

Green Facilities Management Limited Privacy Policy

This Privacy Policy details how Green Facilities Management Limited with company number 07262423 of 114 Wheatlands, Heston, Middlesex, England, TW5 0SD ('Green Facilities', 'we', 'us', 'our', and 'ours') processes any personal data it holds about any of its data subjects ('you', and 'your').

Green Facilities is registered as a data controller with the ICO, with registration number: ZA343399.

Manu Sareen has overall responsibility for data protection matters at Green Facilities and can be contacted on 0800 044 5795 or info@greenfacilities.co.uk to assist with any queries in relation to this Privacy Policy.

Green Facilities is a cleaning company and provides a variety of cleaning and specialist cleaning solutions which includes (but is not limited to) offices, restaurant and pubs, retail, health clubs, schools and similar organisations, collectively known throughout this policy as 'cleaning services'. Therefore, Green Facilities provides its services to business to business customers. Simply put, we identify our client's cleaning requirements, and match suitably skilled cleaners to provide cleaning services to those clients. In addition to this, Green Facilities also acts as an employer for its own internal operations and staff. Therefore in the day-to-day running of our business, inevitably we need to process personal data of all related individuals, whether they operate through a company or not.

Green Facilities always endeavours to uphold the highest standards when processing your personal data. All of our staff are tuned into protecting and respecting your information. We will only process your personal data in accordance with this Privacy Policy. Should we process your data for any other reason, we will let you know. In the event you do not want us to process your personal data, then please do not provide us with such information, and let us know that you do not want us to process your personal data.

When communicating with Green Facilities, we are likely to gather and record information about you so we can tailor our service and provide our cleaning services effectively. Therefore, this Privacy Policy guides you through what personal data we may collect, or that you provide to us, that is processed by us and how you can get in touch should you have any concerns or questions.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

INFORMATION WE MAY COLLECT FROM YOU

If you are one of our clients or suppliers, or a third party who helps us to provide our business services we may collect and process (where applicable) the following data about you:

- your full name, job title, contact telephone number and email or other contact details such as website or Skype address
- details about the business relationship between you and us
- details of any calls, correspondence or meetings between you and us, including any business transactions
- any references, opinions or statements you may provide about our cleaning services
- any marketing preferences you may have provided to us

WHAT WE DO WITH YOUR DATA

If you are one of our clients or suppliers, or someone who helps us to provide our business services, we will process your data (where applicable) in the following way:

- we may collect and store (electronically or manually) your personal data. This may include any correspondence, telephone calls or meetings we have with you as a way of record keeping
- we will use your personal details to communicate with you
- sending relevant information about cleaning services we may have identified with you to our suppliers with whom we have or intend to enter into arrangements so we can provide cleaning services to you
- to record any business transactions between us including all relevant administration, i.e. issuing of contracts to meet our obligations that arise from contracts entered between you and us.
- for approval of services, i.e. processing payments
- providing information to the regulatory authorities (such as HMRC) or statutory bodies
- providing details (as necessary) to our legal or other professional advisers including our insurers
- for quality, training and the purpose of best practice
- to market our services to you
- information you voluntarily provide if you take part in any of our competitions and surveys which are used for research or promotional purposes.
- non-personally identifiable details of your website usage data and computer when you visit our website. Further explanation of this can be found in the usage data and cookies section
- back up information on our computer systems
- to supply you with articles, insight, news, relevant information, and products or services we feel may be of interest to you
- to provide interactive features of our service that you choose to take part in to notify you about important changes to our service.

WHERE WE ARE LIKELY TO OBTAIN YOUR DATA FROM

If you are one of our clients or suppliers, or someone who helps us to provide our cleaning services:

- other employees or contacts within your organisation
- marketing databases
- social media e.g. LinkedIn
- information in the public domain
- conversations on the telephone or video conferencing (e.g. Skype which may be recorded)
- in person, e.g. any notes following a conversation or meeting with you.

OUR LAWFUL BASIS FOR PROCESSING YOUR PERSONAL DATA – where you are one of our clients or suppliers, or a third party who helps us to provide our business services

Compliance with legal obligations (regulatory and statutory obligations)

In the provision of our cleaning services, we are obliged to comply with our statutory obligations which may include:

- Data protection laws for keeping your data safe
- Tax obligations and reporting requirements to HMRC
- Anti-fraud or bribery laws for fraud/crime prevention

We are committed to co-operating with regulatory authorities such as HMRC or the Information Commissioner’s Office, and will process data in order to meet such legal obligations.

Our legitimate interests (carrying on the business activity of providing cleaning services):

When we provide our services, we will process personal data where it is necessary for the purpose of our legitimate interests including:

- Using your personal data:
 - to contact you regarding our cleaning services
 - to evaluate the suitability of cleaners we may need to provide you with after we have taken notes during a call or meeting in relation to your cleaning requirements
 - collect information to identify market trends or analysis
 - as otherwise necessary to provide our cleaning services to the organisation whom you represent
 - personalise your experience and our offering, whether via our website or otherwise
- holding records of our business transactions and any relevant communication between us, for example we will use such records (as applicable) for:

- ensuring we are meeting our contractual obligations with clients or suppliers
- dealing with queries or disputes, and where necessary proving a transaction or defending a legal claim as necessary protecting our reputation
- maintaining backups of our systems where required (i.e. a security breach) so that we can restore them up to a certain point where required.
- monitoring quality and compliance including compliance with this Privacy Policy
- staff awareness and training.

For the purpose of these legitimate interests and our commercial feasibility, we may continue to process your personal data for as long as we consider necessary for these purposes.

Processing where you have given consent for a specific purpose for use of your data

In the event you provide your consent for a specific purpose, we will process your data based on such consent. An example of this may be where you have provided your contact details in order that we may use these to provide you with further information in relation to our cleaning services, you may have consented to our processing of your data for that specific purpose.

Where you have provided your details via our website through one of our forms, you will be asked for your consent whether you wish to receive the following updates from Green Facilities. The consent notice will appear in the following format:

Green Facilities is committed to protecting and respecting your privacy, and we'll only use your personal information to administer your account and to provide the products and services you requested from us. From time to time, we would like to contact you about our products and services, as well as other content that may be of interest to you. If you consent to us contacting you for this purpose, please tick the appropriate boxes below to say how you would like us to contact you:

- Eco-Friendly Office Cleaning Updates*
- Receive timely updates with the latest blog posts.*
- Eco-Friendly Commercial Cleaning Updates*
- Gym and Health Club Cleaning Updates*
- Retail Cleaning - Useful Tips & Updates*

In order to provide you the content requested, we need to store and process your personal data. If you consent to us storing your personal data for this purpose, please tick the checkbox below.

- I agree to allow greenfacilities.co.uk to store and process my personal data.*

Green Facilities needs the contact information you provide to us to contact you about our products and services. You may unsubscribe from these communications at anytime. For information on how to unsubscribe, as well as our privacy practices and commitment to protecting your privacy, check out our Privacy Policy.

So looking at the consent notice, you will need to select the appropriate checkboxes where you are happy to receive such updates, and then the checkbox that provides your permission to store and process personal data for the reasons selected.

You have the right to withdraw your consent to our processing of your personal data for a particular purpose at any time by simply letting us know. Where you withdraw such specific consent, this will not have a bearing on the lawfulness of processing such data prior to the withdrawal.

It is important to note while such specific consent may be withdrawn, we may be required to continue to process data where we have a legal obligation to do so, or where we are contractually obliged to do so, or where we have a legitimate interest to do so. We will limit the processing of your data as required to meet such legal or contractual obligations or legitimate interests.

What if we obtain your personal data from a third party?

Given the nature of our business we may need to carry out research about individuals where trying to identify clients with cleaning requirements, or suppliers who may be able to assist us with providing our cleaning services. We will therefore obtain personal data about individuals on advertisements, LinkedIn or social media where some information will be publicly available. We may also obtain information from sites or providers to which we subscribe. Other sources may be from clients, the entity requiring cleaning services, colleagues, former colleagues and employers, or from someone who you have previously been engaged with for the provision of cleaning services.

Where we receive information from such third party sources we shall only retain such information if it is relevant. Where you have let us know that you do not wish for us to provide you with services or process your data, we shall simply discard the information.

Please note we may need to maintain a record with limited details to ensure we do not duplicate process and attempt to process your data. Any data that we hold for the furtherance of our cleaning services will only be held in accordance with this Privacy Policy. We will only process your data in accordance with this Privacy Policy, and if you wish to exercise your rights for us to not process your data, simply let us know.

Sensitive Personal Data

Sensitive personal data is information which is intensely personal to you and is usually irrelevant to our dealings with you in respect of our cleaning services. Examples of sensitive personal data include information which reveals your political, religious or philosophical beliefs, sexual orientation, race or ethnic origin, or information relating to your health.

Regardless of the basis for your dealings with us, we request that you do not provide us with any sensitive personal data unless absolutely necessary. However, to the extent that you do provide us with any sensitive personal data, such as data which you choose to share with us in conversation, we shall only use that personal data for the purposes of our relationship with you or for the provision of our cleaning services. This will be for one or more of the following reasons:

- you have explicitly consented to the processing
- where processing is necessary for the purpose of obligations or rights under law
- to maintain records of our dealings to address any later dispute, including but not limited to the establishment, exercise or defence of any legal claims

In the event you provide sensitive personal data which is information that is very personal to you, in most circumstances it is not relevant to our consideration when assessing your cleaning requirements. Examples may include information relating to your health, race or ethnic origin, sexual orientation, or you may provide information about your political or religious beliefs.

Our recommendation is that you only provide us with sensitive personal data where it is absolutely necessary.

However, where you do provide us with sensitive personal data, for example on a call or in a meeting, we shall only use that data for the purposes of our relationship with you or for the provision of our cleaning services, and will be for one or more of the following reasons:

- where we need to processing data which is necessary for the purpose of obligations or rights under law
- where you have provided your explicit consent to our processing of such data
- so we have a records of any business transactions as well as our dealings to address any disputes, including but not limited to the defence of any legal claims

Who we share personal data with

Unless we are entitled to do so, we shall not share your personal information. We may share your personal information with the following categories of persons:

- individuals or third party suppliers where it is necessary for the provision of our cleaning services

- any regulatory authority or statutory body such as HMRC or the Information Commissioner's Office where we are required to do so
- parties who process data on our behalf including (but not limited to) our IT and cloud or storage providers, outsourced cleaning service, or companies who help facilitate payments
- insurers and legal and professional advisers

YOUR DATA PROCESSING RIGHTS (THIS APPLIES TO ALL DATA SUBJECTS INCLUDING OUR CLIENTS & SUPPLIERS)

Where we process data, we understand that you have certain rights listed as follows:

1. The right to be informed;
2. The right of access;
3. The right to rectification;
4. The right to erasure;
5. The right to restrict processing;
6. The right to data portability;
7. The right to object;
8. Rights in relation to automated decision making and profiling.

Right to be informed

Where you provide your personal data directly to us, we will communicate our Privacy Notice to you at the earliest opportunity or as soon as is reasonably practicable. We will usually do this at the first point we correspond with each other. Our usual format for this is via email where you will find a link to this to this Privacy Policy which can also be found on our website.

Right of access

If you wish to receive a copy of personally identifiable data we store about you this can be made available on request. To do this please email info@greenfacilities.co.uk and title your email '**Data Subject Access Request**', including your name and contact details and your reason for requesting a copy of the data we store about you. To ensure we are sending your personal data to you, we may need to contact you to verify your identity. Once we have verified your identity, we will supply you with a digital record of all your personal data as soon as we can, but in any event it will be within thirty days.

We will not charge you for supplying copies of your personal data in the first instance. However, in the event we find data subject access requests to be manifestly unfounded or excessive, particularly where repetitive, we will need to consider the effort required to handle such requests and charge a reasonable administrative fee.

Right to rectification

Where you feel the personal data we hold about you is inaccurate or incomplete, you have the right to advise us and we will rectify such data in accordance with your instructions. Please email info@greenfacilities.co.uk and title your email '**Data Rectification Request**'. We will endeavour to action your request within 48 hours or as soon as is reasonably practicable thereafter.

Right to erasure

If you no longer want us to process your personal data, we can remove your personally identifiable data from our databases on request. To do this please email info@greenfacilities.co.uk and title your email '**Data Erasure Request**', including your name, telephone number and the reason why you no longer want us to process your data. We may need to contact you to verify your identity. To ensure we are sending your personal data to you, we may need to contact you to verify your identity. Once we have verified your identity, we will aim to erase all related personal identifiable data as soon as we can. We will aim to action your request within two working days, though we will contact you to let you know once completed.

Please note we will need to store some basic information including your full name and basic contact details which may include your email address or your telephone number. This is in order to ensure we do not duplicate process and we have a sufficient record to ensure we do not unnecessarily contact you or further process your personal data. Should you change your mind or require our services at a later date, simply let us know.

Right to restrict processing

If at any point you object to us using your data in a particular way you have the right to suppress or block us processing your data.

For example, if you do not want us to use your data for marketing purposes simply let us know, or use the registration form you submit to us by ensuring you only select those services or updates you agree for us to send to you. Please note we will not check any of the boxes on your behalf unless you specifically ask us to do so. Please ensure you provide your express permission and check the relevant boxes manually if you wish to sign up to our marketing lists. If you wish to change your email marketing preference once you have signed up, you can simply unsubscribe where you will have the option to do so in related emails, or if you contact us, we can do this for you.

You can exercise this right at any time, please email info@greenfacilities.co.uk and title your email '**Data Restriction Request**', including your name and contact details, the reason for your request and how you want us to restrict the processing of your data. We will attempt to action your request within 48 hours or as soon as is reasonably practicable thereafter.

Right to data portability

Where you have provided your data directly to us and it is processed by automated means, you have the right to receive personal data back from us in a structured machine readable format and where you request (and if possible) we will transmit your personal data to another data controller. We will always try to facilitate such request where it is technically feasible to do so.

Please note this right is only applicable where the processing is based on the individual's consent or for the performance of a contract.

Should you wish to exercise this right at any time, please email info@greenfacilities.co.uk and title your email '**Data Portability Request**', including your name and contact details, and the reason for your request. Where possible, we will attempt to action your request as soon as is reasonably practicable to do so.

The right to object;

In the event you object to our processing of your data where we have identified that such processing is based upon legitimate interest and you believe there are no grounds for us to continue to process your data, then you have the right to object.

Should you wish to exercise this right at any time, please email info@greenfacilities.co.uk and title your email '**Data Objection Request**', including your name and contact details, and the reason for your request. We will attempt to action your request as soon as is reasonably practicable to do so.

Rights in relation to automated decision making and profiling.

In the event we use automated decision making software, and if you disagree with any decision which affects you, you have the right to object.

Should you wish to exercise this right at any time, please email info@greenfacilities.co.uk and title your email '**Automated Decision Clarification Request**', including your name and contact details, and the reason for your request. We will attempt to action your request as soon as is reasonably practicable to do so.

Additional comments in relation to your rights

While we understand your rights as detailed above and will assist you with them wherever possible, please note that we may continue to retain, or otherwise use your personal data where we have a legitimate interest or a legal or contractual obligation to do so. Our processing in that respect will be limited to what is necessary in furtherance of those interests or obligations.

We may also need to retain a record where we help you with any of the rights detailed above to keep a record of the request along with the action taken, so that we can evidence our compliance, as well as to ensure that where we receive your data in the future, i.e. a third

party source, we will know that we should not process your data. Should you wish to change your mind at any point, simply contact us and we will be happy to help.

Complaints

In the event you wish to make a complaint about the way your data is processed by us, we request that you contact us on 0800 044 5795 or email info@greenfacilities.co.uk and we will try to help resolve your query.

If you feel the matter has not been handled to your satisfaction you may escalate your complaint to Manu Sareen who has overall responsibility for data protection matters at Green Facilities.

You do of course have the option to raise the matter with the Information Commissioner's Office at any point where you feel we have not acted in accordance with this Privacy Policy.

WHERE AND HOW WE STORE YOUR PERSONAL DATA

Any personal data that we collect from you will be transferred to, and stored by, a third-party database system with whom we have contractual arrangements with. By submitting your personal data, you agree to this transfer, storing and processing of your data. We endeavour to take all reasonable steps necessary to ensure that your data is handled securely and in accordance with this Privacy Policy. Should you not wish us to process your data, then simply let us know.

KEEPING YOUR PERSONAL DATA SECURE

We take the safety and protection of your personal data very seriously and take all reasonable steps to ensure your data is protected. However, the transmission of information via the internet is never completely secure and therefore we cannot give an absolute guarantee as to the safety of data transmitted to our site or any third party. While any transmission of data is taken at your own risk, we work with our IT and storage providers to ensure they can provide ongoing confidentiality, integrity, availability and resilience of processing systems and services, to make breaches far less likely.

Your data will only be accessed by our staff and third parties where authorised to do so. This will be in circumstances where access is required in order for us to effectively provide our cleaning services.

We will work with our IT and storage providers and own internal staff to ensure appropriate organisational and technical measures are taken against any unauthorised or illegal processing of your personal data, including the accidental loss of or damage to it.

We have worked to ensure we have the technology, procedures and appropriate training of relevant individuals to keep your personal data secure and safe from when we collect it, until it is no longer processed or required, or removed at your request.

Where we share your personal data with a third party we will only make transfers where they too have appropriate technical and organisational measures to keep your personal data secure.

USAGE DATA AND COOKIES

When visiting websites, a cookie is a small file made up of letters and numbers that is downloaded onto your computer. Accordingly, we may collect information about your computer, including (where available) your IP address, geographical location, operating system and browser type. This will be for the purpose of system administration and the internal reporting of aggregate information. We may also collect and store usage data including referral source, length of visit, page views, website navigation paths, as well as information about the timing, frequency and pattern of service use. Our usage data is monitored and handled by Google Analytics where the data may be processed for the purposes of analysing the use of our website and services. We use such usage data and to make improvements to our website and services. This is statistical data about our users' browsing actions and patterns and does not identify any individual actions in particular.

DATA REMOVAL

If we believe your data is no longer of use to us, for example if we feel your requirements are not appropriate to the cleaning services we offer, or where we reasonably feel your data is out of date we will take steps to remove or update your information to ensure it is relevant and accurate in our third-party database.

You may request we remove or update your information as necessary.

We do not hold personal data for longer than we are required to do so. Generally we hold information for 6 years from the last point of engagement. Where we are contractually obliged to do so, where we are required by law, or for example where your personal data highlights a specialist or niche cleaning skillset as one of our suppliers which is likely lead to an engagement or opportunity with one of our clients, we may hold information for longer.

WHERE YOU DO NOT WISH TO SHARE YOUR PERSONAL DATA WITH US

In order for us to meet our legal or contractual obligations, there may be occasions where we request personal data from you in order to provide our cleaning services

In the event you do not wish to provide us with such personal data, please let us know. In such circumstances it may mean that we are unable to continue to provide you with our cleaning services as the non-provision of such data may mean we are unable to confirm specific details in order for us to provide our cleaning services.

TRANSFERRING DATA OUTSIDE OF THE EEA

While our business is predominantly based in the UK, we may need to transfer your personal data outside of the EEA should one of our clients or suppliers require it to do so, as we may be contractually obliged to do so in such circumstances. Where such information is to be transferred we will do so where there is an adequacy decision from the EU commission, or where there is appropriate data protection legislation in place (e.g. US Privacy Shield). Where there is no such adequacy decision we will take appropriate steps as far as is reasonably practicable to understand how the data will be processed, and where we identify any risks, we will try to ensure your data is protected in line with any applicable data protection legislation.

DISCLOSURE OF YOUR DATA TO THIRD PARTIES

We will never rent or sell your data. We will only share data we collect from you to third parties where:

- you have specifically consented to us sharing your data with third-parties.
- you are using our cleaning services where the data will only be shared for the purpose of evaluating a cleaner's suitability to the cleaning requirement
- it is needed to provide a product or service you have requested from us
- we need to protect the rights, property, or safety of Green Facilities, our employees, clients, suppliers or others, including the exchange of information with other organisations for the purposes of fraud protection and credit risk reduction.
- we have a legitimate interest or a legal or contractual obligation to do so.

THIRD PARTY WEBSITES

Our website (or emails we send) may contain links to and from websites of organisations we deal with including clients, suppliers, partner networks, advertisers and associated affiliates. Please note when using links to such third party websites, they will have their own privacy and cookie policies which you should familiarise yourself with. Green Facilities does not take any responsibility or accept liability for such third party privacy and cookie policies. Please ensure you are happy with such third party privacy policies before submitting your personal data to these third-party websites.

CHANGES TO THIS POLICY

We may need to modify and update the terms of this Privacy Policy to comply with changes to the law or to match our product and service offerings. If a substantial or material change is made to this Privacy Policy and the way in which we intend to use your personal data, we will inform you by email.