

GDPR, Privacy & Personal Data Security

VERSION	2.3
DATE	27 th April 2018
SPONSOR	Data Protection Officer
APPROVED BY	Chief Executive Officer

Introduction

David Phillips is the leading specialist furniture services provider in the UK. We work across the property sector from residential housing through to retirement living developments and student accommodation. We work with many Private, Public, and Third Sector organisations and individuals including investors, landlords and private customers; property managers and agents; residents and tenants; porters and building managers; developers, construction companies, build-to-rent investors and other property providers as well as all our suppliers, employees and others who facilitate our services.

Providing our furnishing services involves entering private properties. That requires trust. We take that duty very seriously. Trust is fundamental to everything that we do, and one aspect of that trust is the security and privacy of all personal data.

This statement gives an overview of our commitment to you and shows how we fulfil our responsibilities under the relevant legislation including the UK's Data Protection Act (DPA) and the EU's General Data Protection Regulation (GDPR).

Personal Data Held

- Our overriding principle is that we treat all personal data as confidential.
- We comply with all relevant legislation including the DPA & GDPR. Our Data Protection Officer is responsible for implementing policies to ensure legal compliance and to ensure that we maintain the high standards of confidentiality, privacy and security necessary to maintain the trust of our customers and all others with whom we work.
- We are registered with the Information Commissioner's Office (ICO) as a Data Processor: No. ZA245481.
- The great majority of personal data we gather is required to fulfil our services. For customers and potential customers, we gather the data relevant to processing their orders and managing accounts such as name, address, email, phone numbers and website. This data is provided by our customers, suppliers and other affiliates related to providing the services.
- Reflecting the diverse nature of our customer base and the other contacts with whom we work, we hold 'company contact' information relating to the legal/billing entity with whom we trade. We also hold 'person contact' data relating to individuals within the organisation with whom we interact. (NB where we trade with a private individual, the company contact data may be the same as for the person contact.)
- We typically obtain data directly from our customers and contacts by phone, email or in person. We also obtain data from websites, enquiries, responses to marketing campaigns and publicly available sources. Third parties provide personal data such as where we are engaged by an agent on behalf of their client; in this case we check that consent has been provided by the subject to share the data.
- We do not hold data on children.
- Personal data and consent information is held primarily on our Microsoft Dynamics CRM/ERP system. It is also held within our GDPR-compliant Microsoft Office 365 and Azure system and subject to our policies and safeguards. David Phillips and our third-party system providers offer very high levels of enterprise-grade system security. The providers are contractually required to manage all data in accordance with demanding confidentiality agreements.

Use of Personal Data

- We use personal data to provide our services effectively and efficiently. This includes sending quotes, orders, invoices & statements, usually by email and resolving any queries. We will contact the relevant person using the most appropriate means in the circumstances. We may take photographs of installations to demonstrate fulfilment or show any issues identified. We use the data for processing payments and conducting credit checks where applicable.
- We use anonymised data for general analysis purposes. Any analysis containing any personal data is treated as confidential and subject to our privacy policies.
- We do not provide personal data to any third parties except where necessary to fulfil orders. Any subcontractors with whom we may share personal data have contractual obligations to meet our safeguarding requirements. We may also share personal data with relevant authorities where required by law but only to the extent required.
- Personal data unrelated to the customer that is shared with us purely to fulfil orders, such as access contact information, is treated confidentially. We will not use this for any other purpose.
- Before sharing any personal data in the instances above, we will ensure that the other party is compliant with the regulations and our policies. Personal data is provided only where it is needed and on the basis that no consent is given to hold the data beyond the transaction in question or to use it for any other purpose.
- Where the required consent has been given, David Phillips Group companies may use your data for basic sales or marketing. We do not share any personal data with any third parties for marketing except outsourced marketing on our behalf and subject to our controls.

Your Consent

- We will not hold any personal data on you without your consent. If you withdraw your consent to hold a particular item of personal data, it will be amended or deleted as requested. If you request to remove all personal data, all records will be deleted at the next routine cleansing.
- We hope that you will consent to allow us to use your data occasionally for selected marketing purposes that are relevant to you. If so, we will ask you to specify the communication means you consent to receive. (As mentioned, any such communication will come only from us.)
- If you are unwilling to receive any marketing information from us at all, you may still allow us to hold the data purely for transactional purposes. In this case, we will communicate with you only in relation to orders or enquiries you place and related accounting matters.

Your Rights

Subject to any legal requirements, you have the following rights:

- To be informed whether we hold any personal information about you;
- To be informed of the personal information we hold;
- To correct your data or change your consent to what personal data is held or how it is used.

Amending & Updating Your Personal Data

- We are obliged to keep personal data accurate and current. We wish to do this in any event to ensure that any correspondence is effective and to help us provide our services efficiently.
- Please notify us of any change to your personal data or consent to either your 'person contact' information or any related 'company contact' data that you are authorised to amend.
- To amend any data or consent, please send an email to GDPR@davidphillips.com specifying the change required. This enables us to confirm your identity.
- If you do not have access to email, please write to us at Customer Service Team, Units 96 – 100, London Industry Park, Roding Road, London, E6 6LS or call 020 3872 2295. We will then contact you to verify your identity before making any change.

Questions

- If you have any questions regarding your data or our policies relating to privacy and personal data security, please contact us using the methods above. We will respond within 7 days.
- If we have any questions regarding your status or requests, we will contact you to clarify them.