



## Q 307 Privacy Policy

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### Introduction

G D Surveyors Ltd are committed to protecting and respecting the privacy and security of our clients and site visitors. This Privacy Policy sets out how we process and protect any personal information that you provide to us to enable us to deliver you with quotes and services.

All your personal information shall be held and used in accordance with General Data Protection Regulations (EU 2016/679 ('GDPR'))

G D Surveyors Ltd is the Data Controller under the GDPR. This means that we determine the purposes and means of processing personal data.

### Data Controller Contact Details: -

In the event of any queries about how we use personal data or, in the event of a complaint, in the first instance please contact our Data Controller at:

East Barn.  
Furnace Lane,  
Furnace Farm,  
Lamberhurst  
E: [mail@gdsltd.co.uk](mailto:mail@gdsltd.co.uk)  
T: **01892 538700**

### Data Protection definitions: -

- **Data processor** – A processor is responsible for processing personal data on behalf of a controller.
- **Data subject** – Identifiable person
- **Categories of data:** Personal data and special categories of personal data
  - a) **Personal data** – The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example, name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.
  - b) **Special categories personal data** – The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.
- **Processing** – means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.



- **Third party** – means an identifiable or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

### **Personal data and basis for collection**

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 as follows:

- Identity Data includes first name, last name, marital status, title.
- Contact Data includes billing address, delivery address, email address and telephone numbers.
- Financial Data includes bank account (provided by you for refunds and payments).
- Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
- Usage Data includes information about how you use our services or submit an enquiry or query through our website.
- Marketing and Communications includes your preferences in receiving marketing from us and your communication preferences.

### **The purpose(s) of processing your personal data**

You may give us information about you by corresponding with us by phone, letter, and e-mail or by filling in forms on our website [www.gdsLtd.co.uk](http://www.gdsLtd.co.uk) We use your personal data for the following purposes:

- To process our services provided to you as Surveyors.
- To fulfil a legal or contractual obligation if there is a legitimate business interest or where you agree to it.
- To maintain our own accounts and records
- To meet our statutory obligations

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

- Direct from you, your representative or information you have made public.
- From other persons or organisations, in relation to the service we provide.

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

Where we need to collect personal data by law, or under the terms of our contract with you and you fail to provide that data when requested, we may not be able to perform the contract. In this case, we may have to cancel the contract with you, but we will notify you if this is the case at the time.

### **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 may 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.



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 client and verify your identity	(a) Identity (b) Contact	Performance of a contract  Consent (for use of special categories of data)
To perform credit checks	(a) Identity (b) Contact	Legitimate interests
To process and deliver the Services including:  (a) Manage payments, fees and charges  (b) Collect and recover money owed to us  (c) Contacting you and corresponding about the Services	(a) Identity (b) Contact (c) Financial (d) Transaction	Performance of a contract  Necessary for our legitimate interests (to recover debts due to us)
To respond to queries and enquiries	(a) Identity (b) Contact	Legitimate interests
To undertake any marketing to you	(a) Identity (b) Contact	Legitimate interests



### **How your personal data may be shared**

Personal data that we collect in accordance with this Privacy Policy, may be shared as follows:

- with our contractors or sub-consultants who we engage to provide services in connection with your contract who comply with the terms of this Privacy Policy;
- with third party consultants who comply with the terms of this Privacy Policy;
- where we are under a duty to disclose your personal data to comply with any legal obligation, or to enforce or apply our terms and conditions and other agreements;
- with third party debt recovery agencies;
- to protect the rights, property, or safety of our staff and/or contractors/ sub-consultants, our clients, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and for compliance with laws; and
- with 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.

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.

### **How we store personal data**

Our primary method of storing personal data is within the United Kingdom. We do not transfer data outside of the European Economic Area (EEA).

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, contractors and other third parties who have a business or lawful need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

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.

### **Personal Data Retention**

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.

Generally, we will delete personal data:

- collected as part of services provided to you no later than twelve years after completion of contract;
- collected as part of quotes which are not taken up, no later than three years after the date of the quote.

### **Automated decision Making**

We do not use any form of automated decision making in our business.



## Your rights

Under certain circumstances, you have rights under the Data Protection Legislation in relation to your personal data. These include the right to:

- request access to your personal data;
- request correction of your personal data;
- request erasure of your personal data;
- object to processing of your personal data;
- request restriction of processing your personal data;
- request transfer of your personal data; and
- right to withdraw consent.

To exercise any of the above rights please email your request to [mail@gdsltd.co.uk](mailto:mail@gdsltd.co.uk)

Where you exercise your right to erasure or where information is deleted in accordance with our retention policy, please note that after the deletion of your personal data, it cannot be recovered, so if you require a copy of this personal data, please request this during the period we retain the data.

Where you exercise your right to request access to the information we process about you, 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.

We will try to respond to all legitimate access 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.

## Use of cookies by us

We have a separate cookie policy which is available on our website.

## Changes to this Privacy Policy and your duty to inform us of changes

As and when necessary, changes to this Privacy Policy will be posted here. This Privacy Policy was last updated on 21<sup>st</sup> April 2023.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## Directors

Steve Roper

Graeme Dewar

Matt Mather

**On behalf of G D Surveyors Limited  
April 2024**