

**Ventol Maintenance Ltd.** is committed to protecting the privacy and security of your personal information. This Privacy Policy describes how we collect, use, and store your personal information in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

## 1. Who We Are

Ventol Maintenance Limited, Company Registration Number: 11945035 is a UK based company who undertaken construction related activities and services. Our registered office is at Unit 1&2 Landsberg, Lichfield Road Industrial Estate, Tamworth, Staffordshire B79 7XB

We are the data controller responsible for your personal information. If you have any questions about this Privacy Policy or our data protection practices, please contact us at:

- **Email:** [enquiries@ventol.co.uk](mailto:enquiries@ventol.co.uk)
- **Telephone:** 01827 300 630
- **Postal Address:** Unit 1&2 Landsberg, Lichfield Road Industrial Estate, Tamworth, Staffordshire B79 7XB

## 2. The Information We Collect About You

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

- **Identity Data:** includes first name, last name, title, date of birth, and gender.
- **Contact Data:** includes billing address, delivery 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 products and services you have purchased from us.
- **Technical Data:** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website.
- **Profile Data:** includes your username and password, purchases or orders made by you, your interests, preferences, feedback, and survey responses.
- **Usage Data:** includes information about how you use our website, products, and services.

- **Marketing and Communications Data:** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Employment-related Data (for employees/subcontractors):** includes National Insurance number, employment history, qualifications, references, next of kin details, and health information relevant to your role.

We also collect, use, and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal information but is not considered personal information in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal information so that it can directly or indirectly identify you, we treat the combined data as personal information which will be used in accordance with this Privacy Policy.

We do not collect any **Special Categories of Personal Data** 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), except where it is necessary for employment purposes (e.g., health information for health and safety assessments) or with your explicit consent.

### 3. How We Collect Your Personal Information

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

- **Direct interactions:** You may give us your Identity, Contact, and Financial Data by filling in forms or by corresponding with us by post, phone, email, or otherwise. This includes personal information you provide when you:
  - Apply for our products or services.
  - Subscribe to our service or publications.
  - Request marketing to be sent to you.
  - Enter a survey.
  - Give us feedback or contact us.
  - Apply for a job with us.
- **Automated technologies or interactions:** As you interact with our website, we will automatically collect Technical Data about your equipment, Browse actions, and patterns. We collect this personal information by using cookies, server logs, and other similar technologies.

## Privacy Policy

- **Third parties or publicly available sources:** We will receive personal information about you from various third parties and public sources as set out below:
  - Technical Data from the following parties:
    - Analytics providers (e.g., Google Analytics);
    - Advertising networks; and
    - Search information providers.
  - Contact, Financial, and Transaction Data from providers of technical, payment, and delivery services.
  - Identity and Contact Data from data brokers or aggregators.
  - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register.
  - From recruitment agencies and former employers (for employment purposes).

### 4. How We Use Your Personal Information

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

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.
- Where we have your explicit consent.

We have set out below, in a table format, a description of all the ways we plan to use your personal information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Please note that we may process your personal information for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal information where more than one ground has been set out in the table below.

# Privacy Policy

Purpose/Activity	Type of Data	Lawful Basis for Processing (including basis of legitimate interest)
To register you as a new customer/client	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your orders/services	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services, to develop them and grow our business)
To enable you to complete a survey or provide feedback	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website	(a) Technical (b) Usage	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation

Purpose/Activity	Type of Data	Lawful Basis for Processing (including basis of legitimate interest)
To deliver relevant website content and advertisements to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy) (b) Consent (for cookies that are not strictly necessary)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)
For employment purposes (e.g., recruitment, payroll)	(a) Identity (b) Contact (c) Employment-related Data (d) Financial (e) Transaction	(a) Performance of a contract with you (employment contract) (b) Necessary to comply with a legal obligation (e.g., tax, health and safety) (c) Necessary for our legitimate interests (e.g., for effective workforce management, training, and development) (d) Explicit consent (for processing special categories of data where required)

## Marketing

We strive to provide you with choices regarding certain personal information uses, particularly around marketing and advertising.

### Promotional offers from us

We may use your Identity, Contact, Technical, Usage, and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is

## Privacy Policy

how we decide which products, services, and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

### Third-party marketing

We will get your express opt-in consent before we share your personal information with any third party for marketing purposes.

### Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at [enquiries@ventol.co.uk](mailto:enquiries@ventol.co.uk)

Where you opt out of receiving these marketing messages, this will not apply to personal information provided to us as a result of a product/service purchase, warranty registration, product/service experience, or other transactions.

### Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 5. Disclosures of Your Personal Information

We may share your personal information with the parties set out below for the purposes set out in the table in paragraph 4 above.

- **Internal Third Parties:** Other companies within our group acting as joint controllers or processors and who provide IT and system administration services and undertake leadership reporting.
- **External Third Parties:**
  - Service providers acting as processors who provide IT and system administration services.

## Privacy Policy

- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors, and insurers who provide consultancy, banking, legal, insurance, and accounting services.
- HM Revenue & Customs, regulators, and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal information in the same way as set out in this Privacy Policy.
- Subcontractors, suppliers, and other business partners where necessary for the performance of a contract (e.g., specialist trades, material suppliers).
- Local authorities, building control, and other regulatory bodies relevant to construction projects.

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 your personal information for specified purposes and in accordance with our instructions.

### 6. International Transfers

We do not transfer your personal data outside the UK or the European Economic Area (EEA).

Should we ever need to transfer your personal data outside the UK or EEA, we will ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the UK government.
- Where we use certain service providers, we may use specific contracts approved by the UK government which give personal data the same protection it has in the UK.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the UK and the US.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

## 7. Data Security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors, and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

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

## 8. Data Retention

### How long will you use my personal information for?

We will only retain your personal information for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements. We may retain your personal information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting, or other requirements.

Generally, we will retain customer contract information (including Identity, Contact, Financial, and Transaction Data) for **7 years** after the end of the customer relationship for tax and legal compliance purposes.

For employment-related data, we will retain data for a period of **6 years** after an individual leaves employment, or as required by specific legal obligations (e.g., health and safety records).

In some circumstances, you can ask us to delete your data: see your legal rights below for further information.

In some circumstances, we will anonymise your personal information (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

# Privacy Policy

## 9. Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal information. These include the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully, or where we are required to erase your personal information to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal information. This enables you to ask us to suspend the processing of your personal information in the following scenarios:
  - If you want us to establish the data's accuracy.
  - Where our use of the data is unlawful, but you do not want us to erase it.
  - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise, or defend legal claims.
  - You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal information to you or to a third party. We will provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information which you initially

# Privacy Policy

provided consent for us to use or where we used the information to perform a contract with you.

- **Withdraw consent at any time** where we are relying on consent to process your personal information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us at [enquiries@ventol.co.uk](mailto:enquiries@ventol.co.uk) .

## No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

## What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 10. Complaints

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

## 11. Changes to the Privacy Policy and Your Duty to Inform Us of Changes

This version was last updated on **16th July 2025**.

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 relationship with us.

# Privacy Policy

## 12. Cookies

Our website may use cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.



Elliott Mordue

Managing Director

Date: 16-07-2025