

# Privacy & Cookies Policy

## The Policy

Kandi Kleaners LTD are committed to protecting any data that we collect concerning you. This includes having security systems in place and strong contractual agreements in place where we use third parties. Our holding of your personal data uses one of three lawful reasons for holding that data, which is not necessarily just your consent. If you are concerned by this please continue to read.

This privacy policy sets out how we gather, use, hold and protect ("process") any personal information that you give to us when you contact Kandi Kleaners LTD or use our App/Website. We provide this information to you in the English language only. By continuing to use Kandi Kleaners LTD you are accepting this policy.

Some personal data is essential to our App/Website functioning and our supplying a product or service to you. If you do not wish to allow us to process your data then you will not be able to use our services.

Useful contact details and a summary of the control you have over your personal data can be found at the end of this policy.

## Compliance

In processing personal data, we will comply with relevant legislation in force from time to time in England. We may change this policy from time to time by updating this policy as we improve our service to you and as relevant Data Protection legislation comes into force including the General Data Protection Regulation (EU) 2016/679. Your personal information will continue to be held in accordance with our policy as it develops. We will not reduce your rights under this policy without your explicit consent.

## Legal Basis for Processing

### Likely Processing

We gather data on four groups,

1. the non-registered viewer of our App/Website in which our services are described ("Viewer"),
2. our customers registering to place Bookings for domestic services "Customers")
3. our services personnel who work with us to provide services to our Customers ("Service Agents")
- 4.

Where you are merely a Viewer we will normally only gather data indirectly but might also do so directly if you i) request further information from use ii) engage with us on social media as examples. Lawful Basis

We are required to process your personal data in a lawful, fair and transparent manner.

Consent – where you are a Viewer you will be accepting our cookie policy in order to continue to view how our products and services operate, or if you have consented to contact with us we will be holding your personal data as part of our marketing. We detail below the extent of indirect use of data which is anonymised and is not designed to identify you individually.

Contract – where you are inquiring about Booking with us, working as part of our services network, where you are a Viewer sending us enquiries, or during the process of registering with us, we process data necessary to answer your enquiry and process your account in order to provide you with the services. Our service may include being in contact with you as follow up even after your initial question has been answered, to maintain your registration with us including carrying out verification checks on in accordance with our terms of business or otherwise.

Legitimate Activities – where we are required to store information for legal purposes, for example where you have been a Customer or Service Agent for contractual purposes as above, we do so as part of our legitimate activities as a lawful business.

#### **Data Controller and Processor**

Kandi Kleaners LTD makes the decisions concerning how personal data through Kandi Kleaners LTD is processed. Accordingly we are the Data Controller for your personal information. Therefore we should be your first point of contact.

Kandi Kleaners LTD may use a third party to help power its App/Website and/or Supplier, Customer and networking contact management system at our discretion. This provides you with an improved service and better user experience. They process your personal information as set out in this policy and they do so under our direction. Accordingly they act as a Data Processor. Should you have any concerns about this please do not hesitate to contact us.

In certain circumstances where we are given personal data for the reference of others, we act merely as Data Processors, where we process information under direction of third parties. These limited examples might include where Service Agents or those networking with us provide us with contact details of others.

#### **Kandi Kleaners LTD's App/Website Anonymous Tracking**

Some personal data may be processed by us when you are merely browsing our App/Website.

## **Cookies**

You can choose to accept or decline cookies from our App/Website.

A cookie is a small file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser on your device when you visit a website. The identifier is then sent back to the server each time the browser requests a page from the server. The cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies help us provide you with a better site by tailoring the App/Website operations to your needs and to respond to you as an individual user such as identifying which pages you find useful and which you do not.

Such a cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us, however do note that personal information that you do share with us may be linked to the information stored in and obtained from cookies.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our App/Website in order to tailor it to users' needs. We only use this information for statistical analysis purposes and does not identify you individually.

For example we might use an email delivery service, to send marketing emails and alerts about Kandi Kleaners LTD's operations. This service uses cookies to send relevant information to you, depending on your usage. For example you can view the privacy policy of MailChimp, one of these service providers, at <https://mailchimp.com/legal/privacy/>.

Merely by browsing our App/Website, Kandi Kleaners LTD tracks your use so that we can offer you a better user experience relating to your navigation habits. This helps us analyse data about social media traffic and improve Kandi Kleaners LTD in order to tailor it to the needs of our customers.

### **Google Analytics**

Our App/Website uses tracking technology to help us to analyse user behaviour.

Google Analytics is an example of this technology. It is an analysis service by Google Inc., 1600 Amphitheatre Parkway Mountain View, CA 94043, USA. Google Analytics allows us to analyse the use of our App/Website application usage.

The information about your visit collected by Google Analytics is usually transferred to a Google server in the USA and saved there.

Google will use the information collected on behalf of the application operator to evaluate the users' use of the application, to compile

reports about the users' activities within this application, and to provide further services for the application operator related to the use of the application.

We will not gather any personally identifiable information about you through Google Analytics. You can find more information about what data can be collected via Google Mobile App Analytics at <http://support.google.com/analytics/bin/answer.py?hl=en&answer=2568871>.

By using the App/Website, the user explicitly consents that his or her information is collected via Google Analytics.

### **What we might collect**

Kandi Kleaners LTD collects the following types of information.

- identification of your past and current use of Kandi Kleaners LTD, its App/Website and its product pages
- technical information from your device to enable it to interact with our system
- information about your visits including page response time, pages visited, methods of browsing and similar

### **Direct Information Gathering**

Some personal data may be processed by us when you have requested a product or service from us, whether as part of an agreement to purchase from us, merely requesting further contact from Kandi Kleaners LTD or registering to post comments or information with us.

### **Risk and Personal Data**

Please note that sending information over the internet is not completely secure and we cannot guarantee the security of your data while it is in transit. *Any data you send is at your own risk. Please do not include special category personal data when communicating with us.*

### **What we might collect**

- name
- contact information including postal address, email address and telephone contact details depending on the service you are requesting
- demographic information such as location and type of lodgings, number of rooms etc
- other information relevant to your Booking preferences
- whether you are interested in assisting us as a Service Agent and commercial details relating thereto

· interest in customer surveys and/or offers

### **Personal Payment Information**

We will be taking your payment details, however these are processed by our third party payments provider (at present Stripe Payments) and stored on their site. Stripe have their own privacy policy which can be found at: <https://stripe.com/gb/privacy>. We do not store your personal payment information.

#### Location Data

We store and disclose Customer location data to third parties, specifically our Service Agents, to assist our delivering products to you. If you are a Service Agent your location will be stored to assist with

### **Collection, Compilation & Use of Data**

In order for Kandi Kleaners LTD to provide you with the Services you have requested, it is essential and part of the contract with you that we:

- i) communicate with you using your contact details reporting progress of your Booking;
- ii) hold onto and connect data together to identify you and your preferences.

This will include location data, your name and similar information, demographic information, Bookings data and price options.

Should you wish to no longer accept push notifications from the App then you will need to change your phone settings.

Should you no longer wish to receive any notifications whatsoever concerning details of or modifications to your Booking then we will not be able to provide services without your use of the App.

### **Testimonials& Feedback**

We would be delighted if you would provide us with testimonials of your great experiences with us. We will review these before placing them on our marketing literature including our App/Website and will only use your first name or an assumed name if you so wish.

Should you wish for your testimonial to be removed please let us know using the contact details provided below.

We use a third party service to assist us with our feedback services. You can find their privacy policy here <https://uk.legal.trustpilot.com/end-user-privacy-terms> and <https://www.checkatrade.com/privacy> .We ask that you do provide this feedback as this is valuable to our developing our services and we will send you notifications after the completion of jobs asking for feedback as

part of our normal service. However should you no longer wish to receive such notifications, you can do so by adjusting your phone settings for that App.

Should you be unsure how to do this, please feel free to contact us directly by email.

### **Customer Experiences**

We may also keep data to record the appreciation shown by a customers and their experiences. This is for internal purposes to enable us to check that we continue to provide an excellent service. If the record is initiated by us then we will anonymise it, using only first names. We also collect reviews of our services and Service Agents through Google and Facebook social media, whose privacy policies can be found on their respective websites.

### **What we do with the information we gather**

We take different types of information from you. Processing of anonymous data is either stored on your device and not accessed by us (eg cookies) or informs our statistical analysis on App/Website and page use (eg traffic cookies, Google Analytics).

Processing of your personal information involves a number of different actions depending on why you have supplied us with information:

### **Storage**

The information we hold about you may be stored outside the European Economic Area in order to process your data.

Initially your personal information is held securely by our third party IT supplier. They would not normally view or use your personal information unless there is an issue with the use or security of holding your data.

We hold your data securely. This is held in accordance with our retention periods policy below.

### **Anonymous Tracking**

We collect anonymous data for the following and similar purposes:

1. to customise Kandi Kleaners LTD according to your preferences and needs
2. to improve how we display information on our products and services on our App/Website for your benefit and in keeping with your device
3. to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
4. to allow you to participate in interactive features of our service, when you choose to do so;
5. as part of our efforts to keep our site safe and secure;
6. to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;

7. to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

### **Initial Response**

We require your personal information to make our initial response that you have asked for.

Information Requests: we will take your name and address to accurately send to you our latest sales information or information on how our App/Website works.

### **Further Processing**

Once information is received by us through your registration with us it is stored centrally. We then use your contact details and other information relevant to your registration in order for use to be in contact with you and supply our services to you.

The personal information enables us:

- to operate the Kandi Kleaners LTD customer service and respond to your enquiry
- arrange delivery of your products ordered to you using our own or third party delivery business to whom we will disclose your data essential to make the delivery
- for internal record keeping, to manage your enquiry at times convenient to you.

Your registration data will be held by us in accordance with our retention periods policy below.

### **Supplying your data to third parties**

Where we must share your data for the purposes of providing you with the services you have requested we will use reasonable endeavours to put in place contractual and practical systems to protect your personal information securely.

### **Future Marketing**

- depending on your consent we may periodically use your contact details to send you promotional emails or texts about new products, special offers or other information which we think you may find interesting using the contact details which you have provided
- depending on your consent to contact you, using your contact details, for market research purposes
- depending on your consent, supply of your contact details to third parties for use with related marketing messages

Your contact information for future marketing will be stored centrally with our third party provider. The use of your personal information for future marketing is managed by our third party provider.

### **Request for Deletion of information**

If you have provided your consent to receive future marketing messages then we will hold this information until you indicate that you no longer wish to receive messages from us.

If you contact us to indicate that you no longer wish to receive messages from us we may store that indication centrally.

### **Contracts with you**

We will use information obtained via our App/Website to finalise contracts with you. Such information will be held in our customer records. Should such data be used to assist in Bookings or contracts made with you then that information may be held as part of our accounting records held by us for compliance purposes. Only data sufficient for these purposes will be held and this data will be held securely and is kept separately and only for the purposes of tax compliance.

### **Retention Periods**

Unless stated herein, we set out here our general policy with respect to the periods we hold onto your data.

Contract – if you have a contract with us then we will hold onto your data for as long as our contract lasts with you plus 6 years, except where legal compliance obligations require us to hold onto this data for longer.

Consent – where you have provided consent to processing your data either for us to send you marketing messages or you are part of our service network we will hold onto your data until you have withdrawn your consent to the processing.

Legitimate activities – where we process your data for our legitimate business purposes we will hold onto this data for 6 years or as long as we are required to by law or regulation.

### **Business Purchase or Sale**

Please note that if the business were to be sold or transferred or we were to purchase another business, your data will be transferred with it but only as part of the business as sold or transferred. Your personal information may be disclosed to a prospective buyer or seller of such business.

### **External Sites and Social Media**

When you connect to or from Kandi Kleaners LTD using external App/Websites please be careful to check whether the external site is one controlled by us (usually our social media spaces on platforms such as Facebook, Twitter or LinkedIn) or those used by third parties. We cannot control the information practises of other companies and organisations that might advertise, display, link to, or offer to obtain our goods or services for you. We cannot take responsibility for, cannot control and this policy does not cover spaces on the internet not controlled by us.

### **Linking to other App/Websites**

Similarly our App/Website may contain links to enable you to visit other App/Websites of interest easily. However, once you have used these links to leave our site, you should note that we do not have any control over that other App/Website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the App/Website in question.

Note also that third party cookies might be downloaded onto your device as a result of your use of this App/Website, for example if you were to send information to or from this App/Website to your social media account your account may require the use of such cookies to enable this transfer to take place. These cookies are not under our control and we disclaim any responsibility for the acts of third party cookies.

#### **Posting Comments & Social Media**

Please note that if you choose to post comments on this App/Website or via our social media accounts containing personal data we cannot accept responsibility for the use or misuse of such data by others who have access to such posts and we suggest that you consider carefully before posting any such data. We use social media platforms including Facebook, Twitter and LinkedIn as well as posts on Google. Please note that we may review tracking data generated by social media providers such as Facebook for measuring how useful our social media presence is for you.

### **Social Media Data Gathering**

We employ technology to help us identify when you might have encountered us through social media or to send you targeted marketing messages relating to products we have to offer during your social media experience. The use of this technology does result in our holding your personal contact details and likes and dislikes. We do not categorise this information based on what the law describes as "sensitive personal data".

### **Controlling your personal information**

## **Your Rights**

Data Protection legislation gives you certain rights to control of your personal data. These are:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling

Further information on these rights and how to complain can be obtained from the UK Information Commissioner whose App/Website is at: [www.ico.org.uk](http://www.ico.org.uk).

We fulfil these rights in the ways set out below however we do reserve our right to continue to process your data or refuse your requests as set out in relevant legislation.

## **Privacy Policy**

We provide you with information on our use of your data by detailing the information we gather and process in this Privacy Policy.

## **Cookies**

You can choose to accept or decline cookies from our App/Website. Most web browsers automatically accept cookies, but you can modify your browser setting to decline cookies if you prefer. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and cookies via these links:

- <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-App/Website-preferences> (Firefox);
- <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);

- <https://support.apple.com/kb/PH21411> (Safari); and
- <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

However, if you block cookies, you will not be able to use all the features on our App/Website and will not be able to use our platform.

## **Consent**

You have control over the information you supply to us whether by:

1. consent gained from your continuing to browse our site, or
2. your explicit consent by completing a contact or registration form, or
3. your explicit consent to further processing to send you ongoing marketing material concerning our services, or
4. by your contacting us about your personal information as described below.

The situation in which you give this information will inform our understanding of the consent you have given and the direct purpose for which you supply your data. If you choose to withdraw your consent to the processing of your personal information at any time then you should inform us in writing using our contact details below.

## **Data Requests**

You may request details of personal information which we hold about you under the relevant Data Protection legislation in force at the time (a "Subject Access Request"). If you would like a copy of the information held about you, please email us.

## **Data Correction, Complaints & Deletions**

If you believe that any information we are processing on you

- is incorrect or incomplete, (perhaps for example because you have seen your name spelt incorrectly or someone else has received a call meant for you) or
- is being mis-used (perhaps for example a company you don't know has contacted you using information you supplied to us and you didn't agree to this), or
- should no longer be processed by us (perhaps for example because you no longer wish to be contacted)

then please email us as soon as possible. We will promptly correct or delete any information found to be incorrect or no longer necessary and deal with your complaint. These rights to object are subject to our right to consider whether we are permitted or required to continue the processing in which event we will inform of our reasons.

We ask that if you have any concern you first approach us via our contact email address [info@kandikleaners.co.uk](mailto:info@kandikleaners.co.uk).

Should you wish to take the matter further we ask that you contact us in writing setting out your concerns in detail to enable us to provide you with an effective response.

### **Right to Erasure (Right to be Forgotten)**

Further information on this new right can be found on the UK Information Commissioner's website at <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-erasure/>.

Please note that this right is not absolute. For example, a request that information is erased can be rejected if the Data Controller needs the data to comply with a legal obligation or for the establishment, exercise or defence of legal claims.

### **Lawful Disclosure by Us**

Please note that you hereby provide your consent and in any case we may be required to disclose your data to lawful authorities for the prevention of crime or regulatory purposes or a court as such court requires. In some circumstances we may not be permitted to inform you that we have made such a disclosure.

### **Contact Details**

Kandi Kleaners Limited is the trading name and registered in England and Wales as company number 10179172.

Our contact email address is [info@kandikleaners.co.uk](mailto:info@kandikleaners.co.uk). Any Subject Access Request should be made to the following email address [admin@kandikleaners.co.uk](mailto:admin@kandikleaners.co.uk).