

**Data controller:** Liftec Lifts Ltd.  
Unit 7, Orbital One,  
Green Street Green Road  
Dartford  
DA1 1QG

**Data protection officer:** Andy Ward – Compliance Manager

## **Introduction**

Liftec Lifts Ltd (the Company) is committed to protecting the privacy and security of your personal information.

This Privacy Notice describes how the Company collects and uses personal information about you during the maintenance contract life cycle with the Company, in accordance with the General Data Protection Regulation (**GDPR**).

The Company collects a range of personal data about third party customers / Tenants as part of its contractual obligations to comply with its Service provision to its clients, whether it be direct or indirect.

Liftec Lifts Ltd. is a “Data Controller”. This means that the Company is responsible for deciding how it holds and uses personal information contained in this privacy notice.

It is important that you read this notice together with any other privacy notice the Company may provide on specific occasions when it is collection or processing personal information about you, so that you are aware of how and why the Company is using such information

## **Data protection principles**

Liftec Lifts Ltd will comply with data protection law. This says that the personal information the Company holds about you must be:

- used lawfully, fairly and in a transparent way;
- collected only for valid purposes that the Company has clearly explained to you, and not used in any way that is incompatible with those purposes;
- relevant to the purposes the Company has told you about and limited only to those purposes;
- accurate and kept up to date;
- kept only as long as necessary for the purposes the Company has told you about and
- kept securely.

The Company collects and processes personal data relating to its customers to manage the supplier and customer relationship.

The Company is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

### **What information does the Company collect?**

The Company collects and processes a range of information about customers. This includes:

- your name, address and contact details, including telephone number.
- full names and contact telephone number of family members, helpers or aid workers;
- in the case of vulnerable adults, information about access to premises or special instructions on your residence;

The Company collects this via the main client which could be your housing association or council, which they would have obtained from you. The data is provided to Liftec in electronic format from its main client upon that award of the maintenance contract.

Data is stored in a range of different places in the Company's customer management systems and in other IT systems (including the Company's email system).

### **Why does the Company process your personal data?**

The Company needs to process data to take the necessary steps to make arrangements to maintain or repair lift equipment, stair lifts or platform lifts.

The Company has a legitimate interest in processing your data in carrying out its contractual maintenance or repair obligations as required by its client (council or housing association) These records allow the Company to manage the planned maintenance and breakdown response processes effectively. The Company may also, from time to time, need to process data from customers to respond to and defend against legal claims.

### **Who has access to data?**

Your information will be shared internally, including with members of its customer service team, field engineers and night call desk operators

The Company may share your data with, and third-party specialist product service providers to respond to equipment breakdowns and repairs.

The Company will not transfer your data to countries outside the European Economic Area.

**How does the Company protect data?**

The data will be stored in electronic formats (including email) on The Company's internal IT systems. The Company takes the security of your data seriously. The Company has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees and third-party service providers in the performance of their duties.

Where the Company engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and Company measures to ensure the security of data. Furthermore, the Company has implemented the following measures to mitigate data breaches.

### *Network based mitigation*

- Installed IDS/IPS with the ability to track floods (such as SYN, ICMP, etc.)
- Installed a firewall that has the ability to drop packets rather than have them reach the internal server. The nature of a web server is such that we allow HTTP to the server from the Internet. We monitor our server to know where to block traffic
- Daily antivirus (AVG) and anti-malware check
- 128-bit SQL server encryption
- We use WinZip AES-256 to encrypt sensitive data/documents
- Have contact numbers for our ISP's emergency management team (or response team, or the team that is able to respond to such an event). We need to contact them in order to prevent the attack from reaching your network's perimeter in the first place
- Monthly or (for sensitive contracts) weekly password changes. Use of 12-character strong alphanumeric passwords; password lock-out for 5 failed attempts; password history of 20; password expiry 45 days

### *Host based mitigation*

- Ensure that HTTP open-sessions time out at a reasonable time.
- Ensure that TCP also time out at a reasonable time
- Install a host-based firewall to prevent HTTP threads from spawning for attack packet

### *Penetration testing and vulnerability scanning*

- We conduct internal phishing campaigns to test cyber awareness of our own employees
- External assessments of our infrastructure and security policies (Microfix Ltd.)

All Liftec employees; workers or contractors who in their roles are responsible for processing personal data are bound by confidentiality agreements in their contracts and as part of company policies.

### **For how long does the Company keep data?**

Documentation relating to a Construction contract and/or Minor Works (CP job) – 10 years\*

Documentation relating to a Repair Contract/small repair works/service (RC job) – 2 years\*

Documentation relating to a service/maintenance contract (SC job) – 2 years\*

Accounts/Tax information – 7 years\*

\* It should be noted, that in the event of a legal case being held against any contract file, the length of time the documentation is required to be retained for, can be extended.

### **Your consent**

The Company does not need your consent if it uses special categories of your personal information in accordance with its written policy to carry out our legal obligations or exercise specific rights in the field of its contractual obligations. In limited circumstances, the Company may approach you for your written consent to allow it to process certain particularly sensitive data. If the Company does so, it will provide you with full details of the information that it would like and the reason it is required, so that you can carefully consider whether you wish to consent. You should be aware that you do not have to agree to any request for consent.

### **Your rights**

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the Company to change incorrect or incomplete data;
- require the Company to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where the Company is relying on its legitimate interests as the legal ground for processing; and
- ask the Company to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the Company's legitimate grounds for processing data.

If you would like to exercise any of these rights, you can make a subject access request by completing the Company's form for making a subject access request. You can request this

form by contact the Company, at [hr@liftec.co.uk](mailto:hr@liftec.co.uk), or [andy.ward@liftec.co.uk](mailto:andy.ward@liftec.co.uk), via the process recommended by your local council, housing provider or care home.

If you believe that the Company has not complied with your data protection rights, you can complain to the Information Commissioner.

**What if you do not provide personal data?**

If you elect not to do so however, the Company will not be able to process your data in order to respond to repair or maintain the identified equipment within the maintenance contract.