



PCS Group Privacy Notice

The PCS Group is made up of The PCS Group Ltd, PCS Chlorelle Ltd and Cadogan King Ltd.

This policy describes how we will handle your personal information when you use our website (www.thepcsgroup.co.uk) or when we provide services to you. We have provided this policy to ensure that you understand what personal information we may collect and hold about you; what we may use it for; and how we will keep it safe. You have legal rights to access the personal information that we hold about you and to control how we use it which are also explained.

This website is not intended for children and we do not knowingly collect information relating to children.

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You can contact us:

In writing at: Data Protection Officer, The PCS Group, 3a Horseshoe Close Oxgate Lane London NW2 7JJ. 020 7609 0044. Email: data@thepcsgroup.co.uk

OUR DATA PROTECTION OFFICER

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

If you have any questions about this privacy notice including any requests to exercise your rights, please contact the Data Protection Officer using the details provided above (see Who are we and how you can contact us).

WHAT PERSONAL INFORMATION DO WE COLLECT ABOUT YOU?

We may collect, use, store and transfer different kinds of personal information about you which we have grouped together follows:

- Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- Contact Data includes address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments to and from you and other details of services you have purchased from us.
- Technical Data includes internet protocol (IP) address, browser type and version, browser language, time zone setting and location, browser plug-in types and versions, operating system type and platform and other technology on the devices you use to access this website.
- Profile Data includes feedback and survey responses.
- Usage Data includes information about how you use our website and our services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and your communication preferences.

We do not collect any Special Categories of Personal Information about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

HOW WE COLLECT YOUR PERSONAL INFORMATION

We use different methods to collect data from and about you including:

Personal information that you provide to us. There are lots of ways in you may share personal information with us – when you correspond with us by post, telephone or email; when you register on our website; when you request services from us or in the course of providing services to you; when you subscribe to marketing materials, when you provide feedback or post on social media sites that we run. The personal information that you provide to us may include Identity, Contact and Financial Data.

Personal information that we receive from third parties

When we work with other businesses or use sub-contractors these parties may collect personal information about you which they will share with us. For example, we may receive:

- o Financial Data regarding your credit history from credit reference agencies;
- o Identity and Contact Data from an existing customer or sub-contractor that refers you to us so that we can provide you with our services,

o Identity, Contact and Usage Data via feedback from a The PCS Group company or a sub-contractor we have instructed to help us provide you with services that you have requested additional services.

Personal information we receive from publicly available sources

We may obtain Identity and Contact Data from publicly available sources such as Companies House, the Electoral Register or search engines or third-party websites.

Personal information about your use of our website. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

ARE YOU LEGALLY OBLIGED TO PROVIDE US WITH YOUR PERSONAL INFORMATION?

You are not under any legal obligation to provide us with any of your personal information but please note that if you elect not to provide us with your personal information, in some circumstances we may be unable to provide our services to you.

WHEN WE NEED YOUR CONSENT TO USE YOUR PERSONAL INFORMATION?

Whilst we always want you to be aware of how we are using your personal information, 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 information without asking for your consent where:

- We are entering into and carrying out our obligations under a contract with you; or
- We need to use your personal information for our own legitimate purposes (or those of a third party) and our doing so will not interfere with your fundamental privacy rights.
- We need to comply with a legal or regulatory obligation.
- In exceptional circumstances we may wish to use your personal information for a different purpose which does require your consent. In these circumstances we will contact you to explain how we wish to use your personal information 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 see How we use your personal information for marketing below.

WHAT DO WE USE YOUR PERSONAL INFORMATION FOR?

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following ways:

personal information that you provide to us is used to:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	<ul style="list-style-type: none"> • Identity • Contact 	Performance of a contract with you
To process and deliver services to you, including: <ul style="list-style-type: none"> • Manage payments, fees and charges • Collect and recover money owed to us 	<ul style="list-style-type: none"> • Identity • Contact • Financial • Transaction • Marketing and Communications 	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you, including: <ul style="list-style-type: none"> • Notifying you about changes to our terms or privacy policy • Asking you to leave a review or take a survey 	<ul style="list-style-type: none"> • Identity • Contact • Profile • Marketing and Communications 	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary to comply with a legal obligation • Necessary for our legitimate interests (to keep our records updated and to study how customers use review and improve our services)
To manage and administer our business	<ul style="list-style-type: none"> • Identity • Contact 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (for running our business, provision of administration and management services and in the context of a business reorganisation or group restructuring exercise) • Necessary to comply with a legal obligation
To enable you to partake in a client a survey	<ul style="list-style-type: none"> • Identity • Contact • Profile • Usage • Marketing and Communications 	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary for our legitimate interests (to study how customers use our services, to develop them and grow our business)
To make suggestions and recommendations to you	<ul style="list-style-type: none"> • Identity 	Necessary for our legitimate interests (to develop our

about services that may be of interest to you

- Contact
- Technical
- Usage
- Profile

products/services and grow our business)

COOKIES

A cookie is a small file which asks your permission to be stored on your computer's browser or hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual.

Our website uses traffic log cookies to identify which pages of our website are being used. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

LINKS TO OTHER WEBSITES

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

WHEN WE WILL SHARE YOUR PERSONAL INFORMATION

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

- other companies that are part of the The PCS Group
- any business partners, suppliers and sub-contractors we work with to provide you with services that you have requested from us.
- service providers acting as processors based in the UK who provide IT and system administration and other services.
- professional advisers including lawyers, bankers, auditors and insurers based the United Kingdom or European Union who provide services to The PCS Group
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.
- 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 and other agreements; or to protect the rights, property, or safety of our customers, ourselves or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process such information for specified purposes and in accordance with our instructions.

HOW WE USE YOUR PERSONAL INFORMATION FOR MARKETING

We will add your ID and Contact Data to our marketing database if:

- you make an enquiry about our services
- you buy our 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 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, text message, post.

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, only cleaning services) or you may ask us not to send you any marketing communications at all.

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 never share your personal data with third parties outside of The PCS Group for marketing purposes.

HOW DO WE KEEP YOUR PERSONAL INFORMATION SAFE?

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

- limiting access to personal information to those employees, agents, contractors or third parties who have a business need to know;
- only storing your personal data on our secure servers or in a secure cloud environment;
- ensuring that our staff receive regular data security awareness training;
- keeping paper records to a minimum and ensuring that those we do have are stored in locked filing cabinets on our office premises;
- maintaining up to date firewalls and anti-virus software to minimise the risk of unauthorised access to our systems; and
- enforcing a strict policy on the use of mobile devices and out of office working.

Unfortunately, sending information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of personal information sent to our website; you send us personal information 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.

We have put in place procedures to deal with any suspected personal information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

HOW LONG DO WE KEEP HOLD OF YOUR PERSONAL INFORMATION?

We will only retain your personal information for as long as necessary to fulfil the purposes for which we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements. In practice this means that we will keep:

- client details e.g. your name and contact details for 6 years.
- a record of the services we provide to you including a copy of the contract for 10 years.
- account information, invoices and payment records for 7 years.
- complaint records for 3 years.

AUTOMATED DECISION MAKING AND PROFILING

We will not use your personal information to make automated decisions about you or to profile you.

YOUR RIGHTS AND HOW YOU CAN CONTROL THE INFORMATION WE HOLD ABOUT YOU

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 email to data@thepcsgroup.co.uk or in writing to The Data Protection Officer, The PCS Group, 3a Horseshoe Close Oxgate Lane London NW2 7JJ. 020 7609 0044.

You also have rights to:

- prevent your personal data being used for marketing purposes;
- have inaccurate personal data corrected, blocked or erased;
- object to decisions being made about you by automated means or to your personal data being used for profiling purposes;
- object to our using your personal data in ways that are likely to cause you damage or distress;
- restrict our use of your personal data;
- require that we delete your personal data;
- require that we provide you, or anyone that you nominate, with a copy of any personal data you have given us in a structured electronic form such as a CSV file.

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

HOW DO YOU MAKE A COMPLAINT?

If at any time, for any reason, you are unhappy with how we hold or process your personal information, please raise your concerns with us immediately. Write to The Data Protection Officer, The PCS Group 3a Horseshoe Close Oxgate Lane London NW2 7JJ. 020 7609 0044. Or email data@thepcsgroup.co.uk

You are also entitled to make a complaint to the Information Commissioner's office at 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

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 services we offer or a change to our internal procedures or it may be to reflect a change in the law.

If our policy changes whilst we are still holding your personal information we will provide you with an updated copy of our policy.

HOW TO CONTACT US

Please contact us if you have any questions about our privacy policy or information we hold about you: by email data@thepcsgroup.co.uk or post to: 3a Horseshoe Close Oxgate Lane London NW2 7JJ. 020 7609 0044.