

## **Introduction**

Welcome to the Masterfix Domestic Appliance Repairs Limited's privacy policy.

We take your privacy seriously and are committed to protecting and respecting your privacy. This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it, as well as telling you about your privacy rights and how the law protects you.

Please use the Glossary at the end of this policy to understand the meaning of some of the terms used in this policy.

If you use our services, make any enquiries with us, buy goods and/or parts from us or submit information through our website contact forms at [www.masterfix.co.uk](http://www.masterfix.co.uk), you will be asked to confirm whether you accept and consent to the practices described in this policy. This includes any enquiries you make about our services and/or goods, current orders or employment vacancies whether that communication is made face-to-face, via post, via telephone, via email, via the website or any other electronic means, in each case you will be asked to confirm whether you accept and consent to the practices described in this policy.

It is important that you read this privacy policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy adds to the other notices and is not intended to override them.

### **1. Who are we?**

We are Masterfix Domestic Appliance Repairs Limited. We are a company registered in England and Wales, our company registration number is 04238914. Our registered office address is Unit 4 Markham Vale Environment Centre, Markham Lane, Markham Vale, Chesterfield, Derbyshire, S44 5HY.

References to 'we', 'us' or 'our' in this Privacy Policy means Masterfix Domestic Appliance Repairs Limited and references to 'you' or 'your' means the person who is reading this notice.

For the purpose of the Data Protection Act 1998 (the "Act") and the EU General Data protection Regulation ("GDPR"), the data controller is Masterfix Domestic Appliance Repairs Limited.

### **2. How do we collect your personal information?**

We collect personal information in a few different ways, including:

- When you contact us to make enquiries about our services, enquire about goods and/or parts, or enquire about an existing ongoing service, or enquire about any employment vacancies;
- When we provide services and/or goods to you;
- When you provide us with information by filling in forms on our website [www.masterfix.co.uk](http://www.masterfix.co.uk) ("our website") or by corresponding with us by phone, e-mail or otherwise;

- When you complete reviews, surveys, feedback or evaluation forms that we use for research and development purposes;
- When we collect and compile publicly available information about you or your business; or
- When we collect your data from third parties such as other professional service providers.

### 3. What personal information do we collect from you?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of services and/or goods you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses registered with us, for example as part of your Masterfix Loyalty Club Membership or your login account details.
- **Usage Data** includes information about how you use our website and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Professional Data** includes job title, qualifications, professional experience and current or previous education.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions,

trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

Our website and services are not intended for children and we do not knowingly collect data relating to children.

#### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with repair services). In this case, we may have to cancel an order for services you have with us but we will notify you if this is the case at the time. We will also not be able to process any employment application or enquiry.

#### **4. How is your personal data collected?**

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact, Professional and Financial Data by filling in forms or by corresponding with us face-to-face, by post, phone, email, via our website or otherwise. This includes personal data you provide when you:
  - meet us in person;
  - order our services and any replacement parts or goods;
  - perform a contract we have or are trying to enter into with you;
  - use our website or create a membership account or login via our website;
  - subscribe to our blog or publications;
  - request marketing to be sent to you;
  - enter a competition, promotion or review or survey;
  - enquire about any of our services, current ongoing services or employment vacancies; or
  - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy <http://masterfix.co.uk/Security & Privacy Policy.html> for further details.

- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
  - Technical Data from the following parties:
    - Analytical data from Google and other SEO companies based inside Europe and the USA.
  - Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Stripe Card Payments based in the USA.
  - Identity, Contact and Professional Data from third parties relating to recruitment such as a recruitment agency, back ground check provider and named referees, who are based in the EU.
  - Identity and Contact Data from publicly available sources such as Credit Reference and CRB checking.

## 5. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you in order to provide the services to you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you. You have the right to withdraw consent to marketing at any time by contacting us.

## 6. Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)

(b) Collect and recover money owed to us	(e) Marketing and Communications	
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

## **7. Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### **Promotional offers from us**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased services and/ or goods from us or if you provided us with your details when you entered a survey or review and, in each case, you have not opted out of receiving that marketing.

### **Third-party marketing**

We will get your express opt-in consent before we share your personal data with any company outside Masterfix Domestic Appliance Repairs Limited for marketing purposes.

### **Opting out**

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchased or other transactions you have had with us.

## **8. Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

## **9. Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **10. Disclosures of your personal data**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 6 above.

- Internal Third Parties as set out in the Glossary in paragraph 19 below.

- External Third Parties as set out in the Glossary in paragraph 19 below.
- Any third party who is a professional adviser to us, such as professional insurers, brokers, auditors, accountants, lawyers and other professional advisers.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
- Any supplier or external party as arranged on our or your behalf, including where this is necessary to provide you with services; and
- Any third party if disclosure to them is required by law or any regulatory authority or if required to protect the rights, property, or safety of Masterfix Domestic Appliance Repairs Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **11. International transfers**

Some of our external third parties are based outside the European Economic Area (**EEA**) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## **12. Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Unfortunately, the transmission of information via the internet is not completely secure and when you submit details via our site or email you are transmitting your information via the internet. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site or via email to us; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### **13. How long will you use my personal data for?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for seven years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data, see paragraph 20 below under the heading "Request erasure" for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

### **14. Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. If you would like to:

- Access, correct, rectify, update, complete, supplement, block or restrict your Personal Information;
- Delete the Personal Information we hold about you;
- Object to or restrict our use of your Personal Information;
- Withdraw your consent to us processing your Personal Information; or
- Transfer your Personal Information from us to another firm, person or business

please contact us at any time at Masterfix Domestic Appliance Repairs Limited, Unit 4, Markham Vale Environment Centre, Markham Lane, Markham Vale, Chesterfield, S44 5HY or 01143 840000 or [service@masterfix.co.uk](mailto:service@masterfix.co.uk).

Further details of your specific rights are set out below in paragraph 20 below (Your Rights).

#### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

#### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security



measure to ensure that personal data 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.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### **15. Other websites**

Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

### **16. Changes to Our Privacy Policy**

This version was last updated on 25<sup>th</sup> May 2018.

Any changes we make to our privacy policy in the future will be posted on our website and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

### **17. Complaints**

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### **18. Contact us**

Questions, comments and requests regarding this privacy policy are welcomed, including any requests to exercise your legal rights, and should be addressed to Masterfix Domestic Appliance Repairs Limited, Unit 4, Markham Vale Environment Centre, Markham Lane, Markham Vale, Chesterfield, S44 5HY or 01143 840000 or [service@masterfix.co.uk](mailto:service@masterfix.co.uk).

### **19. Glossary**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### **Internal Third Parties**

Other companies in the same group or legally connected to Masterfix Domestic Appliance Repairs Limited, whether acting as joint controllers or processors and who are based in the United Kingdom.

### **External Third Parties**

- Service providers acting as processors based within the United Kingdom who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, accountants, bankers, auditors and insurers based within the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

## **20. Your Legal Rights**

You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the

data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.