



## **PRIVACY POLICY**

### **Introduction**

This Privacy Policy specifies how DG Lloyd Architectural Services collects, uses, and stores your personal data obtained when you use our services or visit our website, or otherwise obtained by us from you. Our aim is that this Privacy Policy be clear, legible and understandable for our clients and website visitors.

At DG Lloyd Architectural Services we take your privacy very seriously and are committed to protecting your personal data. We do not collect any personal data from individuals without their knowledge, and we take every precaution to protect the personal data provided by our clients and website visitors. Any personal data provided to us will only be used in direct relation to a particular project or enquiry.

By using our services or by visiting our website, you are accepting and consenting to the practices described in this notice and agree to be bound by this Privacy Policy. Contacting us (e.g. via phone, SMS, post, email, website contact form, social media message and/or post, in-person meeting) is considered your consent for us to process the data that you send or provide to us in accordance with this Privacy Policy.

The processing of personal data by DG Lloyd Architectural Services shall always be in line with the EU General Data Protection Regulation (GDPR), and in accordance with country-specific data protection regulations applicable.

### **Contents**

1. Definitions
2. Collection of Data
  - i. What Data We Collect
  - ii. Why We Collect Data
  - iii. How We Collect Data
3. Storage Period of Data
  - i. How Long We Store Personal Data
  - ii. Erasure of Personal Data
4. Where Data is Stored
5. How We Secure Your Personal Data
6. Rights of the Data Subject
  - i. Right of Confirmation
  - ii. Right of Access
  - iii. Right to Rectification
  - iv. Right to be Forgotten (Erasure)
  - v. Right to Data Portability
  - vi. Right to Restrict Processing
  - vii. Right to Object
  - viii. Right to Withdraw Consent
  - ix. Right to Lodge a Complaint
7. Lawful Basis for Processing
8. Statutory or Contractual Requirement to Provide Personal Data
9. Your Duty to Inform Us of Changes
10. Consequences of Not Providing Personal Data
11. Automated Decision-making and Profiling
12. Cookies
13. External Links
14. Third Party Sharing
15. Downloads
16. Under Age 16
17. Marketing
18. Social Media
19. Changes to our Privacy Policy
20. Proprietor & Data Controller

## 1. Definitions

To help you understand this Privacy Policy, please find below a list of terminology used:

**GDPR** refers to the EU General Data Protection Regulation. The GDPR supersedes the UK Data Protection Act 1998 (DPA) on 25 May 2018.

**Personal Data** means any information relating to a 'Data Subject' (such as a client or website user) who can be identified, via an identifier (e.g. name, address, email, contact telephone number, identification number, etc.).

**Data Subject** is any identified or identifiable person (e.g. client or website user), whose personal data is processed by the Data Controller.

**Data Controller** is the person or organisation that determines the purposes and means of the processing of personal data.

**Data Processor** is the person or organisation that processes personal data on behalf of the Data Controller.

**Data Processing** is any operation that is performed on personal data via automated systems or non-automated systems. The GDPR lists the following as examples of data processing: collection, use, recording, organisation, storage, structuring, retrieval, adaptation or alteration, consultation, disclosure by transmission, dissemination or otherwise making available, aligning or combining, restricting, erasure or destruction.

**Third Party** is a person, organisation, agency or body other than the Data Subject, Data Controller, and Data Processor.

**Consent** is any freely given, specific, informed and unambiguous indication of the Data Subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

## 2. Collection of Data

### i. What Data We Collect:

Personal data may include name, address, phone number(s), email address, and relevant information pertaining to a project (e.g. architectural drawings, photos/images, etc.). We do not collect sensitive data for billing purposes (see 5. *How We Secure Your Personal Data – Sensitive Data*).

Written feedback provided to us by clients may be displayed on our website as a testimonial (first name only and location (city or county) is shown so that the client cannot be identified). Feedback from business clients will also show the business name and logo.

Photographs of projects may be displayed on our website to showcase our work. Photographs supplied by clients may be displayed on our website with the client's permission. Photographs that we have taken may be displayed on our website provided that the client cannot be identified and their privacy is not compromised.

The details of other relevant businesses (e.g. name, type, location, phone number(s), email, website, logo) specifically requested by each individual business to appear on our website's Links Page.

### ii. Why We Collect Data:

Personal data is collected and stored for the following purposes:

- Contacting a Data Subject when he/she has made an enquiry.
- Executing and completing a project commissioned by the Data Subject.
- Maintaining our own accounts and records.
- Providing external links on our website's links page requested by relevant businesses.
- Providing feedback and/or photographs on our website supplied by our clients to showcase our work.

iii. How We Collect Data:

DG Lloyd Architectural Services collects personal data from a Data Subject which has been voluntarily sent or provided via phone, SMS, post, email, website contact form, social media message and/or post, or in-person meeting.

Browsing our website is possible without any indication of your personal data, however processing of your personal data is necessary if you contact us via our website through our contact form or link to our email.

Email data is stored on our computer in our email account and is deleted when it is no longer required. Internet-based data transmissions may in principle have security gaps, therefore absolute protection cannot be guaranteed. For this reason, if you have any concerns, please feel free to transfer personal data to us using alternative methods such as via phone or post.

Contacting us via social media and messaging services such as Facebook and Messenger.

We may receive information about you from third parties. This would usually occur when you have given them your permission to share your information with us (e.g. referrals from your family/friends, other businesses).

**3. Storage Period of Data**

The personal data of the Data Subject is processed and stored for the period necessary to achieve the purpose of storage (e.g. responding to enquiries, the implementation and duration of a project).

i. How Long We Store Personal Data:

Personal data pertaining to a project is retained for a period of 5 years after the completion of the project.

Personal data pertaining to enquiries is retained until the enquiry has been dealt with and finalised.

Personal data pertaining to external links on our website is retained indefinitely and deleted when requested by the individual business.

Personal data pertaining to client feedback and/or photographs on our website is retained indefinitely and deleted if no longer required by us, or when requested by the Data Subject.

Personal data that is indicated on our invoices (e.g. name, address, phone number(s), email) is retained indefinitely (and a minimum of 6 years as required under UK tax law for accounts/tax purposes).

If the Data Subject wishes to have their data retained for a longer period of time, or erased prior to the period(s) outlined above (see Section 6 iv Right to Be Forgotten (Erasure)), they must make a request in writing or via email to the Data Controller.

ii. Erasure of Personal Data:

After the retention period has expired, and provided that no request has been made by the Data Subject to retain the data for a longer period of time, the personal data is erased.

**4. Where Data is Stored:**

Data is stored on our computer and in physical form as follows:

- All inquiries are stored on our computer in our email account and/or physical enquiry folder.
- The personal data for each individual client and their respective project data are stored in 2 folders, 1 folder on our computer and/or in a physical folder.

## 5. How We Secure Your Personal Data

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the data that we collect from clients.

Your personal data will only be accessed by the person(s) who requires it for the purpose(s) it is intended (this is, in most instances, only the Data Controller).

Non-sensitive Data: Non-sensitive data is sent normally over the internet (e.g. email). Despite all our precautions, no data transmission over the internet can be guaranteed to be 100% secure. While we make every effort to protect your personal data, we cannot guarantee the security of any information you disclose to us online, and you must understand that you do so at your own risk. Once your data has been received by us, our best effort is made in taking every precaution to ensure that your data is secure.

Sensitive Data: All invoices are paid by cheque. We do not retain any bank details and the cheque is only in our possession until it is deposited into our account.

## 6. Rights of the Data Subject

**i) Right of Confirmation:** A Data Subject has the right to obtain from the Data Controller confirmation as to whether or not personal data concerning him/her is being processed.

**ii) Right of Access:** A Data Subject has the right to receive free information about his/her stored personal data at any time, including a copy of this information in a structured, commonly used format.

As a security precaution, we will require proof of identity from you to ensure that any personal data that we provide is not disclosed to a person who does not have the right to receive it. This will be in the form of 2 pieces of identification, 1 of which must be photographic (i.e. driving license, bus pass, valid Passport). If the Data Subject does not have photographic identification, a Birth Certificate copy or National Insurance Card copy will be accepted, accompanied with a passport size photo that is countersigned on the back by someone who can confirm your identity. The Data Controller has the right to refuse or charge for requests that are manifestly unfounded or excessive (£10 per request). A Data Subject has access to the following information:

- Purpose for the processing of personal data.
- Types of personal data concerning him/her that was provided to a Data Controller.
- Recipients to whom personal data has been or will be disclosed (if applicable).
- Predicted period that personal data will be stored, (if this is not possible, the measures used to determine the storage period).

**iii) Right to Rectification:** A Data Subject has the right to request from the Data Controller the rectification of inaccurate personal data concerning him/her, and the right to have incomplete personal data completed.

**iv) Right to be Forgotten (Erasure):** A Data Subject has the right to request the erasure of their personal data. The Data Controller must erase the Data Subject's personal data without undue delay, as long as the processing is not necessary, and where one of the following grounds applies:

- The personal data is no longer relevant to the purposes for which it was collected and/or processed.
- The Data Subject withdraws consent for their data to be used, and where the organisation has no other legal ground for collecting it.
- The data has been unlawfully processed.
- The data's erasure is necessary for compliance with a legal obligation to which the Data Controller is subject.
- The Data Subject objects to their data being collected for marketing purposes or where their rights override legitimate interests in collecting data.

In all the above cases, the data must be deleted without undue delay and within 1 month of the request being made.

DG Lloyd Architectural Services does not have to honour these requests if they are complying with legal obligations; exercising their right to freedom of expression or the right to freedom of information; if the data is in the public interest; or to establish, exercise or defence legal claims.

**v) Right to Data Portability:** In exercising his/her right to data portability, the Data Subject has the right to have personal data transmitted directly from one Data Controller to another (if technically feasible), and when doing so does not adversely affect the rights and freedoms of others.

**vi) Right to Restrict Processing:** A Data Subject has the right to obtain from the Data Controller restriction of processing where one of the following applies:

- The accuracy of personal data is contested by the Data Subject, for a period enabling the Data Controller to verify the accuracy of the personal data.
- The processing is unlawful and the Data Subject opposes the erasure of the personal data and requests instead the restriction of its use.
- The Data Controller no longer needs the personal data for purposes, but the data is required by the Data Subject for the establishment, exercise, or defence of legal claims.
- The Data Subject has objected to the data processing pending verification as to whether the legitimate grounds of the Data Controller override those of the Data Subject.

**vii) Right to Object:** A Data Subject has the right to object at any time, to the processing of his/her personal data. If an objection is made, the Data Controller will cease to process the personal data, unless legitimate grounds can be shown for such processing that overrides the interests, rights and freedoms of the Data Subject, or for the establishment, exercise or defence of legal claims.

**viii) Right to Withdraw Consent:** A Data Subject has the right to withdraw his/her consent to the processing of his/her personal data at any time. If the Data Subject wishes to exercise his/her right to withdraw consent, he/she can contact SC Lloyd Designs directly.

**ix) Right to Lodge a Complaint:** A Data Subject has the right to lodge a complaint if they feel that their personal data has not been processed according to the GDPR guidelines. If a Data Subject wishes to lodge a complaint, he/she should proceed as follows:

- i. In the first instance, to exercise all relevant rights, queries or complaints, please contact the Data Controller via email at [dglloyd.as@googlemail.com](mailto:dglloyd.as@googlemail.com) or by telephone at 07940 023626, or write to us at DG Lloyd Architectural Services, 16 Llain Drigarn, Crymych, Pembrokeshire, SA41 3RF.
- ii. If this does not resolve your complaint to your satisfaction, you have the right to make a complaint with the relevant supervisory authority, which in the UK is the Information Commissioner's Office. They can be contacted online at <https://ico.org.uk/concerns/handling>, or email via <https://ico.org.uk/global/contact-us/email>, or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.

## **7. Lawful Basis for Processing**

Our lawful basis for processing your personal data under the EU General Data Protection Regulation (GDPR) is as follows:

- The processing of personal data is necessary for the fulfilment of a contract between us and the Data Subject (e.g. provide architectural services to the Data Subject).
- The processing of personal data is necessary to carry out pre-contractual measures (e.g. inquiries concerning our services).
- The processing of personal data is necessary when we are subject to a legal obligation to do so (e.g. for the fulfilment of accounting and tax obligations or for the establishment, exercise, or defence of legal claims).

## **8. Statutory or Contractual Requirement to Provide Personal Data**

The provision of personal data can result from a statutory requirement (e.g. as required by law such as invoices for tax purposes), or a contractual requirement (e.g. information on a contract and/or project).

## **9. Your Duty to Inform Us of Changes**

It is important that any personal data that you have provided to us is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## **10. Consequences of Not Providing Personal Data**

If the required personal data is not provided by the Data Subject to enter into a contract and/or complete a project, then the contract and/or project will be cancelled and any personal data pertaining to the Data Subject that has been obtained will be deleted.

## **11. Automated Decision-making and Profiling**

DG Lloyd Architectural Services does not use automated decision-making or profiling.

What is Automated Decision-making? As defined by the GDPR, automated decision-making is making a decision solely by automated means without any human involvement.

What is Profiling? As defined by the GDPR, profiling is the automated processing of personal data to evaluate certain things about an individual (profiling can be part of an automated decision-making process).

## **12. Cookies**

The website of DG Lloyd Architectural Services does not use Cookies.

DG Lloyd Architectural Services does provide links to other websites that may use cookies, therefore it is important to note that once you have left our website, we take no responsibility regarding your security, protection and privacy on such websites, and such sites are not governed by this Privacy Policy. You should exercise caution and check the Privacy/Cookie Policy applicable to the website in question.

What Are Cookies? Cookies are small text files that are placed on your computer, mobile phone or other device when you visit websites. Cookies enhance your browsing experience and analyse your interaction with the websites that you browse allowing web applications to respond to you as an individual. Cookies can identify nothing about you. Some cookies are deleted from your computer or mobile device when you close your browser, and other cookies stay on your computer or mobile device until they expire or are deleted. You can modify your browser settings to decline cookies if you prefer, and websites that use cookies should have a notice to accept cookies when you first visit their website. For more information visit [www.aboutcookies.org.uk](http://www.aboutcookies.org.uk) or [www.allaboutcookies.org](http://www.allaboutcookies.org) (please note that these are external websites and DG Lloyd Architectural Services is not responsible for the accuracy of information on these sites).

## **13. External Links**

Our website may contain links to other websites of which DG Lloyd Architectural Services does not have any control over. DG Lloyd Architectural Services makes every effort to include relevant, quality, and safe external links of interest to our website visitors, however users should be advised that if they click on external links, they do so at their own risk. Once a link(s) has been followed to another website and the user has left our site, DG Lloyd Architectural Services cannot be held responsible for your security, protection and privacy, or any damages or implications on such websites, and such sites are not governed by this Privacy Policy. You should exercise caution and check the Privacy Policy applicable to the website in question.

If you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site, as this website is only governed by this Privacy Policy.

## **14. Third Party Sharing**

The personal data of our clients (Data Subjects) is strictly confidential and will never be shared or transferred to third parties by DG Lloyd Architectural Services.

## **15. Downloads**

Any downloadable documents or files made available on this website are provided to users at their own risk. All precautions have been undertaken to ensure that only genuine downloads are available. We accept no responsibility for downloads provided by external third party websites and advise users to verify their authenticity using anti-virus software or similar applications.

## **16. Under Age 16**

We do not collect information from children under the age of 16.

## **17. Marketing**

DG Lloyd Architectural Services will never contact you for marketing purposes.

Photographs of completed projects may be featured on our website or advertising material (e.g. pamphlets, flyers, wedding fair/exhibition displays) in order to showcase our work, however personal data will always be either hidden or not legible.

DG Lloyd Architectural Services will never share your information with third parties for marketing purposes.

## **18. Social Media & Internet-based Advertising**

We may have official profiles on social media platforms solely to have a social media presence and not for the purpose of collecting personal data or internet-based advertising. If you engage or communicate via social media sites that DG Lloyd Architectural Services and this website use, we cannot be held responsible for your security, protection and privacy on such websites, and such sites are not governed by this Privacy Policy. The social media sites that you visit are subject to the privacy policy and terms and conditions of each individual site and you should review the respective policies of the site(s) that you visit. This website does not engage in internet-based advertising and hosts no adverts or sponsored links.

## **19. Changes to our Privacy Policy**

We regularly review, and when necessary, update our Privacy Policy to ensure that it is always in line with GDPR guidelines, and in accordance with applicable country-specific data protection regulations.

## **20. Proprietor & Data Controller**

DG Lloyd Architectural Services  
16 Llain Drigarn  
Crymych, Pembrokeshire  
SA41 3RF  
United Kingdom  
**phone:** 07940 023626  
**email:** [dglloyd.as@googlemail.com](mailto:dglloyd.as@googlemail.com)  
**website:** [www.dglloydarchitecturalservices.co.uk](http://www.dglloydarchitecturalservices.co.uk)

**IF YOU HAVE ANY QUESTIONS ABOUT THIS PRIVACY POLICY OR DATA THAT WE HOLD ABOUT YOU,  
PLEASE CONTACT THE DATA CONTROLLER.**