



## Privacy Notice

This privacy notice is issued by Confederation Holdings Limited (collectively referred to as “we”; “us” and our”) and relates to our use of any personal data concerning you, (referred to as “data”) collected by us where you are either:

- (a) A user of any websites operated by us, or by our subsidiary companies; or
- (b) A person who speaks to us, or our subsidiary companies, by telephone; or
- (c) A member of the Confederation.

If you engage our services, or the services of our subsidiaries -and if this engagement changes how we will use your data- you will be provided with a further privacy notice as appropriate.

We shall respect your privacy rights and your rights as a data subject. We will manage and protect your data accordingly whilst it is in our hands in accordance with all applicable data protection legislation and in accordance with this notice.

### Who is the Data Controller?

We are registered with the Information Commissioner’s Office, as a data controller, under the registration number of ZA001122. We can be contacted at the following address:

*Confederation Holdings Limited  
4 Forbes Drive  
Ayr  
KA8 9FG*

*Tel: 0151 258 6397*

### Who is the Data Protection Officer?

We have appointed a Data Protection Officer, who is the point of contact for enquiries relating to how your data is processed. The Data Protection Officer can be contacted at the following address:

*Blair Houston  
Kinnell Holdings Limited  
4 Forbes Drive  
Ayr  
KA8 9FG*

*Email: [blair.houston@qanw.co.uk](mailto:blair.houston@qanw.co.uk)*



## On What Basis Do We Process Your Data?

We shall process your data lawfully in accordance with the legitimate basis for data processing set out in Article 6 of the General Data Protection Regulation. The legal basis for processing your data are as follows:

- In the course of your visit to our websites; processing your data is necessary for the pursuit of our legitimate interests (providing that these interests are not overridden by your own rights and interests). This shall be the default basis of processing your data unless we inform you otherwise.
- In our recording of telephone conversations; processing your data is necessary for the pursuit of our legitimate interests (providing that these interests are not overridden by your own rights and interests). This shall be the default basis of processing your data unless we inform you otherwise.
- For certain processing operations; we shall process your data on the basis of your positive, explicit, informed consent. Where we intend to use consent as a processing basis, you will be informed of this separately, in advance; you will be notified -in granular detail- as to why we would seek your consent; and you will have the opportunity to freely give your consent if you so wish.
- Where you are a sole trader who is a member of a tradesman scheme operated by us, we shall process your personal data in order to fulfil the membership contract existing between you and us.

## How Did We Receive Your Data?

The data we process will have been provided by you, during your visits to the websites, or your conversations with us by telephone, or by the content of your application form.

We did not receive your data from any publicly available source.

## What Types of Data Do We Process?

We shall in the normal course of business process the following types of data:

- Your internet protocol address (“IP address”). This is an identifiable label assigned to a device connected to a computer network. We will collect this during your visit to the site for analytics purposes to identify unique visits to the site.
- Your contact details. We will collect these if you choose to contact us using any of the forms on the site. This is so that we may respond to your queries.
- If you make use of any live chat facility, we shall collect any personal information that you enter into that facility. This is so that we may respond to your queries.
- If you speak with us via telephone, we may collect any personal information that you provide via telephone. This is so that we may respond to your queries; and so that our interactions with you may be audited for compliance and quality purposes.
- If you enter into a contract with us or one of our subsidiaries (for example, if you become a registered member) which requires further processing of personal data, you will be given a further privacy notice keeping you updated on the nature of that processing.

We will not -in the normal course of business- process “special categories” of personal data. Exceptionally, we shall only process these categories of personal data where we have separately obtained your positive, explicit, informed consent; unless your consent is not required by law, or the information is necessary to protect your health. The special categories of personal data are as follows:

- Racial or ethnic origin.
- Political opinions.
- Religious and philosophical beliefs.

- Trade union membership.
- Biometric data.
- Sexual orientation.
- Health data.

## **Will Third Parties Receive Your Data? What Are Their Interests?**

As a member of a group of companies; we may pass your data to our subsidiaries for administration purposes. These subsidiaries are as follows:

- Warranty Services Limited (trading as QANW)
- Guarantee Protection Insurance Limited
- Kinnell Holdings Limited
- The Remedial Company Limited
- Kinnell Corporate Limited

In order to provide members with access to membership benefits and services, we may transfer your personal data to and Repton Partnerships. We will only do this if you are a registered member.

Your data will not be transmitted to organisations outside of the European Union.

## **How Long Will We Keep Your Data?**

Your data will be retained only for as long as is necessary.

Where we collect your IP address, this is kept by us for three months and then deleted.

Where we collect personal data from you via any live chat facility, this shall be kept for us for three months and then deleted; unless the information relates to an ongoing claim; a legal matter; or a regulatory matter, in which case, the data shall be kept for a period where the retention of such data shall be necessary.

Any telephone call recordings are kept for a period of 10 years and then deleted; unless they are required for us to defend against legal claims.

Personal data provided on application forms is kept for the duration of that member's membership with us and deleted 6 years after termination of that membership.

## **What Are Cookies And How Do We Use Them?**

Cookies are small files placed on your computer by your internet browser when you visit a website. A cookie stores information in order that if you visit the website, the unique state of your visit is known. Most internet browsers include the functionality to disable cookies for some or all websites; although in doing so, some features of the website may not work correctly. For instructions on how to disable cookies, or set our cookie preferences, please check the link below for your relevant web browser:

- [Mozilla Firefox](#)
- [Google Chrome](#)
- [Microsoft Internet Explorer and Microsoft Edge](#)
- [Opera](#)

Cookies are used for analytic purposes. In particular, we use Google Analytics. Further details can be found on the Google Analytics website:

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>

## What Are Your Rights to the Data?

### *Right of Subject Access*

You can request details of all data we hold about you by submitting a subject access request to the Data Protection Officer, at the address provided above.

We aim to comply with such a request from you within one month of the request being made. Where we cannot provide you with this information within one month; we shall inform you of this and provide the reasons why this cannot be achieved; at which point, we shall have a total of 3 months to comply with this request.

In the normal course of business, we shall not charge a fee for a subject access request. However, in the event that you make a subject access request that is of a manifestly unfounded, repetitive or excessive nature, we reserve the right to charge a fee of £10 per request.

### *Right of Rectification*

In the event that your data is incorrect; you have the right to have this rectified by us. In the event that any of your data is incorrect, please contact the Data Protection Officer at the address provided above. We shall not charge a fee for your data to be rectified.

### *Right of Objection*

You have the right to object to our processing of your data. Please note, that where we require to continue to process your data for reasons such as the defence of claims, we shall not be required to cease processing your data. In the event that you wish to object to us processing your data, please contact the Data Protection Officer at the address provided above.

### *Right of Erasure*

You have the right to request that we delete your data provided that; we no longer require your data; or there is no legitimate legal basis for us to process your data; or we have unlawfully processed your data; or the data must be erased in order to comply with the law.

If you have grounds to request that we delete your data -and you wish to do so- please contact the Data Protection Officer at the address provided above. We shall not charge a fee for your data to be deleted from our databases.

### *Right of Data Portability*

You have the right to request that we provide you a copy of your data in a machine-readable format, for the purposes of transferring your data from us to another data controller.

## Can a Complaint Be Made?

If you have any complaints about how we process your data; please contact the Data Protection Officer, at the address provided above.

In the event that we are unable to resolve your complaint: You have the right to make a complaint to the Information Commissioner's Office if you believe that your information has been mishandled by us.

The Information Commissioner's Office can be contacted as follows:

*Information Commissioner's Office*

*Wycliffe House*

*Water Lane*

*Wilmslow*

*Cheshire*

*SK9 5AF*

*Tel: 0303 123 1113*