



It's your data and it belongs to you.

This is our privacy policy and notice for the way in which we handle your data, why we hold data about you and how you can help us manage your data.

We are N4 Gas Ltd, a company registered in England (6472503) and can be contacted at any time on [0208 050 4729](tel:02080504729) or office@n4gas.co.uk should you have any questions on our policy.

This document aims to explain every aspect of how we obtain and manage your data, as well as your statutory rights. It describes the data processing activities that are carried out by us in relation to your data and sets out the policies we use to ensure your data is used in a responsible and legal way.

We may update this policy from time to time to ensure it is always up to date and accurate. Any changes we may make to our policy will be reflected in this document which can be accessed via our website at the URL <https://www.n4gas.co.uk/privacy>

This policy was last updated 16-December-2019.

Structure of document.

We aim to be as open as possible in the way we handle and process your data. Our privacy policy has been structured in the following format:

- Personal data that we collect.
- Sources that provide us with your personal data.
- When and to who we share your personal data with.
- What we use your personal data for and why.
- Our website, cookies and social media presence.
- Managing personal data held with us.
- Your rights in relation to your personal data.

Contacting us.

Should you have any questions, concerns or comments regarding this policy, please refer them to the data below. We aim to respond to all queries within 2 working days of a request or concern being raised.

Phone us: [0208 050 4729](tel:02080504729)

Send an email to: office@n4gas.co.uk

You can send mail to: N4 Gas Ltd, 15 Granville Road, London. N4 4EJ

Our legally registered business address is: First Floor 677 High Road, North Finchley, London. N12 0DA



Personal data that we collect.

Here we set out the details of the types of personal data we collect. We subsequently set out what we use the data for:

- **Your contact details and the contact details of people associated with your account:** information that allows us to contact you directly such as your name, email address, telephone number and addresses associated with your account.
- **Account information and details of other people linked to your account:** information about your account with us including any login details for our website, unique account number, contract details, job details (e.g. boiler repairs), household details, property type, premise details, meter details, marketing preferences, repairs and service history, claims history, complaints details, incident details, and dispatch appointment details.
- **Vulnerability information:** information that allows us to understand whether you are in a vulnerable situation, including health and disability information.
- **Transaction and payment information:** credit/debit card details and bank account details you provide to make payment for the products and services you purchase from us.
- **Records of your discussions with us, including call recordings, text messages and emails:** when you share comments and opinions with us, ask us questions or make a complaint we will keep a record of this. This includes when you send us emails, phone a member of our team or contact us via SMS or through social media such as through Twitter or on Facebook.
- **How you use our website:** we use technology such as cookies (subject to your cookie preferences) when you use our website, as well as our pages and profiles on social media sites, and we collect information about the pages you look at and how you use them.
- **Location information:** your smartphone or computer's IP address may tell us an approximate location when you connect to our websites but this will be no more precise than the city, state or country you are using your device in.
- **Device and machine information:** information about the computer hardware and software on your computers and smartphones that is used to connect or communicate with us.
- **Exercising your rights:** if you exercise any of your statutory rights under data protection law, we will keep a record of this and how we respond.

You are not required to provide to us any of the personal data described above, however, if you do not do so, you may not be able to purchase or receive products and/or services from us.

Sources that provide us with your personal data.

We collect personal data from several sources. These may include:

- **Directly from you:** when you set up an account with us or purchase a product or service from us, submit information via our website, complete forms we provide to you, make a complaint, exercise your statutory rights, contact us by phone, email or communicate with us directly in some other way (SMS or Social media).
- **Our website:** we collect information about how you use our website and the device(s) you access our site from.
- **Other companies and persons that we work with:** provide us with information to help us deliver our products and services to you. These may include:
 - **Landlords and their agents:** who may provide relevant information about the products and services bought on their behalf for deployment within your home.
 - **Partnered companies:** may provide relevant information about products or services you may be interested in, exclusively used for matched leads or referrals of work. For example, a plumbing company may pass your details to us, so we can undertake a repair on your boiler.
- **Other people linked to your account:** if someone else is registered as a contact on your account, we may receive information from them which we will use to update your data that we hold on record.
- **Public and private registers:** such as the Land Registry, Zoopla or Google and it's linked public source network provide us with information about your property.
- **Service engineers:** who will provide us with information about your boiler, central heating system, property and any discussions, opinions or comments you may express whilst they are working within your environment.
- **Credit reference and debt collection agencies:** we may refer to data obtain from credit and debt management agencies when assessing your credit worthiness or handling unpaid invoices.

When and to who we may share your personal data with.

We share personal data with the following categories of third parties:

Category of receiver.	Examples of data sharing.
Companies in the same group of companies as us.	N4 Electrical Services
Any party approved by you.	Finance companies, insurance providers or third parties involved with you by explicit association and on request.
Other people authorised to access your account.	Joint account holders or additional house holders where information has been requested by the third party with a legitimate reason to request such information. This may include possible location if we expect you to be home, but someone else is home instead.
Other people or companies associated with your account.	Landlords and their agents may be passed personal data to update and maintain their records where inaccurate information is provided to us, we may provide correction data back to the agent/landlord.
Delivery companies.	In the event we need to post information or products to you.
Insurance providers and their underwriters.	In the event of a claim against our insurance, we will pass relevant personal data to such parties to allow them to process the claim.
Companies and service providers that allow us to run our business.	Personal data may pass through service providers which enable us to offer our services such as our phone lines, IT systems, mobile phone systems, navigation equipment, payment systems and accounting procedures. We utilise a variety of service providers, a full list is maintained by us and is available on request.
Debt collection and credit referencing.	We may share personal data with debt collection agencies in the event of late or missed payments and we may seek credit referencing where finance or invoicing terms are offered.
Industry partnered companies.	Such as boiler manufacturers or materials suppliers for the purposes of warranty. Gas Safe Register may also request personal data from time to time for the purposes of complaint management and auditing processes. National Grid may also be passed on personal data when needs arise such as supply issues within your property being identified.
Government bodies.	The police, HMRC and the health and safety executive may all request personal data from time to time.

What we use your personal data for and why.

We require your personal data to allow us to operate our business.

Purpose.	Types of data involved.
Opening an account.	Contact, residential and property information of you and persons linked to you for the purpose of providing our service. We may request all data as described previously in this document to validate suitability and allow us to operate a more seamless service throughout the following stages.
Providing a service visit.	Contact, residential, property and vulnerability data allowing our engineer(s) or service providers to access and complete the works requested.
Providing financial follow-up. Quotes & invoicing.	Contact, transactional and financial data associated with an account, along with limited property data associated with the works requested and subsequently undertaken.
Handling complaints.	We may utilise any data collected and held on file to help aid in complaint resolution.
Reminder & follow-up procedure.	Contact and service data will be used to provide reminder and follow-up work on service completion.
Tenant receiving service.	Contact data of the tenant, property details, residential and vulnerability data. Finance data, contact data and account information of the linked landlord or agent.
Company development.	We may utilise property, appliance, service and anonymised financial data to identify future markets of operation, service improvement and staff management data. We anonymise this data as much as is practical to do so.
Looking after vulnerable customers.	We may use vulnerability data to identify clients that are at risk or subject to medical conditions which could influence management decisions which may affect person(s) in a negative way. An example of which may be an elderly customer living with disability requiring heat, in this example we will use vulnerability data when prioritising engineer re-visits and part ordering processes.
Auditing work and customer experience.	All collected data may be utilised to audit engineer and service provider work inline with the policy set forth.
Pricing strategy.	We may utilise property, financial and transactional data alongside service visit reports to review costing policies and to help us ensure competitive pricing throughout the year. We will anonymise this data to remove contact and property data prior to usage in this way.
Protecting our employees.	Without discrimination we retain the right to use any collected data to protect the safety of our employees both in the field and office based.
Establishing a legal defence, law enforcement queries.	All collected data subject to the scope of the defence and request made upon the company and/or its service agents and representatives.

Our website, cookies and social media presence.

When you visit our website, a copy of this policy will always be made available.

Our aim is to ensure that our website and client interface is always working optimally for those who use them. When you visit our website and are an anonymous visitor, we will use cookies and similar technologies - in accordance with your cookie preferences - to track anonymous details such as response times, the pages you view and the functionality you use. No individual is uniquely identifiable from this data and it is used purely to enable us to constantly review and improve this service.

If you chose to complete an online application, enquiry or other form through our website then the form will set out explicitly what data is required for the form to be processed and any data submitted will be handled within the remit of this policy, we utilise a secure connection to our website which will encrypt data between the website and our own internal systems.

If you are logged in, or we can see that you were previously logged in, we will use cookies and similar technologies - in accordance with your cookie preferences - to track your use of the site or application. In this instance some data may be recorded to your record to enable us to provide the best ongoing service to you.

Our website hosting platform utilises log files to track faults, potential security weaknesses and to monitor abuse of our site. These log files will contain data that could be used to identify another computer or internet connection. We do not link this log data with our general operations data.

Cookies

We utilise cookies throughout our website for the purpose of anonymous tracking and ensuring the performance of our website. You may opt out of this functionality at anytime by disabling cookies from within your browser.

- Disabling cookies in Google Chrome
<https://support.google.com/accounts/answer/61416>
- Disabling cookies in Mozilla Firefox
<https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
- Disabling cookies in Microsoft Edge
<https://support.microsoft.com/en-gb/help/4468242/microsoft-edge-browsing-data-and-privacy-microsoft-privacy>
- Disabling cookies in Apple Safari
<https://support.apple.com/en-gb/guide/safari/sfri11471/mac>

Cookies are utilised within the “self service” area of our site are required for general functionality. We have attempted to develop as much of our service without the need for cookies, however some features will not function if cookies have been disabled within your browser.

Self service area

The self service area of our website utilises personal data, including digital footprint data to identify a user and provide interactive content. This data may be made up from several sources including cookies, computer and Internet connection information along with data held and gathered from previously authenticated sessions. Our website and in particular our self service area only utilises personal data to provide it's service. This data is not used for any other purpose than to relay it's content back to an authenticated user.

Third party websites

We maintain an online social media presence, this takes place on third party websites, applications and services where we are unable to control personal data or interaction data. We will only utilise platforms that meet our own ethical views, provide their own clearly defined privacy policy.



Managing personal data held with us.

How long we keep your personal data for:

Contact data.	2 years from date of last received/made contact.
Financial data.	Equivalent to the time taken for a transaction to be completed.
Transactional data.	6 years from date of transaction.
Property data.	5 years from date of last physical visit or 1 complete year after the expiry of a product warranty arranged by us, whichever is the longer. For example, a 7 year boiler warranty would be held on file with us for 8 years from the start date of the warranty irrespective of whether we visited the property or not in this period. If a subsequent visit was made in year 4 of the warranty, we would reset the clock to 5 years from this physical visit.
Test data.	Data linked. Stored and treated as property data.

Accessing the personal data that we hold on you:

If you would like us to disclose the personal data which we hold about you, your account and your property, please submit a request in writing to: office@n4gas.co.uk

We do not charge for compiling this data; however, you must allow us reasonable time to process this request, we aim to process all requests within a period of 2 weeks from the time of the original request. Where a subsequent request is made after an initial request within 12 months of the initial request, we reserve the right to charge an administration fee for processing any subsequent requests.

Updating personal data that we hold about you:

Please contact us to update any personal data that we hold about you. Where inaccurate information is held, we aim to update this throughout our systems within 2 working days of being notified of inaccuracies.

Deleting personal data files that we hold on you:

For legal reasons we are unable to remove all personal data from our systems without a court order. However we are happy to delete certain personal data on request. We are unable to delete transactional or property (Including test data) data until the expiry of the data as described within this statement. We are happy to remove contact data at any time, alternatively, we can move data to a non-live state where it can only be accessed by our senior management team for legal, auditing and financial monitoring reasons.



Your rights in relation to your personal data.

You may have the following rights in relation to your personal data:

- the right to be informed about the personal data we collect, how your personal data is being used, and from whom we collect your personal data when we obtain it from other sources;
- the right to access the personal data we hold about you;
- the right to request the correction of inaccurate personal data we hold about you;
- the right to request the blocking or deletion of your personal data in some circumstances;
- the right to request that we port elements of your data either to you or another service provider;
- the right to object to us processing your personal data.