
FULL PRIVACY NOTICE

BACKGROUND:

Thermal Issues Limited understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all those who entrust their data to us and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1. Information About Us

Thermal Issues Limited.

Limited company registered in England under company number 20154280.

Registered address: Thermal Issues Limited, Unit M3, Harrison Road, Airfield Business Park, Market Harborough LE16 7UL.

VAT number: GB 198 8384 33.

Person responsible for Data Protection: Neil Wilson.

Email address: dataprotection@thermalissues.com.

Telephone number: +44 (0)1858 431 133.

Postal address: Thermal Issues Limited, Unit M3, Harrison Road, Airfield Business Park, Market Harborough LE16 7UL.

We are regulated by the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. Website: <https://ico.org.uk>

2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What Is Personal Data?

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

4. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to if you become aware of any inaccuracies or gaps in your personal data that we hold.
- d) The right to be forgotten, i.e., the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e., prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask for a copy of that personal data to re-use with another service or business in many cases.
- a) Rights relating to automated decision-making and profiling. Part 6 explains more about how we use your personal data, including profiling.
- b) For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

It is important that your personal data is kept accurate and up to date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 11.

5. **What Personal Data Do You Collect and How?**

We may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. We do not collect any 'special category' or 'sensitive' personal data or personal data relating to children or data relating to criminal convictions and/or offences.

Data Collected	How We Collect the Data
Contact information: name, email address and telephone number(s).	You will provide this information when you contact us via email and/or make a telephone enquiry and/or when we meet (at a trade show for example) and/or when you become a customer.
Company / business information: Company name, company addresses (e.g., trading, registered, postal), company registration number, and telephone number/s.	You will provide this information when you become a customer us.
Usage data including unique identifiers such as cookies, web beacons and IP addresses.	This is collected through automated means when you interact with our website.
Credit history / score / worthiness	Report obtained online via a service provider such as Equifax.
Payment information: bank details.	You will provide this information when you become a customer / place an order / open an account with us.
Profile information: Purchase history.	When you place an order with us, details of the order are retained within our Accounting and Customer Relationship Management (CRM) system.
Contact information and work history: name, email address, postal address, telephone number/s, previous employers, job titles and dates of employment.	You will provide this information when you apply for a job with Thermal Issues Limited. If you subsequently become an employee of Thermal Issues Limited, you will be required to provide further personal information. Details of the information we collect, how it's processed and for what purpose are included in our employee data protection policy, a copy of which will be provided to you.
Identity information / proof of accreditation / membership number.	You will provide this information when you are working on something for us, and if the type of work you're undertaking demands it.

6. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we may use your personal data, and our lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Bases
Administering our business.	Company / business information and financial	Legal Obligation.

	transactions.	
Supplying our products to you.	Contact and company / business information.	Contract.
Company credit checks.	Credit report.	Contract.
Managing payments for our services.	Payment information.	Contract.
Communicating with you.	Contact information.	Legitimate Interests.
Marketing our services to you.	Contact and business information.	Legitimate Interests.
Improving our services.	Usage data and unique identifiers.	Consent.
Tailoring our marketing / marketing relevant services to you.	Usage data and unique identifiers.	Consent.
Managing, supporting and safeguarding our employees and contractors.	Please refer to employee data protection policy.	Contract, Legal Obligation, Legitimate Interests.

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email or telephone. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. We will never share your personal data with third parties for marketing purposes.

We use the following automated systems for carrying out certain kinds of profiling. If at any point you wish to query any action that we take on the basis of this, the Data Protection Legislation gives you the right to do so. Please contact us to find out more using the details in Part 11.

- The following automated profiling may take place:
 - We use Google Tag Manager and Analytics which includes tracking cookies and a 'web beacon' (on our website, thermalissues.com) to measure the success of our website and associated Search Engine Optimisation (SEO) and Pay-Per-Click (PPC) campaigns. We do not do this without your consent which is requested via the 'cookie banner' (on our website).

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish to explain how the new purpose is compatible with the original, please contact us using the details in Part 11.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long We Keep It
Contact information: name, postal address, email address and telephone number(s). (sales enquiries / prospects)	For as long as there's the potential for us to work together, though we'll endeavour to verify this at least every 12 months.
Company / business information: Business name, job title. (sales enquiries / prospects)	For as long as there's the potential for us to work together, though we'll endeavour to verify this at least every 12 months.
Usage data and unique identifiers (via Google Tag Manager and Analytics)	A maximum of 2 years.
Contact information: name, postal address, email address and telephone number(s). (customers)	For as long as you're a customer + for as long as there's the potential for us to work together again, though we'll look to verify this every 12 months (12 months from date of project completion).
Company / business information: Business name, job title. (customers)	For as long as you're a customer + 6 years (6 years from date of project completion).
Credit history / score / worthiness. (customers)	For as long as you're a customer.
Profile information: Purchase history. (customers)	For as long as you're a customer + 6 years (6 years from date of project completion).
Contact information and work history: name, email address, postal address, telephone number/s, previous employers, job titles and dates of employment. (job applicants)	Details of unsuccessful candidates deleted / shredded within 12 months of application.
Identity information / proof of accreditation / membership number. (contractors / supplies)	12 months.

8. How and Where Do You Store or Transfer My Personal Data?

We will store some of your personal data in the UK. This means that it will be fully protected under the Data Protection Legislation.

We will store some of your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the EU GDPR and/or to equivalent standards by law. Transfers of personal data to the EEA from the UK are permitted without additional

safeguards.

We may store some or all of your personal data in countries outside of the UK. These are known as “third countries”. We will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation as follows:

We will use specific approved contracts which ensure the same levels of personal data protection that apply under the Data Protection Legislation. For further information, please refer to the [Information Commissioner’s Office](#).

Please contact us using the details below in Part 11 for further information about the particular data protection safeguards used by us when transferring your personal data to a third country.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner’s Office where we are legally required to do so;
- the implementation and maintenance of appropriate technology solutions such as firewall/s, anti-virus software, and encryption.

9. Do You Share My Personal Data and/or Use Other Organisations to Process My Personal Data?

We may sometimes contract with the following third parties to help us run our business and supply our services.

Recipient	Activity Carried Out / Service Provided	Location
IT support providers (Processors)	IT infrastructure provision and support. Software support.	UK.
Microsoft (Processor)	Business productivity suite including email platform, document sharing and video conferencing.	UK.
Xero (Processor)	Usage analytics.	US.
Synology (Processor)	Data backups.	Germany.
Third-party couriers (Processors)	To deliver our products.	UK.

LinkedIn (Controller)	Marketing, advertising and Usage analytics.	US.
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If any of your personal data is shared with and/or processed by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8.

If any personal data is transferred outside of the UK, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in Part 8.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

10. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 20 days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

11. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Neil Wilson):

Email address: dataprotection@thermalissues.com.

Telephone number: +44 (0)1858 431 133.

Postal Address: Unit M3, Harrison Road, Airfield Business Park, Market Harborough LE16 7UL.

12. **Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available via our website. This Privacy Notice was last updated on 11th February 2022.