

Privacy Notice

At CEIBA Renewables Limited, we specialise in providing renewable energy services to both domestic and commercial customers. As part of delivering our services we collect and process personal information known as 'Personal Data' and we always take your data privacy seriously.

When we collect personal data, we are a 'Data Controller' and we are responsible for and committed to protecting your privacy and complying with the UK General Data Protection Regulations (UK GDPR), Data Protection Act 2018, the EU General Data Protection Regulations where applicable and any subsequent laws or regulations applicable.

In this Privacy Notice, we want to let you know about what information we collect, how we use it and what rights you in relation to the collection and processing of their personal data.

Our Contact Details

CEIBA Renewables Limited
Unit 1 Wellfield Court, Ibrox Business Park
46 Broomloan Place
Glasgow
Scotland
G51 2JR

Email: support@ceiba-renewables.co.uk

Tel: 0800 009 6285

If you have any questions in respect of this Privacy Notice or how we manage your personal data, please contact us using the contact details above.

Whose Information Do We Collect?

Ther personal data we collect can belong to our customers, enquirers, suppliers, subcontractors or sometimes individuals nominated by our suppliers or customers as a point of contact for delivery or installation.

What Personal Data Do We Collect And Process?

We collect the following types of data:

- General contact details such as, name, address, email address, telephone number.
- Contact details of nominated contacts at site locations or residences.
- Details of services and products provided to you or your customers.
- General communications between you and us.
- Financial details payment details, credit card numbers, bank details or account information.
- For recruitment and contracting work and education history and any other information voluntarily submitted within CV content.
- Information obtained through our use of cookies (please see our Cookie Policy)
- Your marketing preferences.
- For contractors or suppliers we may also collect the following;
 - Qualifications / Authorisations
 - o Identification documents such as photocard, driving licence
 - o Site attendance and work hours.
 - o References.

Special Categories Of Personal Data That We Collect

We do not collect, process or store and Special Category data in the provision of our services. However, in some cases, you may voluntarily share additional information during discussion with us. Where this is the case, we collect this only with your consent and retain it only for as long as strictly necessary (often we delete this immediately where it is not needed).

How We Collect Your Information

In most cases we collect your data directly from you. We collect data and process it when you:

- Complete an online "book an appointment" form.
- Speak to us on the telephone to discuss our products or services.
- Email or write to us about our products or services.
- In relation to potential employment with us:
 - o Send us a CV
 - o Complete an application form
 - Attend an interview

We also receive your data indirectly from the following sources:

- Public sources demographic data, Market Research
- Publicly available company data sources such as Companies House.
- Referral from a personal or business contact.
- Commercial clients such as builders or architects.
- Social Media Sites.
- People who have your permission to provide information on your behalf (for example where you have been asked to attend a site or speak with us by our customer.
- View our website via your browsers cookies (see our <u>Cookie Policy</u>)

Please Remember: Where you provide any of this information relating to or on behalf of another individual such as a nominated contact, you must remember to ensure that you have the **consent** of the individual and provide them with a copy of or access to this Privacy Notice.

Why Do We Collect Your Information?

Where we collect and process personal data, its important that we identify both the purpose and legal basis for doing so. There are 6 possible legal bases that all firms who process your data need to consider. These are:

Consent – where we have consent from the individual to the processing of his or her personal data for one or more specific purpose.

Contract – where the processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

Legal Obligation – The processing is necessary for compliance with a legal obligation to which we are subject.

Vital Interests – Where the processing is necessary in order to protect the vital interests of the data subject or another natural person.

Public Interest – Where the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Legitimate Interests - Where the processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

Our purpose and legal basis for the information that we collect, and process allows us to:

Our Purpose For Processing	Our Lawful Basis
To understand your requirements prior to entering into a contract of sale or service with you	The processing is necessary for the performance of an anticipated Contract of sale or service
To understand all requirements to ensure that any information submitted as part of our contract of sale or service is accurate	The processing is necessary for the performance of a Contract of sale or service
To fulfil our contractual obligations with you	The processing is necessary for the performance of our Contract
To manage our business operations and comply with any internal policies and procedures	It is in our Legitimate Interests to use your personal information to ensure that we provide and adapt our products or range
To control access to sites and premises and ensure the security of the buildings, property and safety of our contractors and employees	It is in our Legitimate Interests to protect the security of sites and premises and the safety of our contractors and employees
To prevent, detect and investigate a theft of materials, equipment or assets owned by the company, contractors or employees or threats to the safety of such individuals.	It is in our Legitimate Interests to prevent, detect and investigate theft of property belonging to our business, our employees or our contractors
To notify you about changes to our service or new or similar products	It is in our Legitimate Interests to use your personal information to keep you informed about any changes that may affect you
For Electronic Marketing of similar products or services to existing or previous clients or enquirers	It is in our Legitimate Interests to use your personal information for marketing purposes where the products being marketed are similar and relevant to you.
For Electronic Marketing of products or services to potential new individual customers	We rely on Consent for direct marketing to previously unknown individuals
To comply with our legal obligations, law enforcement, court and regulatory bodies requirements	To comply with our Legal Obligations
To identify and prevent fraud	It is in our Legitimate Interests to act as a responsible business
To decide whether to enter into a contract of employment	The processing is necessary when considering an employment Contract
To carry out background and reference checks in relation to recruitment	The processing is necessary when considering an employment Contract
To communicate with you about a potential contract (for service or employment)	The processing is necessary for the performance and compliance with any Contract of employment

Where we rely on your consent you have the right to **withdraw this consent** at any time by contacting us using the details at the beginning of this notice.

Legitimate Interests - Where the processing of personal data is based on our Legitimate Interests, it is to improve on our service, security and prevent fraud or illegal activity in favour of the wellbeing of our customers, employees and shareholders.

Direct Marketing

We may send you details of similar services to those you have enquired about or purchased from us previously. You can opt out of receiving this information from us at any time by contacting us at the above address or clicking 'unsubscribe' on any messages you may receive.

We will never share or sell your information to any other party for marketing purposes.

Who Do We Share Your Information With?

From time to time, we may need to share your personal information with the following third parties. We do this only in relation to the purposes set out above:

- Our Accountant or Payment Service Providers.
- Associates and Contractors who deliver services on our behalf such as roofers or other tradesmen.
- Software, App and Cloud storage providers to manage our business records and services.
- Police and Law Enforcement agencies where we are requested to do so and it is reasonably necessary for the prevention or detection of crime.
- Regulators and governing bodies such as HMRC where required.
- Selected Third Parties in connection with any future sale, transfer, or disposal of our business.

International Data Transfers

With today's modern technology for example when we use Cloud Storage and Software, some recipients of your personal data can be located outside your country or have offices in countries where data protection laws may provide a different level of protection than the laws in your country.

Where this is the case, we make sure that additional safeguards are in place such as ensuring that those countries have a decision of adequacy under the UK GDPR, have entered into contract clauses or in the case of the US, the recipients of personal data are certified under the EU-US Data Privacy Framework and the UK extension to this.

Automated Decision-Making Or Profiling

We do not process personal data for automated decision making or profiling.

How Long Do We Keep Personal Data For?

We will retain personal data in accordance with legal and regulatory requirements and for no longer than is necessary to fulfil the purposes set out in this privacy policy. We

maintain and review a detailed retention policy which documents how long we will hold different types of data. The time period will depend on the purpose for which we collected the information and is never on an indefinite basis. Subsequently, we will delete your personal data in accordance with our data retention and deletion policy or take steps to properly render the data anonymous, unless we are legally obliged to keep your personal data longer (e.g. for tax, accounting or auditing purposes).

The following details briefly the criteria used to establish the retention period set out within our policy:

Where it is still necessary for the provision of our Services

This includes retaining some of the contract information for the duration of any contract for services we have with you and for a period of 25 Years after the end of any contract. This is with a view to maintaining and improving the performance of our products, keeping our systems secure, maintaining warranties and maintaining appropriate business and financial records. Most of our retention periods are determined on the basis of this general rule.

Where required by statutory, contractual or other similar obligations

Corresponding storage obligations may arise, for example, from laws or regulation. It may also be necessary to store personal data regarding pending or future legal disputes. Personal data contained in contracts, notifications and business letters may be subject to statutory storage obligations depending on national law. Where this is the case will retain the data in accordance with our obligations.

Your Rights As A Data Subject

As a data subject, you have rights in relation to your personal data. These are:

The Right to Access – You have the right to request details of personal information held or processed and to copies of this data. We do not usually charge for this service.

The Right to Rectification – You have the right to request that any information be corrected that you believe is inaccurate or to complete any information that you believe is incomplete.

The Right to Erasure – You have the right to request that we erase your personal information under certain conditions.

The Right to Restrict Processing – You have the right to request that we restrict the processing of your personal data under certain circumstances.

The Right to Object to Processing – You have the right to object to our processing of your data, under certain conditions.

The Right to Data Portability – You have the right to request that we transfer the data that we have collected to another organisation or directly to you, under certain conditions.

You also have the **Right to Withdraw Consent** where you have previously provided this at any time.

To exercise any of these rights, or if you have a complaint, please contact us using the contact details at the beginning of this notice.

You also have the right to complain to the Supervisory Authority. In the UK, where you wish to report a complaint or feel that we have not addressed your concern in a satisfactory manner, you may contact the Information Commissioner's Office at:

The Information Commissioner's Office – Scotland Queen Elizabeth House Sibbald Walk Edinburgh EH8 8FT

Telephone: 0303 123 1115 or via live chat

You can also click the link below to begin the compliant process online.

https://ico.org.uk/make-a-complaint/data-protection-complaints/data-protection-complaints/

Contractual Obligations and Consequences

In some circumstances, the provision of personal data is partly required by law (for example, tax regulations, employment and legal obligations) or can also result from contractual provisions. This means that it may sometimes be necessary to conclude or fulfil a contract, that the personal data be provided. In those circumstances where the data is not provided or where certain rights are exercised, (Erasure, Object) there is a possible consequence that the contract could not be fulfilled or concluded and may be cancelled.

The following details the criteria used to establish the retention period set out within our policy:

Where it is still necessary for the provision of our Services

We will retain all client files for 5 years after the end of our contract of service. This is with a view to maintaining and improving the performance of our products, keeping our systems secure, maintaining warranties and maintaining appropriate business and financial records. Most of our retention periods are determined on the basis of this general rule.

Where required by statutory, contractual or other similar obligations

We will retain some of the contract information for services we have with you and for a period of 25 Years after the end of any contract. This is to ensure that we can meet our contractual obligations. In addition, we may need to retain information according to laws or regulation or future legal disputes. Where this is the case will retain the data in accordance with our obligations.

Cookies & Similar Technologies

When you visit our Website, we use cookies and similar technologies to provide you with a better, faster and safer user experience or to show you personalised advertising. Cookies are small text files that are automatically created by your browser and stored on your device when you visit or use our Website. For full information on our use of cookies and how to manage them, please see our <u>Cookie Policy</u>.

To learn more about how to manage your browser cookie settings in general please see www.allaboutcookies.org

Please Remember: We want you to be safe when you are sharing your personal data and to understand what this means for you. Please remember, when clicking on external links via our website or when you find us via social media platforms, you are visiting or redirected to the domain of those websites.

We have no control over the privacy settings on these firms or their websites or the cookies they set, so please bear in mind that you should always review their privacy information and where required you should set your preferences in line with their own policies and cookie controls separately.

Data Security

We aim to protect your personal data through technical and organisational security measures to minimise risks associated with data loss, misuse, unauthorised access and unauthorised disclosure and alteration.

We store customer records in cloud-based services which have controlled and restricted access. We also operate internal policies and procedures detailing physical security, cloud storage security monitoring, access control and password security measures.

Changes To Our Privacy Notice

All businesses change from time to time. At CEIBA Renewables Limited we keep our Privacy Notice under regular review.

This Privacy Notice was last updated on 31st October 2024.

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