

Gasway Customer Privacy Notice

Personal information

Gasway Services Limited are committed to the responsible handling and protection of your personal information.

The Data Protection Act 2018 and UK General Data Protection Regulation (GDPR) defines personal data as any information related to an individual that can be used to identify them directly or indirectly. This includes physical attributes, location data, online identifiers (including IP addresses), identification numbers, health information and economic, cultural, or social identify of a person.

We process (collect, use, store, share) personal information where necessary to provide our services and for our operational and business purposes as described in this Privacy Notice.

We want to be clear about our privacy practices so that you can make informed choices about the use of your information, and we encourage you to contact us at any time with questions or concerns.

How we use your information

This privacy notice tells you how we, Gasway Services, will collect and use your personal information to enable us to provide our services to you. The information we process can be collected directly from customers or from third-party organisations where we process information on their behalf.

Why does Gasway Services need to collect and store personal information?

Gasway processes personal information for the following purposes:-

- Servicing, repair and installation of gas appliances and heating systems
- Management and support of customer contracts
- For the welfare of our customers
- For the protection of employees, customers, contractors, and sub-contractors
- For the prevention of fraud, crime, legal proceedings, and to comply with the law
- Feedback from research and surveys on how we can provide better services
- Communication with our customers to provide updates relating to our business and services
- For the management of financial services
- For general day to day corporate operations and due diligence

We are committed to ensuring that the information we collect, and use is appropriate for these purposes and does not constitute an invasion of your privacy.

Special category personal data

Occasionally we may collect and process what is considered special category personal data (sensitive personal information).

Sensitive personal information is a subset of personal data and is defined as any information related to racial/ethnic origin, political opinions, religious beliefs, trade union membership, physical or mental health information including biometric and genetic data, or sexual life preferences.

We will only collect this information if it is necessary to support you whilst you are a Gasway Services customer.

We will only share this information if we receive your explicit consent to do so, unless for reasons of vital interest (emergency, life or death situation) or required by law.

Lawful processing

We must have a valid lawful basis to process your personal information. This ensures that the processing is necessary for the purpose we collected it for.

We process (collect, use, store, share) your personal information for the following lawful basis:-

Performance of a contract – where the processing is necessary for Gasway to deliver our side of the contract to you as an individual. This includes the following activities:-

- Processing information for the servicing, repair, or installation of heating systems
- Processing of credit and debit cards
- Processing of Direct Debits
- Processing of communication with Gasway including calls into our Customer Services Team, notes of discussions, Emails, texts, and Live Chat

Legitimate interest – We process personal information for certain legitimate interests related to the business purposes listed above. “Legitimate Interest” means in the interest of our company in conducting and in managing your contract with us. This includes:-

- Advice by phone, post, text, or email confirmation on rescheduling an appointment
- Processing of Staff Security Alert (SSA) and Do Not Visit Alone (DNVA) information to protect our employees, customers, contractors, and sub-contractors working in properties

- CCTV surveillance for the protection of property and staff at our premises
- Text or email you to complete feedback surveys after you have received a service from us and use the information you provide to improve our services
- Email or text customers with the promotion of our services
- Storing (3 months) voice recordings when you call into our Customer Services Team for complaints resolution, training, and quality purposes
- Sharing personal information, lawfully and as necessary in association with a national or global disaster such as the coronavirus
- Processing of Email address to signpost customers for feedback on Trustpilot

Legal Obligation – We process personal information for certain legal obligations. This is where the processing is necessary to comply with legislation or the law.

- Sharing personal information with the police or local authority for the prevention and detection of crime (case specific and relevant)
- Whistleblowing for the protection of staff
- Sharing CCTV images for insurance and legal purposes
- Investigating and reporting of personal data breaches in line with data protection law
- Processing of Subject Access Requests (request for personal information we hold about you) and individual rights in line with data protection law
- Overall information security and maintenance operations to prevent unauthorised access, intrusion, misuse of company systems, networks including prevention of personal data breaches and cyber-attacks (where an unauthorised third-party accesses personal data)

Consent - We process personal information at your request and where you have a choice to do so. You can opt out or withdraw your consent at any time by emailing dataprotectionteam@flagship-group.co.uk.

Administration of Live Chat – You have a choice whether to communicate with us in this way by using Live Chat on the Gasway Services website. We use Amazon Connect to handle customer enquiries in real time. If you use the Live Chat service, we will collect your name, Email address and the contents of your Live Chat session. This information is retained on encrypted servers within our own network and in cloud services. Live Chat information is stored for 1 month after which it is deleted from this platform. We may keep a record of this conversation on our servicing management system.

Vital Interest – We process personal information where it is in the vital interest of our customers.

- If we are made aware of a risk of potential gas and/or carbon monoxide issue we will pass details to the Emergency Service Provider, Cadent
- In an emergency where the individual is incapable of giving consent, we will share medical details with paramedics or other medical providers
- Any national or global disaster that may change the way we work, such as the Coronavirus.

Will Gasway share my personal information with anyone else?

We will share customer contact details with our internal tradespeople and operatives, and we may pass your personal information on to:-

- third-party service providers, external contractors, sub-contractors, and suppliers contracted to provide services on our behalf
- local authorities
- the police
- utility companies
- banks and other financial institutions to collect payments

Any third parties that we may share your information with are obliged to keep your details securely, and to use them only to fulfil the services they provide on our behalf. When they no longer need your information to fulfil this service, they will dispose of the details in line with our procedures. If we wish to pass your sensitive personal information onto a third-party, we will only do so once we have obtained your consent unless we are legally required to do otherwise. If you require further details on who we share your personal information with, please contact the dataprotectionteam@flagship-group.co.uk.

Special circumstances

To provide a duty of care to employees, customers, contractors, and sub-contractors we will process and share relevant personal information for their protection. This will be an alert on our servicing management system to visit in pairs (Staff Safety Alert).

How will Gasway use the personal information it collects about me?

Gasway will process the information you provide in a manner compatible with the Data Protection Act 2018 and UK GDPR. We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. However, we are required to retain information in accordance with the law, such as information needed for financial, legal and audit purposes. How long certain kinds of personal information should be kept may also be governed by specific business-sector requirements, agreed practices and on individual business needs.

Under what circumstances will Gasway Services contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. We may contact you to arrange visits if we receive instruction to undertake works at your property. We may sometimes contact you for feedback by doing research or asking you to take part in a survey, this enables us to make changes and improvements to our services. We may also communicate with you when we have updates or changes to our business. If you have provided us your Email and/or mobile number, we will contact you in this way to communicate. We consider this communication to be within our legitimate interest of lawful processing.

How do we secure personal information?

Gasway Services take data security seriously, and we use appropriate technologies and procedures to protect your personal information. Our information security policies and procedures are closely aligned with widely accepted standards and are reviewed regularly and updated as necessary to meet our business needs, changes in technology, and regulatory requirements.

Policies and procedures

We have measures in place to protect against accidental loss and unauthorised access, use, destruction, or disclosure of data including the following:-

- We have a Business Continuity Plan and IT Disaster Recovery procedure that is designed to safeguard the continuity of our service to our customers and to protect our people and assets
- We place appropriate restrictions on access to personal information
- We implement appropriate measures and controls, including monitoring and physical measures, to store and transfer data securely
- We conduct Data Privacy Impact Assessments in accordance with legal requirements and our business policies
- We conduct Data Protection training for all employees who have access to personal information and other sensitive data
- We take steps to ensure that our employees and contractors operate in accordance with our information security policies and procedures and any applicable contractual conditions
- We require third party contractors or sub-contractors to have appropriate agreements in place to ensure personal information is processed in line with legislation

Can I find out the personal information that Gasway holds about me?

We, at your request, will provide you with a copy of the personal information we hold about you. This is referred to as your right of access (subject access request). You are entitled to receive any information that identifies you as an individual, including the following information:-

- The lawful conditions applicable to the processing of your personal information
- If the processing is based on a legitimate interest (this is necessary for the operation of our business and you will expect your data to be used in this way)
- The categories of personal information processed
- Recipients(s) or categories of recipients that the data is/will be disclosed to
- If we intend to transfer personal information to a third country or international organisation
- How long the information will be stored
- The source of personal information if it was not collected directly from you
- Any details and information associated to automated decision making or profiling

Your rights as a data subject (customers of Gasway Services)

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- **Right of Access** – at your request we will provide you with a copy of the personal data we hold about you. This is referred to as your right of access (subject access request). You are entitled to receive any information that identifies you as an individual.
- **Right of rectification** – you have a right to ask us to update personal information if you have a reason to believe that it is inaccurate or incomplete.
- **Right to be forgotten** – you have the right in certain circumstances to ask for the data we hold about you to be erased from our records. Especially if you think we are processing your personal information where it is no longer necessary or where you believe it is unlawful.
- **Right to restriction of processing** – You have the right to ask us to temporarily stop processing your personal information if you have concerns over the accuracy of the information in some way.
- **Right of portability** – you have the right to have the data we hold about you transferred to another organisation.
- **Right to object** – you have the right to object to the way we process your personal information if you consider Gasway are being unlawful.
- **Right to object to automated decision making, including profiling** – you have the right to object to decisions made about you from automated processing/profiling.

Privacy Notice changes

We will regularly review and make necessary changes to the services and information handling processes when you, the law, or the Information Commissioners Office (ICO) request such changes.

We process (collect, use, store, share) personal information where necessary to provide our services and for our operational and business purposes as described in this and future Privacy Notices.

This privacy notice was last updated on 31/01/2024

How to contact us?

If you would like to make a request to obtain the personal information we hold about you or access any of your rights as explained in this privacy notice you can do so in the following ways:-

Write to us at:-

Data Protection Officer
Flagship Group
31 King Street
Norwich
NR1 1PD

Email – Data Protection Officer DataProtectionTeam@flagship-group.co.uk

Phone – 0800 074 3030

If you have any concerns regarding how Gasway Services has handled your rights request, you have the right to complain to the Information Commissioner's Office (ICO) at:-

Information Commissioner's Office
Wycliffe House
Water Lane Wilmslow Cheshire
SK9 5AF

Tel : 0303 123 1113