

Privacy Policy

At TCMS (Midlands) Ltd we are committed to ensuring that the privacy of customers is protected whilst using our services. This policy sets out the basis on which personal data we collect or that you may provide will be processed by us.

Identity and Contact Details of the Data Controller

In our privacy policy the terms "we", "our" and "us" refer to TCMS (Midlands) Ltd of 38 Brearley Street, Hockley, Birmingham, B19 3NR. TCMS (Midlands) Ltd are the data controller.

Safeguarding Procedures

We are committed to ensuring that your data is secure, in order to prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information provided online, examples of these procedures are as follows:

- Fully lockable filing cabinets and cupboards which hold physical copies of data received.
- Minimal access to electronic systems, this is achieved by each terminal only being accessible by one
 person; they will be the only one responsible for that particular terminal and hold any passwords
 required to access it. This also applies to individual email accounts held and individual access to
 shared software; each employee holds separate login details and permissions.
- Departmental and Managerial access only to certain software specifically required i.e. Sage is only
 accessible via three employees, they each hold individual log in detail and are the only people able
 to see supplier and customer personal and sensitive data. Each have different levels of permission;
 one manager only has full access to data via her log in and no other person has knowledge or access
 to this log in information.

Collection of Data and Purposes of processing

We collect and process the following data about you from either your use of our website or your correspondence with us via phone or email.

In order to process your request we will need you to provide the below information, this information is collected once you have freely submitted it through our website or by phone and email. Information collected includes the following:

- Company Name and Job Title
- Contact information such Full Name, Email address and Contactable Number
- Demographic information such as postcode.
- Description of works required



The above provided and collected information helps us to understand your requirements and provide you with a better service, particularly for the following reasons:

- Internal record keeping i.e. Enabling us to phone and email you regarding agreement of works being carried out or initially supplying you with costing's and procedural processes. Supplying you with required security information in regard to gaining access to sites.
- To improve services required and provided i.e. maintaining regular and constant communication in relation to providing specific service requirements.
- To notify you of any changes to our services.
- We will from time to time contact you regarding scheduled work and future cleaning requirements.

Further data which we collect and process

- We collect/process and store records of all correspondence and communications you have with us, this is to enable us to maintain an information chain incase issues arise in the future.
- All calls are recorded and monitored for training purposes.
- We also collect and store the following information upon each visit to our website: IP address used, browser type and version, operating system/platform, area location, visitor path (how you arrived at our site), number of past visits, time spent onsite and which areas and pages you have visited/viewed or searched for.

We collect and use the above information for several purposes, these include:

- To enable us to administer our website i.e. troubleshooting, data analysis, research and statistical purposes.
- Improvement of our website, keeping it updated and current
- As part of our efforts to maintain our websites security

Legal basis for processing personal data

We are required by new GDPR regulations to have one or more lawful grounds to process your Personal data, our legal basis for collecting and using the personal data described above will depend on the personal data concerned and the way we collect it. We will normally only collect personal data from you where we need it to; supply you with available service information, to carry out site surveys, supply quotations thereafter and to perform a contract with you i.e. to manage the relationship and be able provide you with specific requirements needed. We only process this data where we have your freely given consent to do so.

Our Legal Basis for processing personal data 'freely given' is and may be for the following reasons, dependant of the relationship going forward:

- **Consent**-We will ask for your consent to use your information to send you email correspondence, correspond with you via phone and to be able share your details when necessary to do so.
- Contractual-Where both parties are entering into a contract of works.
- <u>Legal Obligations</u>-Where TCMS (Midlands) Ltd need to process data in order to comply with Laws we are bound to, we will only do this if strictly necessary.
- Vital Interests-where Personal data is required in order to save a person's life.



- <u>Public Task</u>-Where TCMS (Midlands) Ltd are performing a task within public interest or for your official functions and the task or function has a clear basis in Law.
- <u>Legitimate Interests</u>-Where we process personal information that we collect from you when during use of our website. It is in our legitimate interests as a business to process the above information in order to administer our website, to ensure that content from our website is presented to you effectively and securely.

All processing which isn't simply based on consent and requires further processing will be made clear to you at time of collection or use— consent can be withdrawn at any time by contacting TCMS (Midlands) Ltd on the below details.

Who we share your personal data with

We take care to allow access to personal data only to those who require such access to perform their tasks and duties and to third parties who have a legitimate purpose for accessing it. Whenever we permit a third party to access personal information, we will implement appropriate measures to ensure the data is used in a manner consistent with this notice and that the security and confidentiality of the data is maintained. We will not sell, distribute or lease your personal information to third parties unless we have your complete permission to do so or are required to by Law.

Transfers to third-party service providers

In addition, we make certain personal data available to third parties who provide services to us. We do so on a "need to know basis" and in accordance with applicable data protection and data privacy laws.

Disclosure of your information to third parties will be issued in association with the following:

- 1. Our payment processors, for the purpose of processing your payment/s.
- 2. To allow third party analytics suppliers that work with us for the purposes of producing aggregate statistics about customers, sales, traffic patterns and related site information we use this information for the purposes detailed above and the third-party suppliers use this information to inform their own analytics products and services.
- 3. For monitoring in connection to training purposes.

Further transfers to other third parties

We may also disclose personal data to third parties on other lawful grounds, including:

- To comply with our legal obligations, including where necessary to abide by law, regulation or contract, or to respond to a court order, administrative or judicial process
- In response to lawful requests by public authorities (including for national security or law enforcement purposes)
- As necessary to establish, exercise or defend against potential, threatened or actual litigation
- Where necessary to protect the vital interests of our employees or another person In connection
 with the sale, assignment or other transfer of all or part of our business; or With your freely given
 and explicit consent



Data Subjects' Rights

You may request details of your personal information which we hold about you under the 'EU General Data Protection Regulation'. If you would like a copy of the information held please email TCMS (Midlands) Ltd at info@tcmscleaning.com.

If you would prefer your information to be erased please email at info@tcmscleaning.com or write to TCMS (Midlands) Ltd-38 Brearley Street, Hockley, Birmingham, B19 3NR.

For further information on personal data which is requested and/or held or if you wish to make a complaint regarding use of personal information please contact the ICO (Information Commissioner's office) on 0303 123 1113 or at www.ico.org.uk.

Necessary Contractual Requirements

If choosing to enter into a contract with TCMS (Midlands) Ltd for the provision of Daily Office Cleaning Works, it will be necessary to provide us with personal details in order for us to provide you with all service requirements requested and to assist in further agreements being made.

Automatic Consent

If you choose to bypass our initial online contact sheet and contact us direct by telephone 0121 333 5824 then we will automatically receive your contact number on our telephone system as we use caller ID, by choosing this method of contact you are automatically agreeing to us receiving your information. If you believe any of the information we are holding is incorrect or incomplete, please write to us or email us as soon as possible and we will promptly correct any information found to be incorrect.

General Consent

TCMS requires consent to enable us to process both types of personal data but this must be explicitly given, where we are asking for sensitive personal data, we will always inform you of why this is required and tell you how any information received is to be used.

By consenting to this privacy statement, you are giving us explicit permission to process all personal data provided and to store on our systems for the above period of time.

Policy Enforcement

This policy is effective from 25th May 2018; however you should check our website from time to time to ensure you are happy with any changes TCMS (Midlands) Ltd may make to this policy.



Signed By: Michael Dainty

Signature:

Position: Managing Director

Date Signed: 27th January 2025

Review Date: 27th January 2026