



## Privacy Policy

### Introduction

United Technologies UK Ltd respects your privacy and is committed to the safeguarding of your Personal Data. This privacy policy aims to give you information on how we collect and use your Personal Data and tells you about your privacy rights and how the law protects you.

This policy applies where we are acting as a data controller where we determine the purposes and means of processing the Personal Data of our customers and website visitors.

It is important that you read this privacy policy together with any other privacy notice or fair processing notice that we may provide on specific occasions when we are collecting Personal Data about you so that you are fully aware of how and why we are using your Personal Data.

### Who we are?

United Technologies UK Ltd is the data controller and is responsible for your Personal Data. We have appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this privacy notice, including any requests to exercise your legal rights.

### Contact Details

Full name of legal entity:	United Technologies UK Ltd
Trading Names:	UTL Document Solutions UTL Telecoms Solutions UTL Security Solutions
Name of DPO:	Miss Tammy Thompson
Email Address:	<a href="mailto:gdpr@unitedtechnologies.co.uk">gdpr@unitedtechnologies.co.uk</a>
Address:	Unit 9 Hobbs Cross Industrial Estate Theydon Garnon Epping Essex CM16 7NY
Telephone Number:	01992 812929

### What information do we collect?

Personal data or personal information, means any information about an individual from which that person can be identified.

**Direct Interactions:** You may give us your identity and contact data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes Personal Data provided when you:

- Make an enquiry to us about our products and services
- Respond to us as part of our supplier selection
- Subscribe to our services, publications and/or communications

- Request marketing and promotional material(s) to be sent to you

**Information Collected Through Cookies and Other Technology:** When you visit our website, we use cookies and related technologies to identify your browser. Please see our [Cookies Policy](#) for more details.

**Third Party Analytics Services:** United Technologies uses third party analytics services. See here for how Google uses data when you use our Service and how you may opt out. ([www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/)). Please see our [Cookies Policy](#) for more details.

## How we use your information?

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

- Where we need to provide you with a service under our agreement with you
- To confirm and verify your identity or to verify that you are an authorised customer for security purposes
- To carry out our obligations arising from any contracts entered into between you and us
- Where we have legitimate interest in doing so to optimize the service we offer and to let you know about other products, services and promotions.
- Where we need to comply with a legal or a regulatory obligation.

By providing us with contact details such as your email address (which includes but is not limited to linking your account through Service Accent or a third-party website or network such as Go Cardless), you acknowledge we may use the email address to send you Service-related notices, including any notices required by law, in lieu of communication by postal mail. You also acknowledge that we may send you notifications of activity on the Service to the email address you give us, in accordance with any applicable privacy settings. We may use your email address to send you other messages, such as newsletters, changes to features of the Service, or special offers. If you do not want to receive such email messages, you may opt out at any given time by emailing us at [gdpr@unitedtechnologies.co.uk](mailto:gdpr@unitedtechnologies.co.uk)

Opting out may prevent you from receiving email messages regarding updates, improvements, or offers. You may not opt out of Service-related e-mails.

## What legal basis do we have for processing your Personal Data?

We have set out below – in a table format – a description of all the ways in which we plan to use your Personal Data, and which of the legal bases we rely on to do so. Please contact us if you need details from us about the specific legal ground we are relying on to process your Personal Data where more than one ground has been set out in the table below.

Purpose/Activity	Type of Data	Lawful Basis for Processing
To respond and engage in correspondence with you.	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> </ul>	Performance of a contract with you.
To process and deliver your order including: Manage payments, fees and	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Financial</li> </ul>	Performance of a contract with you. Necessary for our legitimate

charges; Collect and recover money owed to us.	<ul style="list-style-type: none"> <li>• Transactional</li> </ul>	interests (to recover debts due to us).
To manage our relationship with you: Notify you about our change in terms or Privacy Notice.	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> </ul>	Performance of a contract with you. Necessary to comply with a legal obligation.
To administer and protect our business and website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Technical</li> </ul>	Necessary for our legitimate interests (for running our business, provisions of administration and IT services, network security, to prevent fraud). Necessary to comply with a legal obligation.
To deliver relevant website content and advertisements to you.	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Profile</li> <li>• Usage</li> <li>• Marketing and Communications</li> <li>• Technical</li> </ul>	Necessary for our legitimate interests (to grow our business and inform and marketing strategy).
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	<ul style="list-style-type: none"> <li>• Technical</li> <li>• Usage</li> </ul>	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).

## Marketing

We aim to provide you with choices regarding certain Personal Data uses, particularly around marketing and advertising.

Third-Party Marketing: We will get your express opt-in consent before we share your personal data with any other companies outside of the UTL Group of companies for their own marketing purposes.

Opting Out: You can ask us to stop sending you marketing messages at any time by contacting us at any time at the following email address; [gdpr@unitedtechnologies.co.uk](mailto:gdpr@unitedtechnologies.co.uk) Where you opt out of receiving marketing messages, this will not apply to Personal Data provided to us as a result of our product/service purchase, warranty registration, product/service experience or other transactions.

## Change of Purpose

We will only use your Personal Data for the purposes of 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 Data for an unrelated purpose, we will notify you and we will explain the legal basis that allows us to do so.

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

## **How we share your information?**

### **Personal Information**

The Personal Data identified is processed by us both in the UK and potentially overseas. We may have to share your Personal Data with the following parties;

- Internal third-parties
- External third parties
- Third-parties to whom we may choose to sell, transfer, or merge parts of our business or 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 Data in the same way as set out in our Privacy Policy.

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

### **Payment Services**

We offer Go Cardless as a form of direct debit payment. All Go Cardless transactions are subject to their respective policies <https://gocardless.com/legal/privacy/>. We do not control Go Cardless' use of the data it collects.

## **How we protect your information?**

We care about the integrity and security of your Personal Data, which is why we have put in place appropriate security measures to prevent your Personal Data from being lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your Personal Data to those employees, contractors and other third-parties who have a genuine business-related reason for doing so. They will only process your Personal Data on our instruction and are subject to a duty of confidentiality.

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

## **How long we will use your Personal Data?**

We will only retain your Personal Data for as long as necessary to fulfil the purposes we collect it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for Personal Data, we consider the amount, nature and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including contract, identity, financial) for seven years after they cease being customer for tax purposes. In some circumstances you can ask us to delete your data, please see further information on Request Erasure within this policy.

In some circumstance we may anonymise your Personal Data (so that is 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.

## **What are your Data Subject Access Rights?**

Under certain circumstances, you have the following rights under Data Protection laws in relation to your Personal Data;

- Request access to your Personal Data
- Request correction of your Personal Data
- Request erasure of your Personal Data
- Object to processing of your Personal Data
- Request restriction of processing of your Personal Data
- Request transfer of your Personal Data
- Right to withdraw consent
- Right to lodge a complaint with the Information Commissioner's Office

For further clarification of your rights please refer to the Glossary below.

If you wish to exercise any of the rights set out above, please contact us using the details within this Privacy Policy. Under the General Data Protection Regulations, we cannot charge a fee for this, however, where the request is manifestly unfounded or excessive we have the right to charge a "reasonable fee" for the administrative costs of complying with the request. We can also charge a reasonable fee if an individual requests further copies of data following upon their request. We will need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data 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.

We will try and respond to all legitimate requests within 1 Calendar Month. Occasionally it may take us longer, 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.

## Glossary

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your Personal Data for our legitimate interests. We do not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your Personal Data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

**Consent** means where you voluntarily opt-in and give your agreement & permission to receive marketing communications from us.

### Request Access

Request access to your Personal Data (commonly known as a “data subject access request”). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.

### Request Correction

Request correction of the Personal Data 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

Request erasure of your Personal Data. This enables you to ask us to delete or remove personal data 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 Data 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 Data 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

Object to processing of your Personal Data 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 Data 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**

Request restriction of processing of your Personal Data. This enables you to ask us to suspend the processing of your Personal Data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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; or (d) 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**

Request the transfer of your Personal Data to you or to a third-party. We will provide to you, or a third-party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw Consent At Any Time**

Withdraw consent at any time where we are relying on consent to process your Personal Data. 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.