

**Franchise Brands Privacy Policy for Willow Pumps Customers and Prospective Customers****Title****Document Revision History**

<b>Version</b>	<b>Date</b>	<b>Revision Details</b>	<b>Author</b>	<b>Approval</b>
1	05-18	Original document	Gateley	
2	07-20	General review & update	FB plc	
3	08-21	Review and update to format	FB plc	
4	12-21	Addition of Azura Group	FB plc	
5	09-23	Addition of The Filta Group & Pirtek (UK) Limited	FB plc	
6	11-24	Revision to transfer of personal data internationally	FB plc	

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## 1 POLICY

- 1.1 References to **we**, **our** or **us** in this privacy notice are to **Franchise Brands Plc** of Ashwood Court, Tytherington Business Park, Macclesfield SK10 2XF (Registered number **10281033**) and each of its direct and indirect subsidiaries, trading under the “**Franchise Brands Group**” including **Metro Rod**, **Willow Pumps**, **ChipsAway**, **OvenClean**, **The Handyman Van**, **Barking Mad**, **Azura Group** and **The Filta Group**. Details of our brands are as follows:

**Metro Rod Limited** is a limited company incorporated in England and Wales. Registered Number: **04235803**. Registered Office: Ashwood Court Springwood Close, Tytherington Business Park, Macclesfield SK10 2XF, also trading as **Metro Plumb** and **Kemac Services**; and

**Willow Pumps Limited** is a limited company incorporated in England and Wales. Registered Number: **02762063**. Registered Office: Ashwood Court Springwood Close, Tytherington Business Park, Macclesfield SK10 2XF; and

**ChipsAway International Limited** is a limited company incorporated in England and Wales. Registered Number: 2962763. Registered Office: Ashwood Court Springwood Close, Tytherington Business Park, Macclesfield SK10 2XF; and

**Oven Clean Domestic Limited** is a limited company incorporated in England and Wales, Registered Number **04944186**. Registered Office: Ashwood Court Springwood Close, Tytherington Business Park, Macclesfield SK10 2XF, also trading as **OvenClean**; and

**The Handyman Van Limited** is a limited company incorporated in England and Wales, Registered Number **07117588**. Registered Office: Ashwood Court Springwood Close, Tytherington Business Park, Macclesfield SK10 2XF; and

**Barking Mad Limited** is a limited company incorporated in England and Wales. Registered Number: **04207457**. Registered Office: Ashwood Court Springwood Close, Tytherington Business Park, Macclesfield SK10 2XF; and and

**Azura Group Limited** is a limited company incorporated in England and Wales. Registered Number: **02531777**. Registered Office: Ashwood Court Springwood Close, Tytherington Business Park, Macclesfield SK10 2XF; and

**The Filta Group Limited** is a limited company incorporated in England and Wales. Registered Number: **04302850**. Registered Office: The Locks, Hillmorton, Rugby CV21 4PP; and

**Pirtek (UK) Limited** is a limited company incorporated in England and Wales. Registered Number: **02301810**. Registered Office: Ashwood Court Springwood Close, Tytherington Business Park, Macclesfield SK10 2XF.

- 1.2 This notice applies to you if you are an individual customer (including a sole trader or partnership) of **Willow Pumps Limited** or an employee of our corporate customer or group company of our corporate customer, who (i) has contracted with us to purchase our services/products; or (i) we have contacted you about the services/products we offer as a business. This notice does not form part of any contract to provide services/products.

This notice does not form part of any contract for services or products.

References to **we**, **our** or **us** in this privacy notice are to Willow Pumps Limited (“**Willow**”) of Ashwood Court Springwood Close, Tytherington Business Park, Macclesfield SK10 2XF (Registered number **02762063**). Willow Pumps is part of the Franchise Brands Group of companies. For further information on the Franchise Brands Group and the other entities within the Group, please see here [www.franchisebrands.co.uk](http://www.franchisebrands.co.uk).

For the purposes of this notice Willow will be the controller of any of your personal information.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we not required to do so, however, we have appointed a number of personnel to be responsible for overseeing our compliance with data protection laws. Contact details are set out in the "**Contacting us**" section at the end of this privacy notice.

We are committed to respecting your privacy. This notice is to explain how we may use the personal information we collect and use about you during and after your working relationship with us. This notice also explains how we comply with the law on data protection and what your rights are.

## 2 PERSONAL INFORMATION WE COLLECT

2.1 When you interact with us or we interact with you in relation to our products and services, you may provide us with or we may obtain personal information about you, such as the following:

- **Contact details:** information that allows us to contact you directly such as your name, email address, telephone number, addresses, emergency contact details, family members and details of availability.
- **Purchase details and requirements:** details of the products or services you have asked us to provide to you, details relating to any property you are asking us to repair or replace and any associated repair or replacement options selected or other instructions and decisions made by you in relation to our products or services;
- **Financial information:** bank accounts, credit/debit card details, payment and receipt details, refund or credit details and details of payment transactions with you;
- **Records of your interactions with us:** such as any enquiries or complaints you make, telephone conversations, letters and other correspondence (including e-mail and SMS) and your usage of our website.
- **Online account information:** use of and movements through our online portal, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information;
- **Responses to any feedback forms, surveys or competitions:** we keep records of any responses you give us that may be received directly from you or via sites including but not limited to TrustPilot, Google, Facebook;
- **Your marketing preferences:** so that we know whether and how we should contact you.
- **CCTV images:** recorded by our CCTV systems and **audio recordings** recorded by our Call Centre.

## 3 SPECIAL CATEGORIES OF PERSONAL INFORMATION

3.1 We will not generally collect, store and use the following "special categories" of more sensitive personal information regarding you:

- information about your race or ethnicity, religious beliefs, sexual orientation and political opinions;
- information about your trade union memberships;

- information about your health, including any medical condition, health and sickness records, medical records and health professional information and disability information; and
- biometric information about you, for example fingerprints, retina scans.

If we do collect any special category personal information, we do not currently rely on consent as a basis for processing special category personal information.

We will also generally not collect, store and use any criminal records information in relation to you. If we do collect any criminal records information, we do not currently rely on consent as a basis for processing criminal records information.

#### 4 WHERE WE COLLECT YOUR INFORMATION

4.1 We will collect personal information from a number of sources. These include the following:

- **Directly from you:** from yourself or the company you work for, when you use our website, make a request our services, make a claim, make a complaint, contact us by phone (either directly with us or via our Call Centre), email or communicate with us directly in some other way.
- **Companies in the same group of companies as us:** for the purpose of providing a services or products to you.
- **Our franchisees:** who may provide relevant information about your requirements.
- **Third parties authorised by you:** a family member or someone else authorised by you.
- **Our website:** provides us with information about how you use it and the devices that you use to connect to our website.
- **Advisors:** either advisors appointed by you, for example, legal advisors or advisors appointed by us.
- **Providers of information:** which may include credit reference agencies, money laundering check providers, the Land Registry, private investigators, Companies House, LinkedIn and other web platforms.
- **Sub-contractors:** such as our couriers, import/export agents, shippers, service sub-contractors, payment processors and any other third parties required to complete the provision of services to you.

We will also collect additional personal information throughout the period of the services and/or products we provide.

If you are providing information regarding other individuals to us, it is your responsibility to ensure that you have the right to provide the information to us.

If you are providing us with details about other individuals they have a right to know and to be aware of what personal information we hold about them, how we collect it and how we use and may share that information. Please refer them to our 'Rest of the World' privacy notice which can be found here <https://www.willowpumps.co.uk/about-us/privacy-policy/>. They also have the same rights as set out in the “**Your rights in relation to personal information**” section below.

**5 WHAT WE USE YOUR PERSONAL INFORMATION FOR**

5.1 The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

<b>Purpose (where relevant)</b>	<b>Personal information used</b>	<b>Lawful basis</b>
<b>To enable us to provide our services or products to you or the organisation you work for</b>	All the personal information we collect	This is necessary to fulfil our contract with you.  We have a legitimate interest to fulfil our contracts with third parties.
<b>Make payments to and receive payments from you or the organisation you work for</b>	Transaction and payment information	This is necessary to fulfil our contract with you. We have a legitimate interest to fulfil our contracts with third parties.
<b>Marketing to our services and products which may be of potential interest to you or the organisation you work for</b>	Name, personal contact details and other identifiers, and marketing preferences	We have a legitimate interest in marketing our services to you or the organisation you work for in order to make new sales. You may have requested that we send to you details of certain products and/or services. We also may have obtained your explicit consent via our website or call centre.
<b>To manage our relationship with you and any organisation you work for and operate and manage our business and internal reporting</b>	All the personal information we collect about you	We have a legitimate interest to ensure that we operate efficiently and manage our business properly.  To be able to manage and perform our contract with you.
<b>To deal with enquiries, complaints and other communications from you or the organisation you work for and dealing with legal disputes involving you or the organisation you work for</b>	All the personal information we collect about you	We have a legitimate interest to ensure that we operate efficiently and deal with any enquiries, complaints or other communications.  We have a legitimate interest to ensure that all legal claims are managed effectively.  We have a legitimate interest to fulfil our contracts with third parties.
<b>For the purposes of staff training</b>	All the personal information we collect including audio recordings	We have a legitimate interest to improve the services we provide.
<b>To perform credit checks</b>	Contact details and payment information	We have a legitimate interest in ensuring we are likely to be paid for our products or services.
<b>Perform anti-money laundering checks</b>	Your contact details	We have a legal obligation so to do.

<p><b>For National Account purposes: to provide you with and update our customer portal and/or website access and for the purposes of ensuring the security of our systems and our information including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution</b></p>	<p>Online account information and your usage of our website and any IT services or functions we make available to you.</p>	<p>We have a legitimate business in ensuring our systems are secure.</p> <p>To be able to manage and perform our contract with you.</p> <p>We have a legitimate interest to fulfil our contracts with third parties.</p>
<p><b>To conduct data analytics studies and customer satisfaction surveys to review, and better understand our customer, retention, attrition and satisfaction levels</b></p>	<p>Our customer records and any information you provide in response to our client satisfaction surveys</p>	<p>We have a legitimate interest in order to improve as a business.</p>
<p><b>For the purpose of complying with any legal and regulatory requirements</b></p>	<p>All the personal information we collect about you</p>	<p>We may have a legal obligation to comply with legal requirements and we have a legitimate interest in complying with any regulatory requirements</p>
<p><b>Storage of records relating to you and also records relating to our business</b></p>	<p>All the personal information we collect about you</p>	<p>To be able to manage and fulfil our contract with you, we may have a legal and/or regulatory obligation to do so and we also have a legitimate interest to keep proper records</p>

For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to properly perform our contract with you or comply with legal obligations. For other personal information, whilst you may not be under an obligation to provide it to us, if you do not provide it then we may not be able to properly perform our services for you as an asset manager.

You should be aware that it is not a condition of any contract with us that you agree to any request for consent from us and we do not usually rely on consent as a basis for processing your personal information. However, if we have asked you for consent, and you have given us your consent to use your personal information, you have the right to withdraw this consent at

any time, which you may do by contacting us as described in the "**Contacting us**" section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide carry out certain activities.

## 6 WHO WE SHARE YOUR PERSONAL INFORMATION WITH

6.1 We may share personal information with the following parties:

- **Any party approved by you:** for example, family members.
- **Credit reference agencies.**
- **Agencies undertaking money laundering checks for us.**
- **Companies in the same group of companies as us:** for the purpose of providing a service to you.
- **Our Franchisees and their staff:** for the purpose of providing services and/or products to you.
- **Other service providers to our business and advisors:** third party banks, administration and IT services and other service providers. All our third-party service providers are required to take appropriate security measures to protect your personal information.
- **Advisors:** either advisors appointed by you, for example, legal advisors or advisors appointed by us. **Purchasers of our business:** buyers or perspective buyers to whom we may sell or negotiate to sell our business.
- **Sub-contractors:** such as our couriers, import/export agents, shippers service sub-contractors, payment processors and other sub-contractors;
- **The Government, government bodies or our regulators:** where we are required to do so by law or to assist with their investigations or initiatives, for example HMRC or the Information Commissioner's Office.
- **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security.

We do not disclose personal information to anyone else except as set out above unless we have your consent or we are legally obliged to do so. We do not sell, rent or trade your data.

We may anonymise and aggregate any of the personal information we hold (so that it does not directly identify you). We may use anonymised and aggregated information for purposes that include testing our IT systems, research, data analysis, improving our site and developing new products and services.

We may also use Google Analytics which sets cookies to collect information about how visitors use our website. We use the information to compile reports and to help us improve the website. The cookies collect information in an anonymous form, including the number of visitors to the website and blog, where visitors have come to the website from and the pages they visited. To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>.



## 7 DIRECT MARKETING

- 7.1 **Email, post, telephone and SMS marketing:** from time to time, we may contact you by email, post, telephone or SMS with information about products or services we believe you may be interested in.

We will only send marketing messages to you in accordance with the marketing preferences you set when you create your account or that you tell us afterwards you are happy to receive or where you or the organisation you represent have purchased similar services or goods from us previously or you ask us to send you the information.

You can then let us know at any time that you do not wish to receive marketing messages by sending an email to us at [data.protection@franchisebrands.co.uk](mailto:data.protection@franchisebrands.co.uk) or by using the details set out in the “**Contacting us**” section below. You can also unsubscribe from our marketing by clicking on the unsubscribe link in any written marketing messages we send to you or letting us know during any marketing telephone call.

## 8 TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

- 8.1 The personal information we collect is not transferred to and stored in countries outside of the UK and the European Union, with the exception of any Corporate Offices outside of the UK and European Union. This may involve transferring personal information to our overseas offices in the USA, subject to the legally required protections to the personal information as required by law before it is disclosed.

Our staff and other individuals working for us may in limited circumstances access personal information outside of the UK and European Union if they are on holiday or working abroad outside of the UK or European Union. If they do so they will be using our security measures and will be subject to their arrangements with us which are subject to English Law and the same legal protections that would apply to accessing personal data within the UK.

In limited circumstances the people to whom we may disclose personal information as mentioned in the section “**Who we share your personal information with**” above may be located outside of the UK and European Union. In these cases, we will impose any legally required protections to the personal information as required by law before it is disclosed.

If you require more details on the arrangements for any of the above then please contact us using the details in the “**Contacting us**” section below.

## 9 HOW LONG DO WE KEEP PERSONAL INFORMATION FOR

- 9.1 The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements.

Generally, where there is no legal requirement, we retain all physical and electronic records for a period of approximately 6 years following the end of our customer relationship with you or the organisation you work for, because this is the limitation period for claims related to breach of contract. The exceptions to this general rule are:

- Where you or the organisation you work for have not yet become a customer and we are only engaged in marketing to you, we will retain your details for a period of 3 years since our last interaction, unless you or the organisation you work for later become a customer;

- For Google Analytics it will generally be a period of approximately 38 months after you used our website.
- CCTV images will generally be retained for approximately 30 days and then overwritten, unless required to be retained for any reason; and
- Audio recordings will generally be retained for approximately 60 days and then overwritten or deleted, unless required for any reason.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you move home or change your phone number or email address. You can contact us by using the details set out in the "**Contacting us**" section below.

## 10 YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION

10.1 You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "**Contacting us**" section below.

If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

**11 CHANGES TO THIS NOTICE**

- 11.1 We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

**12 CONTACTING US**

- 12.1 In the event of any query or complaint in connection with the information we hold about you, please email [data.protection@franchisebrands.co.uk](mailto:data.protection@franchisebrands.co.uk) or write to us at Franchise Brands plc, Ashwood Court Springwood Close, Tytherington Business Park, Macclesfield SK10 2XF.