

Privacy Policy in compliance with Data Protection act

About this policy

This policy describes how we use your personal data when you contact us, use our website www.groundbreaker.co.uk or when we provide services to you. We have provided a copy of this policy to ensure that you understand what personal data we may collect and hold about you, what we may use it for and how we keep it safe. You have legal rights to access the personal data that we hold about you and to control how we use it which are also explained.

You can read, print and save this whole policy or click on the links below to see specific information about: How we use sub-headings to help you find specific information that you may be looking for more easily, including information about:

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Groundbreaker Systems (Steve Leigh & Associates Ltd)

Who we are and how you can contact us

We are Steve Leigh & Associates Ltd, a private company listed in England under company number 3837057: Our registered address is at 3, Fairways, The Common, Stuston, Diss Suffolk IP21 4AB.

You can contact us in writing at the above address or by emailing us at sales@groundbreaker.co.uk If you would like to speak to us please call us at 01379 741993.

Please refer to the sections relating to our data protection officer, your rights to know what personal data we hold and to control how we use it and how to make a complaint for further contact information.

Our data protection officer:

We have appointed a data protection officer who oversees our handling of personal data.

Our Data Protection officer is Mr Steve Leigh. You can contact Steve by using the details provided above and marking your correspondence for the attention of Steve Leigh.

What personal data we collect about you

We collect:

- **Personal data that you provide to us.** There are lots of ways in which you may share your personal data with us, for example, you may register on our website, contact us in connection with goods or services that you would like to buy, or have already bought, from us. The personal data that you provide to us may include your name, address, e-mail address and phone number. Please be assured that financial and credit card information is not gathered or recorded.
- **Personal data that we receive from third parties.** If we work with other businesses or use sub-contractors these parties may collect personal data about you which they will share with us. For example, we may receive details of your credit history from credit reference agencies, have your name and contact details passed to us by a contractor or agency that refers you to us so that we can provide you with our goods or services. We may also receive feedback from a contractor we have instructed to help us provide you with goods or services that you have requested such as a courier company.

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- **Personal data about your use of our website.** This is technical information and includes details such as your IP address, browser type and version, time zone setting, operating system and platform, as well as details of how you navigated to our website together with where you went when you left, and what pages or products you viewed or searched for.

What we use your personal data for:

We use your personal data in the following ways:

- **Personal data that you provide to us is used to:**
 - Provide you with the information, products and services that you request from us.
 - Provide you with marketing information in accordance with your marketing preferences (see [How we use your personal data for marketing](#)).
 - Manage and administer our business.
 - Review and improve our goods and services.
- **Personal data that we receive from third parties** is combined with the personal data that you provide to us and used for the purposes described above.
- **Personal data about your use of our website** is used to:
 - Administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
 - To improve our website to ensure that content is presented in the most effective manner for you and for your computer or mobile device.
 - As part of our efforts to keep our site safe and secure.
 - To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you.
 - To make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

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Cookies:

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website.

When we need your consent to use your personal data:

Whilst we always want you to be aware of how we are using your personal data, this does not necessarily mean that we are required to ask for your consent before we can use it. In the day to day running of our business we may use your personal data without asking for your consent because:

- We are entering into and carrying out our obligations under a contract with you.
- We need to use your personal data for our own legitimate purposes (such as the administration and management of our business and the improvement of our services) and our doing so will not interfere with your privacy rights.

There may be exceptional circumstances in which we may wish to use your personal data for a different purpose which does require your consent. In these circumstances we will contact you to explain how we wish to use your data and to ask for your consent. You are not required to give consent just because we ask for it. If you do give consent you can change your mind and withdraw it at a later date.

Please refer to the section on [how we use your personal data for marketing](#) to read about marketing consents.

Personal data you are legally obliged to provide:

You are not under a legal obligation to provide us with any of your personal data but please note that if you elect not to provide us with your personal data we may be unable to provide our goods or services to you.

Your rights to know what personal data we hold and to control how we use it:

You have a legal right to know what personal data we hold about you - this is called the right of subject access. You can exercise this right by sending us a written request at any time. Please mark your letter “**Subject Access Request**” and send it to us by post or email using the details in the [who we are and how you can contact us](#) section for the attention of our data protection officer (see the section on [our data protection officer](#) for contact details).

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You also have rights to:

- Prevent your personal data being used for marketing purposes (see [How we use your personal data for marketing](#) for further details).
- Have inaccurate personal data corrected, blocked or erased.
- Object to decisions being made about you by automated means.
- Object to our using your personal data in ways that are likely to cause you damage or distress.

You can find full details of your personal data rights on the Information Commissioner's Office website at www.ico.org.uk.

Automated decision making and profiling:

We do not make use of automated decision making or profiling.

When we will share your personal data with others:

We may share your data with the following people in the day to day running our business:

- Any business partners, suppliers and sub-contractors we work with to provide you with goods or services that you have requested from us.
- Advertisers and advertising networks (see [How we use your personal data for marketing](#) for more information]
- Analytics and search engine providers that assist us in the improvement and optimisation of our site.
- Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

We may also share your personal information with third parties on a one-off basis, for example, if:

- We sell or buy any business or assets (including our own), in which case we will disclose your personal data to the prospective seller or buyer of such business or assets
- We are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our [website terms of use](#) or our [terms and conditions of supply](#) and other agreements; or to protect the rights, property, or safety of our customers, ourselves or others. This includes exchanging

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information with other companies and organisations for the purposes of fraud protection and credit risk reduction

How we keep your personal data safe:

We take every care to ensure that your personal data is kept secure. The security measures we take include:

- Only storing your personal data on our secure servers.
- Encrypting any payment transactions made through our website or described alternative payment method (e.g. PayPal)
- Ensuring that our staff receives regular data security awareness training.
- Keeping paper records to a minimum and ensuring that those we do have are stored in a secure location within our office premises.
- Maintaining up to date firewalls and anti-virus software to minimise the risk of unauthorised access to our systems.
- Other security measures as may be pertinent at any given time.

Unfortunately, sending 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 personal data sent to our website; you send us personal data at your own risk. Once we have received your personal data, we will use strict procedures and security features (some of which are described above) to try to prevent unauthorised access.

How we use your personal data for marketing:

We will add your details to our marketing database if:

- You make an enquiry about our goods or services.
- You buy our goods or services.
- You have told a third party that you would like them to pass us your contact details so that we can send you updates about our goods and services.
- You have registered an account on our website and have indicated during the sign up process that you are happy to receive marketing communications

We may send you marketing communications by email, telephone or post.

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You can ask us to only send you marketing communications by particular methods (for example, you may be happy to receive emails from us but not telephone calls), about specific subjects (for example - insulation materials) or you may ask us not to send you any marketing communications at all.

We may ask you to indicate your marketing preferences when you first register an account on our website. You can check and update your current marketing preferences at any time by calling or emailing us using the details set out in the [Who we are and how you can contact us](#) section above.

We will never share your personal data with third parties for marketing purposes.

When we will send your personal data to other countries:

We will not export data to third parties in other countries.

How long we keep your personal data.

We will keep your personal data on file until you instruct us otherwise, which in practice this means that we will keep:

- Your details e.g. your name and contact details – cross ref to marketing as required.
- A record of the goods and services including a copy of your full customer file we provide to you for a minimum of seven years in compliance with HMRC regulations.
- Complaint records for two years.
- Please note that we may anonymise your personal data or use it for statistical purposes. We keep anonymised and statistical data indefinitely but we take care to ensure that such data can no longer identify or be connected to any individual.

How you can make a complaint:

If you are unhappy with the way we have used your personal data please contact our data protection officer to discuss this using the contact details set out in the how to contact us section above.

You are also entitled to make a complaint to the Information Commissioner's Office which you can do by visiting www.ico.org.uk. Whilst you are not required to do so, we encourage you to contact us directly to discuss any concerns that you may have and to allow us an opportunity to address these before you contact the Information Commissioner's Office.

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How we keep this policy up to date:

We will review and update this policy from time to time. This may be to reflect a change in the goods or services we offer or to our internal procedures or it may be to reflect a change in the law.

The easiest way to check for updates is by looking for the latest version of this policy on our website www.groundbreaker.co.uk or you can contact us please see [Who we are and how to contact us](#)) to ask us to send you the latest version of our policy.

Each time we update our policy we will update the policy version number shown in the footer of the policy and the date on which that version of the policy came into force.

This is policy version 2018 which is effective from 1st January 2018.