

Heron Bros Privacy Statement

1. INTRODUCTION

Protecting personal data is important to Heron Bros. This Privacy Statement sets out how we collect, use, store, share and protect personal data in compliance with Data Protection legislation.

1.1 Company Information

Heron Bros, a company registered in Northern Ireland with the company registration number NI 016051 and having our place of business at 2 St Patrick's Street, Draperstown, N Ireland, BT45 7AL. Further information can be found at www.heronbros.com

1.2 Contact us

If you have questions as to the manner in which your personal data is being handled or if you require any further information you can contact the Data Protection Officer using the details below:

Data Protection Officer
2 St Patrick's Street
Draperstown
BT45 7AL
Email: info@heronbros.com

1.3 Statement Review

This Statement will be regularly reviewed to ensure we continue to meet our obligations in processing your personal data and protecting your privacy. In order to do so we reserve the right to update, modify and amend this Statement at any time as required. We would recommend that you check back regularly to keep informed of any updates. We will not make any significant changes to the Statement without informing you.

1.4 Protecting Your Information

We are committed to protecting your personal data and to implementing appropriate technical and organisational security measures to protect it against any unauthorised or unlawful processing and against any accidental loss, destruction, or damage and to ensure data is destroyed/deleted when no longer required.

2. DATA WE COLLECT

In order to provide construction and associated services and provide you with information on these products and services we need to collect a number of categories of personal data through a number of channels including from you, third parties, other suppliers, and credit reference agencies. We obtain this personal data during the negotiation process, marketing or through our on-going management of your account.

These personal data categories include: Name, address, contact details such as telephone number, mobile phone number, email address, date of birth, bank details, credit information, records of payments and any arrears, employment status, marketing preferences, telephone recordings, CCTV recordings website usage (on www.heronbros.com), IP address.

In certain circumstances and as part of our health and safety requirements we may collect special categories of personal data including any disabilities or special needs information necessary to support the provision of service.

3. HOW WE USE YOUR INFORMATION

We will use your personal data to provide construction and services and to allow us to better manage your account. In particular we may use your personal data for the following purposes:

3.1 Account Management

In order to set up and administer your account and manage your contact with us, we are required to process your personal data. This involves processing personal data for the purpose of account set up, monitoring, identity verification and managing your account including obtaining credit references where necessary, billing purposes and processing payments.

Legal Basis: The processing is necessary for the performance of your contract to which the data subject is party to or in order to take specific steps prior to you entering into a contract.

Legal Basis: The processing is necessary to comply with our legal obligations.

Legal Basis: The processing is necessary for our legitimate interests or those of a third party. It is within Heron Bros' legitimate interest to use certain personal data to establish, maintain and review an account to allow Heron Bros to better manage customer's accounts, enforce rights set out in the terms & conditions of supply, and to ensure customers are provided with the most appropriate products and services.

3.2 Customer Support

In order to respond to queries and manage and investigate any complaints we are required to process your personal data. If you contact our Team or if we contact you we will use personal data such as account information and contact history. We may monitor and record such communications, instant messaging (web chat), social media, email and other electronic communication to help investigate any complaints and for training purposes.

Legal Basis: The processing is necessary for the performance of a contract to which you are party to in order to take specific steps prior to you entering into a contract.

Legal Basis: The processing is necessary to comply with our legal obligations.

Legal Basis: The processing is necessary for our legitimate interests or those of third party. It is within Heron Bros' legitimate interest to use certain personal data to establish, maintain and review an account to allow Heron Bros to better manage customer's accounts, enforce rights set out in the terms & conditions, and to ensure customers are provided with the most appropriate products and services and that customer complaints are resolved appropriately.

3.3 Marketing

In accordance with your marketing preferences, from time to time we may provide you with information on our products and services. In order to provide you with relevant products, services, offers, promotions and to continually improve our customer services we may use personal data to analyse customer behaviour and customer data relating to you.

Depending on your marketing preferences and as otherwise permitted by law we may contact you by:

(a) Non-electronic means, including by post or in person; and

(b) Electronic means, including live telephone calls, email, SMS (texts) or multimedia messaging, through your smart phone applications, web chat and chat services, pre-recorded telephone messages, social media (e.g. Facebook and Google)

Legal Basis: The processing is necessary for our legitimate interests It is within Heron Bros' legitimate interest to provide you with information on products and services including information that we have tailored to your interests.

If you wish to change your marketing preferences you can do so at any time by writing to us at **Heron Bros, 2 St Patrick's Street, Draperstown** emailing us at info@heronbros.com.

3.4 Credit Reference Checks & Fraud Prevention

In order to enter into an agreement with you and assess any level of risk we may carry out necessary credit reference checks.

Legal Basis: The processing is necessary for entering into or the performance of a contract to which you are subject.

Legal Basis: The processing is necessary to comply with our legal obligations.

Legal Basis: The processing is necessary for the legitimate interests of Heron Bros. It is within Heron Bros' legitimate interest to carry out such processing to assess creditworthiness and protect Heron Bros from fraud.

3.5 Improving Our Products & Services

In order to improve our products, services and customer interaction we may carry out customer surveys and market research which involves the processing of personal data.

Legal Basis: The processing is necessary for our legitimate interests. It is within Heron Bros' legitimate interest to provide you with the best customer experience by ensuring that we continually improve our products and service offerings.

3.6 Debt Management

In order to appropriately manage any debt issues if they were to occur, Heron Bros may be required to process personal information.

Legal Basis: The processing is necessary for the performance of a contract to which you are a party to or in order to take specific steps prior to entering into a contract.

Legal Basis: The processing is necessary for our legitimate interests. It is within Heron Bros' legitimate interest to use certain personal data to help manage a debt issue and enforce rights set out in the terms & conditions.

3.7 Website Statistics

Like most websites, we gather statistical and other analytical information of all visitors to our website including cookies and click trails. We use the data gathered to get a better understanding of where our visitors come from and to help us better design and organise our website and for the purposes set out below at Customer Preferences and Account.

Legal Basis: The processing is necessary for our legitimate interests. It is within Heron Bros' legitimate interest to provide you with the best customer website experience by ensuring that we continually improve our processes and website.

3.8 Customer Preferences And Account History

To manage and administer any products or services we provide, to develop and manage our brands, products and services and to develop and offer new products and services, we may review customer preferences and account information.

Legal Basis: The processing is necessary for our legitimate interests or those of a third party. It is within Heron Bros' legitimate interest to provide you with the best customer experience and offers relevant to you.

3.9 Recruitment

If you submit a job application, we will use your personal data for recruitment-related purposes, which may include contacting you via email, telephone, SMS or post.

Legal Basis: The consent of the individual.

Legal Basis: The processing is necessary to comply with legal obligations to which we are subject under our employment law.

4. SHARING YOUR INFORMATION

There are a number of circumstances in which we may share your personal data within Heron Bros and other parties. Below is a list of such potential recipients or categories of recipients with whom we may share information:

- In order to carry out credit checks when entering into an agreement we may share personal data with financial institutions & credit reference agencies.
- In order to meet legal and regulatory requirements we may share personal data with fraud prevention agencies.
- For debt management purposes we may in certain cases be required to share personal data with debt collection agencies or other representatives.
- We may disclose information when required by law or legal process for the administration of justice, to protect your vital interest, for investigations by law enforcement or regulatory bodies, to protect and defend Heron Bros' property and legal rights or by order of a valid order from a court or law enforcement agency.
- Organisations who act as service providers to Heron Bros such as providers of telecommunications, postal services, records storage, data storage, document production and destruction, IT services and security, fraud detection, marketing and market research, and making and receiving financial payments.
- We may pass personal data to our agents and service providers and group companies when relevant for these purposes. This may involve passing your personal data outside of the European Economic Area and any such recipients will be bound to comply with the European Commission standard contractual clauses for the transfers of data outside the EEA.

5. RETENTION OF YOUR INFORMATION

We will retain your personal data only for as long as is necessary for the purposes for which it was collected and in order to meet the legal and business requirements of managing your customer account and experience with us. In particular:

- We will retain personal data that is necessary for us to provide you with a product or service that you have requested or purchased for as long as it takes us to provide that product or service;
- We will retain your contact details for marketing purposes for as long as we have your permission to send you marketing information or for as long as we are permitted to do so, subject to your right to object at any stage;
- We will retain records of any transactions you enter into with us or products or services you receive for up to seven years after the date of the transaction. This is so that we can respond to any complaints or disputes that arise in that period;
- We will retain any financial transaction information for seven years after the date of those transactions; and
- We will retain other personal data necessary for us to do so to comply with our regulatory and legal requirements.

6. YOUR RIGHTS

The General Data Protection Regulation provides you with a number of rights under the legislation as a data subject. We will respond to your requests within one month of the receipt of your request or inform you in circumstances where an extension may be required.

6.1 Right Of Access

You have the right to be provided with details of the processing of your personal data and to obtain a copy of the personal data we hold about you, subject to applicable exemptions under data protection legislation. In order to make an access request please send your request in writing to the details below:

Data Protection Officer
Heron Bros
2 St Patrick's Street
Draperstown
Email: info@heronbros.com

To help us better deal with your request please provide us with the information necessary to identify you (name, address, account number) and to identify the personal data you require.

6.2 Right To Rectification

If the personal data we hold on you is inaccurate or incomplete you have the right to rectify such personal data and we would encourage you to ensure the personal data we hold on you is kept as up to date and accurate as possible.

6.3 Right To Erasure

In certain circumstances you have the right to request the deletion of your personal data where there is no compelling reason for us to continue processing it. This is not an absolute right but can include circumstances such as:

- Where your personal data is no longer necessary in relation to the purpose for which it was processed.
- When the processing in question is solely based on consent and consent is withdrawn.
- When you object to the processing on grounds relating to your particular situation and there is no overriding legitimate interest to continue the processing.
- The personal data has to be erased in order to comply with a legal obligation.
- Your personal data has been processed unlawfully.

6.4 Right To Restrict Processing

In certain circumstances you can request the restriction of the processing of your personal data where you contest the accuracy of the information; where you object to processing which is based on legitimate interests; where the processing is unlawful and you wish to restrict the processing rather than seek erasure; or where we no longer require to retain your personal data but you wish the personal data to be held while you establish, exercise or defend a legal claim.

6.5 Right To Data Portability

In circumstances where the personal data you have provided to us in a structured, commonly used and machine-readable format is based on your consent or for the performance of the contract and where the processing is carried out by automated means, you have the right to request that such personal data be provided to you or transmitted directly to another organisation.

6.6 Right To Withdraw Consent

Heron Bros processes your personal data using a number of legal bases apart from consent including entering into a contract with you in order to provide services. If however we are processing your personal data on the legal basis of consent you have the right to withdraw your consent at any time. If you withdraw your consent, we will no longer be able to carry out processing based on your consent. However by withdrawing your consent it does not invalidate any processing which was undertaken prior to the withdrawal of your consent.

6.7 Right To Object To Processing

You have the right to object to processing based on legitimate interests; direct marketing (including profiling for the purpose of direct marketing). Where we have indicated that we are processing your personal data based on legitimate interest, you are entitled to object to such processing on grounds relating to your particular situation. We will stop processing your personal data unless we can demonstrate compelling legitimate grounds for the processing which overrides your interests, rights and freedoms or where the processing is necessary for the establishment, exercise or defence of legal claims. If you wish to object to receiving direct marketing contact us and we will stop processing your personal data for direct marketing purposes.

6.8 Automated Decision Making Including Profiling

You have the right not to be subject to automated individual decision making, including profiling, which produce legal effects concerning you or similarly significantly affects you unless it is necessary for the entry into or performance of a contract, authorised by EU or member state law; or based on your explicit consent.

6.9 Right To Lodge A Complaint With ICO

You have the right to lodge a complaint with the Information Commissioner's Office:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113

Last updated August 2021