

# Privacy Policy Statement

At Ptarmigan Homes we are committed to protecting the privacy of our customers and website visitors. Our relationship with you is valuable and we understand the importance you place on the privacy and security of information which personally identifies you. In that respect, and whether you are a first-time visitor to our website or a regular user, we take your privacy seriously. Please read the following in order to learn more about our privacy policy and our information gathering and dissemination practices.

In this privacy policy we explain how we collect and use your personal information. 'We' means Ptarmigan Homes Ltd, Castle House, Fairways Business Park, Inverness. We are the data controller for the purposes of the Data Protection Act 1998 and the EU General Data Protection Regulation.

You can use the contact details on our website, to contact us with any questions you may have about privacy or data protection.

We'll use your personal information in accordance with the Data Protection Legislation.

Please note that links from our website may take you to external websites not covered by this policy. We recommend that you check their privacy policies yourself before submitting any personal information. We will not be responsible for the content, function or information collection policies of these external websites.

## What information do we collect about you and how do we collect it?

You are not required (by law or by any contract with us) to provide personal information to us via this website. We will only require you to provide personal information to us where it is necessary for us to provide you with a service at your request.

### Information you provide to us

We may receive personal information about you whenever you visit our website or contact us. For example, by doing the following:

- Completing our Contact Form: ( <http://ptarmiganhomes.com/contact.php> or <http://ptarmiganhomes.com/quickquote.php>)
- Enquiring about our products and services
- Enquiring about, or applying for, job vacancies
- Using and browsing our website
- Telephoning, texting, writing by post or emailing us at [info@ptarmiganhomes.com](mailto:info@ptarmiganhomes.com)

### This information may include the following:

- Normal identification information, such as your title and full name
- Contact information, such as your postal address, email address and telephone number
- Additional information relevant to your use of our site and services, such as your marketing preferences and feedback
- In respect of our products and services details of your property, your requirements, the details of your installation, your legal & project funding details and your payment details
- In respect of job applications, your CV including details of your education and employment history (and any other information which you may choose to provide to us with your CV)

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, 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 offenses.

Our Website is not intended for children and we do not knowingly collect data relating to children.

## **Information we collect on our website**

There are various technologies, including one called "cookies" which can be used to provide you with tailored information from a website. A cookie is a small data file that certain websites write to your hard drive when you visit them. The only personal information a cookie can obtain is information a user supplies themselves. A cookie can't read data off your hard disk or read cookie files created by other sites. Cookies, however, enhance our website performance in several ways including providing a secure way for us to verify your identity during your visit to our website and personalising your experience on our site making it more convenient for you. You can refuse cookies by turning them off on your web browser and you do not need to have cookies turned on to successfully use our service. Most browsers are defaulted to accept and maintain cookies and you can set your browser to notify you when you receive a cookie, giving you the chance to decide whether to accept it or not. See [www.aboutcookies.org](http://www.aboutcookies.org) for more information.

When you visit our website, we may collect the following information:

- Which pages you view, and which links you follow
- Your IP address and general location
- Details of the hardware and software that you are using to access the site
- If you are a new or returning customer to the website

## **Website Usage Data**

With or without cookies, our website keeps track of usage data, such as the source address that the page request is coming from (i.e. your IP address, domain name), date and time of the page request, the referring website (if any) and other parameters in the URL (eg search criteria). We use this data to better understand website usage, so we know what areas of our website users prefer. This information is stored in log files and is used for aggregated and statistical reporting but is not attributed to you as an individual.

## **Information we collect about you from other sources**

We may collect information about you from other sources. This may include the following:

- Publicly available information, from sources such as Local Authority E-Portals, Companies House
- Information you have shared publicly, including on social media (particularly in respect of job applications)
- Referrals from Independent Networks

This list is not exhaustive, and, in specific instances, we may need to collect additional data for the purposes set out in this Policy.

## **Third-party links outside of our control**

This website may include links to third-party websites, plug-ins and/or applications. 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.

## **How do we use your personal information?**

We take data protection law seriously, so below we have set out exactly how and why we use your information, and what our legal basis is to be able to use your information in each way.

## **Providing our services**

It is necessary for us to use personal information about you to enter into and perform the contracts that we make with you, such as when you order our goods or services. Using your information in this context is necessary so that we can:

- Provide you with information about our products and services, including our availability
- Supply and install our products, provide our services and deal with payments in relation to those
- Verify your identity
- Deal with any complaints you may have
- Contact you about any changes that we make to our products or services
- Administer our website, including troubleshooting problems, analysing statistics, conducting research and tests and keeping the site secure

If you enquire about, or apply for, a job vacancy, it is necessary for us to use your personal information as part of the recruitment process, in order to assess your suitability for a role.

## **Telling you about other products or services that we think may be of interest to you**

We may use your information to identify and tell you about our products or services that we think may be of interest to you. We will only do this where you have informed us that you would like to receive marketing communications.

We may also use your information to invite you to participate in market-research. If we do contact you about market-research, you do not have to participate. If you tell us that you do not want to receive market-research communications, we will respect this.

Whether you choose to receive marketing communications, or market-research communications is entirely up to you. You can choose to receive both, none, or just one or the other. Your choice will not affect any products or services that you have purchased from us, nor will it affect any quotes for products or services you buy in future.

## **Telling you about products or services that are like ones that you have already purchased**

If you have already bought a product or service from us, or you have already obtained a quote from us, we may contact you with some information about products or services that are similar.

We will only contact you by phone or email and you can choose not to receive these at any time.

## **Making our business better**

We always want to offer the best products, services and experience that we can. Sometimes this means we may use your information to find ways that we can improve what we do, or how we do it.

In this context, we will only use your information where it is necessary so that we can:

- Review and improve our existing products and services and develop new ones
- Review and improve the performance of our systems, processes and staff (including training)
- Improve our site to ensure that content is presented in the most effective manner for you and for your computer
- Measure and understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you

## **Contacting you**

We want to stay in touch with you! Sometimes we may need to use the information that we have about you in order to respond to your questions or let you know about important changes.

We will only use your information in this respect where it is necessary so that we can:

- Interact and respond to any communications you send us, including where you use our Contact Form, and any social media posts that you tag us in
- Let you know about any important changes to our business or policies

## **Verifying your identity**

We may use your information where it is necessary for us to do so in order to meet our legal obligations or to detect and prevent fraud, money-laundering and other crimes.

## **Protecting you and others from harm**

We may use your information where it is necessary to protect your interests, or the interests of others. This may include in the event of criminality such as identity theft, piracy or fraud.

## **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 certify your qualification or provide you with copies of any certificates you request). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

## **Using 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;
- 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; and
- 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.

## **Purposes for which we will use your personal data**

We only use personal information for the purposes outlined above and data will only be held for the timeframe necessary to support these purposes. We may use your personal information:

- to carry out our obligations arising from any contracts entered between you and us including in connection with providing products or services;
- to put in place any insurance backed guarantees relating to the products and installation you have purchased;
- to manage and administer the relationships;
- to comply with our legal obligations and with instructions from 3rd parties or regulators, court orders or protect our legal interests.

- to notify you about changes to our services and to otherwise communicate with you; for example, we will use your contact details in order to respond to any queries that you submit to us;
- to train our staff to continuously improve our services; and
- to analyse our products, services and marketing activity.

If you tell us we can, we may also use your personal information to provide you with information about services, promotions and offers that may be of interest to you. We may use your personal information to identify additional products and or services that are likely to be of interest to you.

We need all the categories of information listed above to allow us to enter into and perform our contract with you, to enable us to comply with legal obligations, and in order to pursue legitimate interests of our own or those of third parties (provided your interests and fundamental rights do not override those interests). The situations in which we will process your personal data are listed below.

- Providing our services
- Put in place the necessary insurance backed guarantees
- Interact with third parties in order to ensure the products and services have been delivered to your satisfaction
- Interact with regulators
- Verifying your identity
- Deciding to supply our products and services
- Administering the contract, we have entered with you
- Dealing with any complaints you may have
- Logistics management and planning, including accounting and auditing
- Planning for the termination of our contract
- Making repairs, alterations and improvements to the products or services supplied
- Dealing with legal disputes involving you
- Complying with health and safety obligations
- To detect and prevent fraud, money-laundering and other crimes
- To review and improve the performance of our systems, processes and staff (including training)
- To interact and respond to any communications you send us, including social media posts that you tag us in
- To let you know about any important changes to our business or policies
- To ensure that the information that we hold about you is accurate and up to date
- To protect your interests, or the interests of others (such as in the event of criminality such as identity theft, piracy or fraud)

## **Change of purpose**

We will only use your personal information 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 we need to use your personal information 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 information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## Who do we share your personal information with?

### Sharing your information within our company

We share the information that you provide to us with our staff so that we can provide our products and services to you.

### Sharing your information with third parties

We may share your data with selected third parties. For example, we will share your data with:

- Our supply chain for the purpose of providing our service and product or put in place a separate insurance backed 10-year guarantee;

There are certain exceptional circumstances in which we may disclose your information to third parties. This would be where we believe that the disclosure is:

- Required by the law, or in order to comply with judicial proceedings, court orders or legal or regulatory proceedings
- Necessary to protect the safety of our employees, our property or the public
- Necessary for the prevention or detection of crime, including exchanging information with other companies or organisations for the purposes of fraud protection and credit risk reduction.
- Proportionate as part of a merger, business or asset sale, if this happens we will share your information with the prospective seller or buyer involved

## How long do we keep your personal information?

We will only store your personal information for as long as we need it for the purposes for which it was collected. Where we provide you with any service (including where you have purchased products from us), we will retain any information you provide to us at least for as long as we continue to provide that service to you.

If you do not accept our quote, we will retain your information for 36 months and may contact you during that period to remind you that it is outstanding. After this time frame we will delete your data unless you ask us not to. Where you accept a quote, we will retain your information for so long as it takes to complete the installation of your order and thereafter for so long as you have a full and valid insurance backed guarantee in place and/or a service and maintenance contract with us in relation to your installation.

If you apply for a job vacancy (or otherwise send us your CV) we will retain your CV (and any publicly available information, for example from social media) for a period of 36 months. If we are considering you for a role, we may retain this information for longer than that period.

## How do we protect your personal information?

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this policy.

We try to ensure that all information you provide to us is transferred securely via the website. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; 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.

All information you provide to us is stored on secure servers.

## Accessing or amending your personal data

If you think the personal information, we hold about you is inaccurate or incorrect, you can request that we correct this information.

You can choose to stop receiving marketing communications from us by contacting us at [info@ptarmiganhomes.com](mailto:info@ptarmiganhomes.com) describing your preferences.

Please note that, even if you choose not to receive this information, we may still use your personal information to provide you with important services communications.

Even if we already hold your personal data, you still have various rights in relation to it. We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of any applicable laws. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

## What rights do you have in respect of your personal information?

### You have the right to be informed

We have a legal obligation to provide you with concise, transparent, intelligible and easily accessible information about your personal information and our use of it. We have written this policy to do just that, but if you have any questions or require more specific information, you can get in touch by emailing [info@ptarmiganhomes.com](mailto:info@ptarmiganhomes.com).

### You have the right to access your personal data

You have the right to ask us to confirm whether we hold any of your personal information. If we do, you have the right to have a copy of your information and to be informed of the following:

- Why we have been using your information
- What categories of information we were using?
- Who we have shared the information with?
- How long we envisage holding your information

In order to maintain the security of your information, we will have to verify your identity before we provide you with a copy of the information we hold.

The first copy of your information that you request from us will be provided free of charge, if you require further copies, we may charge an administrative fee to cover our costs.

### You have the right to correct any inaccurate or incomplete personal data

Where you have requested a copy of the information, we hold about you, you may notice that there are inaccuracies in the records, or that certain parts are incomplete. If this is the case, you can contact us so that we can correct our records.

### You have the right to be forgotten

There may be times where it is no longer necessary for us to hold personal information about you. This could be if:

- The information is no longer needed for the original purpose that we collected it for
- You withdraw your consent for us to use the information (and we have no other legal reason to keep using it)
- You object to us using your information and we have no overriding reason to keep using it
- We have used your information unlawfully
- We are subject to a legal requirement to delete your information

In those situations, you have the right to have your personal data deleted. If you believe one of these situations applies to you, please get in touch by emailing [info@ptarmiganhomes.com](mailto:info@ptarmiganhomes.com).

## **You have the right to have a copy of your data transferred to you or a third party in a compatible format**

Also known as Data Portability, you have the right to obtain a copy of your personal data for your own purposes. This right allows you to move, copy or transfer your personal data more easily from one IT system to another, in a safe and secure way.

If you would like us to transfer a copy of your data to you or another organisation in a structured, commonly used and machine-readable format, please contact us. There is no charge for you exercising this right.

We do not transfer or store any personal data outside the EU.

## **You have the right to object to direct marketing**

You can tell us at any time that you would prefer that we do not use your information for direct marketing purposes. If you would not like to receive any direct marketing from us, please contact us and we will stop sending direct marketing immediately.

## **You have the right to object to us using your information for our own legitimate interests**

Sometimes, we use your personal information to achieve goals that will help us as well as you. This includes:

- When we tell you about products or services that are like ones that you have already bought
- When we use your information to help us make our business better
- When we contact you to interact, communicate or let you know about changes we are making

We aim to always ensure that your rights and information are properly protected. If you believe that the way we are using your data is not justified due to its impact on you or your rights, you have the right to object. Unless we have a compelling reason to continue, we must stop using your personal data for these purposes.

In order to exercise your right to object to our use of your data for the purposes above, please contact us.

## **You have the right to restrict how we use your personal data**

You have the right to ask us to stop using your personal data in any way other than simply keeping a copy of it. This right is available where:

- You have informed us that the information we hold about you is inaccurate, and we have not yet been able to verify this
- You have objected to us using your information for our own legitimate interests and we are in the process of considering your objection
- We have used your information in an unlawful way, but you do not want us to delete your data
- We no longer need to use the information, but you need it for a legal claim

If you believe any of these situations apply, please contact us.

## **Changes to our Privacy Policy**

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

## **Complaints**

If you wish to make a complaint about our collection or use of your personal data, please contact us in the first instance so that we may seek to resolve your complaint.

You have the right to lodge a complaint with the Information Commissioner's Office (ICO), the statutory body which oversees data protection law in the UK. Please visit the ICO website if you wish to lodge a complaint with the ICO.