

Privacy Policy

INTRODUCTION

Sf Stefan is committed to ensuring that your privacy is protected. We ask you to read this Privacy Policy very carefully as it sets out what personal data, we collect about you, how we will use it and who your information may be shared with.

WHO WE ARE

In this Privacy Policy, “we”, “us” and “our” refer to **Sf Stefan, Instalcom House, Manor Way, Borehamwood, WD6 1QH**, company number **07024281**. For the purpose of UK data protection laws, Sf Stefan is the data controller and processes and stores information in accordance with the data protection legislation of the UK and our own policies and procedures.

Details on how you can contact our Data Protection Officer can be found at the bottom of this Privacy Policy.

Sf Stefan is a nationwide contractor delivering safe and professional construction works with in a wide range of sectors including civil engineering, residential and commercial. With many years of experience, we have developed excellent partnerships with main contractors and local authorities alike helping to pave the way and continue to develop innovative solutions. The information we collect and process about you will depend on the services we provide to you.

This Privacy Policy applies to:

- Our website www.sf-stefan.co.uk
- General enquiries received by us, whether by post, phone, email, online, social media or other online activity
- Services provided by Sf Stefan and its subsidiaries not covered by their own privacy policies
- Visits to or use of any of our offices or corporate systems

THE PERSONAL INFORMATION COLLECTED BY US

WHAT INFORMATION DO WE COLLECT?

We collect, process and store information about you in order to provide our civil engineering, general construction, housing, housing management, care and other services. The data we collect may include:

- Identity data, such as your name and address
- Contact data, such as your email address or phone number(s)
- Document data, such as copies of utility bills, passports, benefit statements etc
- Financial data, such as your bank details, payment card details and transactional information
- Family information, such as your next of kin and their contact details
- Photographic information, such as internal and external pictures of properties
- Technical data, such as your IP address, browser information, operating system and other information relating to the device you use to access our websites and other online services

- Preference data, such as your preferences for receiving non-essential communication and marketing materials from us
- Social Media data, such as when you “like” or comment on our services on any of our social media accounts and have made that information publicly available or available to us

Special category data is data that is more sensitive so needs more protection. Where necessary and appropriate, we may collect special category information in order to provide our services and to comply with our legal obligations. Some of the special category information we collect within the scope of this privacy policy may include:

Health information, for instance in order to assess and provide our services

Access information, for instance information relating to vulnerable persons, disabilities, risks to our staff or other information that may affect our access to you or your property in order to provide our services

HOW DO WE COLLECT YOUR INFORMATION?

We may collect your information directly by:

- Being provided with information as a result of a query, complaint, service or other work request or any other matter raised with us by post, email, phone or other format
- The use of one of our websites or mobile apps to raise a request for service or other work item for us
- You applying for a vacancy advertised on our website
- Being provided with information as a result of a visit to one of our websites
- Your participation in an event or activity organised by ourselves or one of our partners
- Receiving from you a business card, marketing enquiry or other request to contact you
- Your visit to one of our locations and/or use of our systems (for instance, our guest Wi-Fi network)
- Other correspondence with you by phone, letter, email or otherwise

We may also be provided with information about or relating to you by a third party, including:

- Organisations for whom we are contracted to provide housing, housing management or care services (for instance housing associations, local authorities)
- Organisations who act on behalf of organisations noted above (for instance, care brokerage services or tenant support services)
- Next of kin, persons to whom you have delegated power of attorney and other persons acting in your interests
- Professional advisors, insurance companies, solicitors and other legal providers who may be acting on behalf of you, us, our clients or other third parties
- Official bodies and other public authorities to whom we do not provide services, including but not limited to law enforcement agencies, the Health and Safety Executive, HM Land Registry
- Social media organisations where you have permitted the organisation to share with us information you have provided to the service or made public in connection with that service

HOW DO WE USE YOUR INFORMATION?

We use the information provided to us to fulfil various duties and obligations as set out below:

Legal basis for collection of data	Why we need your data and how we will use it
Processing necessary for our legitimate business interests	<p>To register you as a new tenant, service user or client and identify the services we need to provide</p> <p>To process and complete any job, work item or request or deliver other services to you as contracted by a third party</p> <p>To respond to your query, complaint, issue or any matters raised with us or via one of our agents</p> <p>To process payments owed to us and/or relating to or resulting from the delivery of our services (especially where our contract is with a third party such as a Housing Association or Local Authority and not with you as an individual)</p> <p>For internal business processing and operations including but not limited to quality assurance, management information, audit, governance and financial processes</p> <p>To develop, improve and manage our websites</p> <p>To request feedback or customer satisfaction information relating to our performance of works and/or services</p> <p>To assist you in understanding and applying for grants and other sources of funding available to you for works and other services that we may provide</p> <p>To enable us to provide access to our offices and corporate systems</p>
For the performance of your contract with us	To deliver services to you as directly contracted with you
Where you give us consent	To invite you to workshops, seminars, conferences and other events organised by ourselves or our partners
To comply with our legal and regulatory obligations	<p>To enable us to provide access to our offices and corporate systems</p> <p>Processing of information where the law requires us to do so</p> <p>To respond to claims, accident investigations and other legal procedures where we are required to provide information</p>

We will only use your information for the purpose(s) it was collected for, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose or where there is a legal requirement for us to use that information. We may process your information without your knowledge or consent only where this is required or permitted by law.

WHO WE SHARE YOUR INFORMATION WITH

In order to deliver our services and fulfil our legal obligations, we may share your information with:

Client organisations to whom we are contracted to provide services and/or who are funding services being provided by ourselves, including -

- Housing Associations
- Local Authorities

Individuals whom you have agreed we should share information about you with or who are acting in your interest, such as your next of kin or power of attorney

Third parties instructed by us to provide services on our behalf, such as –

- Housing and care subcontractors
- Organisations who conduct customer satisfaction and feedback services
- Our professional advisors (including legal services providers, banks, auditors)
- Insurance companies and claims handling organisations
- Debt collection and management agencies
- Recruitment and HR service providers
- Marketing and event management companies
- Communications and PR management companies
- Analytics, search engine analytics and other agencies who assist us in the improvement of our websites
- Our quality assurance assessors

Third parties with whom we are working to provide services or who we are a member body of or are connected to, including but not limited to -

Third parties to whom we may choose to sell, transfer or merge parts of our business or assets with

Third parties who have a statutory duty or perform tasks in the public interest as set out in law, including but not limited to –

- Official bodies such as HM Land Registry and Companies House
- Health and Safety Executive
- Information Commissioners Office
- Law enforcement and other authorities who require reporting of processing activities in certain circumstances

TRANSFER OF YOUR INFORMATION OUTSIDE THE EEA

Sf Stefan is a UK based business with operational bases in the UK only, however some of the data we collect from you may be transferred to third parties who will store data outside of the European Economic Area (EEA). Examples of where this may occur include where we use a cloud IT service to manage and deliver operational and business processes (such as Dropbox, Hosted Exchange or our HR system). We endeavour to only instruct suppliers that can provide the same level of data security that we have here in the UK and where it is necessary to transfer your personal information to a country outside of the EEA which has not been approved by the European Commission, we will ensure that appropriate safeguards are in place. This will ordinarily be through the use of approved EU standard contractual clauses or an approved framework, such as the U.S. Privacy Shield, that are designed to help safeguard your privacy rights and give you remedies in the event of your information being misused.

HOW LONG YOUR INFORMATION WILL BE KEPT FOR

We will keep your information for as long as is necessary to provide services to you, to fulfil our legitimate business interests or to meet our legal obligations. In order to meet our legal obligations, it maybe we need to keep your information even when you are no longer actively receiving services from us.

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the information, the purposes for which we were originally processing it, the potential risk of harm from its unauthorised disclosure or loss and any legitimate interests or legal obligations its retention may be required to meet.

Your information will be kept in line with our Retention Policy and internal procedures.

YOUR RIGHTS

You have various legal rights in relation to the personal information that we collect and process:

- A right to access the information that we process about you, together with information about why and how we are using it, who we have shared it with and other information
- A right to ask us to rectify any information we hold about you that is inaccurate or incomplete
- A right to ask us to erase information if we no longer have a legal basis for processing or storing it (please note that this right can only be exercised in certain circumstances and, if you ask us to erase your information and we are unable to do so, we will explain why not)
- A right to ask us to restrict processing your information in certain circumstances
- A right to ask us to transmit ('port') information about you in a structured, commonly used and machine-readable format
- A right to object to us using particular information, or using it in a particular way
- A right to object to us using and storing your information for direct marketing purposes

If you would like to exercise any of the above rights, you can do so by contacting our Data Protection Officer via the contact details at the end of this privacy policy or by speaking to your local office or regular contact point. We may require you to provide proof of identity, address or other details. Where we are unable to fully action your request, we will explain why and outline any next steps.

We do not use automated decision-making processes within the scope of this privacy policy.

For more information on your privacy rights under current data protection law, including the circumstances under which they apply, we recommend you visit the Information Commissioner's Office website at: www.ico.org.uk

KEEPING YOUR INFORMATION SECURE

We take seriously the need to keep the personal information we process secure and have in place various organisational and technical measures to prevent information being accidentally lost, stolen, accessed or disclosed in an unauthorised way. We limit access to your information to those with a genuine business need to see it so those processing your information will do so in an authorised manner and subject to a duty of confidentiality.

We maintain various industry standard security technologies and tools to prevent and detect unauthorised access and amendments to our systems, including firewalls and other perimeter devices, anti-virus and threat protection systems and email and internet security software.

We maintain policies and procedures to help ensure a consistent approach to security best practices and behaviours across our company, including keeping paper records safe, physically securing buildings, the safe transfer and handling of data and the secure use of our systems.

Unfortunately, the transmission of information via the internet is not completely secure and while we do our best to protect information you transmit to us via our websites and email, we cannot guarantee its security and transmission is at your own risk.



Get Safe Online (www.getsafeonline.org) provide more detailed information on how to protect your information and devices against fraud, identify theft, viruses and other online treats and is supported by HM government and leading businesses.

HOW TO COMPLAIN

If you are concerned about any aspect of how we handle your personal information or your rights as outlined above, you can contact our Data Protection Officer on the details below. Alternatively, you can log a complaint directly with the UK's supervisory authority, the Information Commissioner. The address for the Information Commissioner's Office is:

The Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. The ICO website is available at: www.ico.org.uk

HOW TO CONTACT US

Our Data Protection Officer can be contacted by email info@sf-stefan.co.uk or via post by writing to

**The Data Protection Officer,
Instalcom House,
Manor Way,
Borehamwood WD6 1QH
Hertfordshire**

A handwritten signature in black ink, appearing to read 'Stefan Voloseniuc', written over a horizontal line.

**Signed:
Stefan Voloseniuc
Managing Director**

Dated: 15th May 2020