications.

We will grant your request only to the extent that it follows from our assessment of your request that we are allowed and required to do so under data protection laws. Nothing in this Privacy Policy is intended to provide you with rights beyond or in addition to your rights as a data subject under the data protection laws.

### 1. The right to be informed

You have the right to be provided with clear, transparent and easily understandable information about how we use your personal information and your rights. This is why we're providing you with the information in this Privacy Policy.

### 2. The right of access

You have the right to obtain a copy of your personal information (if we're processing it), and other certain information (similar to that provided in this Privacy Policy) about how it is used.

This is so you're aware and can check that we're using your personal information in accordance with data protection law.

We can refuse to provide information where to do so may reveal personal information about another person or would otherwise negatively impact another person's rights.

### **3. The right of rectification**

You can ask us to take reasonable measure to correct your personal information if it's inaccurate or incomplete E.g. if we have the wrong date of birth or name for you.

### **4. The right or erasure**

This is also known as "the right to be forgotten" and, in simple terms, enables you to request the deletion or removal of your personal information where there's no compelling reason for us to keep using it or its use is unlawful. This is not a general right to erasure; there are exceptions, e.g. where we need to use the information in defence of a legal claim.

### **5. The right to restrict processing**

You have rights to "block" or suppress further use of your personal information when we are assessing a request for rectification or as an alternative to erasure. When processing is restricted, we can still store your personal information, but we may not use it further. We keep lists of people who have asked for the further use of their personal information to be "blocked" to make sure the restriction is respected in future.

### **6. The right to data portability**

You have rights to obtain and reuse certain personal information for your own purposes across different organisations. This enables you to move, copy or transfer your personal information easily between our IT systems and theirs (or directly to yourself) safely and securely, without affecting its usability. This only applies to your personal information that you have provided to us that we are processing with your consent or to perform a contract which you are a party to (such as pay and compensation services), which is being processed by automated means.

### **7. The right to object**

You have the right to object to certain types of processing, on grounds relating to your particular situation, at any time in so far as that processing takes place for the purposes of legitimate interests pursued by Tencer Ltd or a third party. We will be allowed to continue to process the personal information if we can demonstrate "compelling legitimate grounds for the processing which override (your) interests, rights and freedoms" or we need this for the establishment, exercise or defence of legal claims.

### **8. Rights in relation to automated decision making and profiling**

You have the right not to be subject to a decision based solely on automated processing (including profiling), which significantly affects you, subject to some exceptions.

Where this is the case, you have the right to obtain human intervention, voice your concerns and to have the decision reviewed.

## **12. Updating this statement**

We review our privacy practices from time to time. We ask that you bookmark and periodically review this page for updates to our Privacy Policy. We reserve the right to modify this policy effective seven days after the posting of the revised Privacy Policy.

## **13. Contact us**

For further information regarding these rights, about this Privacy Policy generally or to make a complaint please contact our nominated representative Christina Quinn.

Please provide as much information as possible to help us identify the information you are requesting, the action you are wanting us to take and why you believe this action should be taken.

Before assessing your request, we may request additional information in order to identify you. If you do not provide the requested information and, as a result we are not in a position to identify you, we may refuse to action your request.

We will generally respond to your request within one month of receipt of your request. We can extend this period by an additional two months if this is necessary taking into account the complexity and number of requests that you have submitted.

**We will not charge you for such communications or actions we take, unless:**

- You request additional copies of your personal data undergoing processing. in which case we may charge for our reasonable administration costs, or
- You submit manifestly unfounded or excessive requests, in particular because of their repetitive character, in which case we may either charge for our reasonable administration costs or refuse to act on the request.

If after contacting Tencer Ltd you are still unhappy you may complain to the Information Commissioner, all contact details are available on the Information Commissioner's Website: <https://ico.org.uk>

**Tencer Ltd, Units 14/15 Lincolns Park Business Centre, Lincoln Road, Cressex Business Park, High Wycombe, Bucks, HP12 3RD**

**Telephone: 01494 459801**

**EMAIL: [accounts@tencer.com](mailto:accounts@tencer.com)**

**[www.tencer.com](http://www.tencer.com)**