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## PRIVACY POLICY

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### BACKGROUND:

CJ Hepton understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, [www.cjhepton.co.uk](http://www.cjhepton.co.uk) Our Site, and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it.

#### 1. Information About us

Our Site is owned and operated by CJ Hepton, a Sole Trader.

Main trading address: 23 Queens Parade, Cleethorpes, DN35 0DF

Data Protection Representative: C J Hepton

Email address: [craig@cjhepton.co.uk](mailto:craig@cjhepton.co.uk)

Telephone number: 01472 476082.

Postal address: 23 Queens Parade, Cleethorpes, DN35 0DF

#### 2. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

#### 3. What Is Personal Data?

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

#### 4. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but

you can always contact us to find out more or to ask any questions using the details in Part 12.

- b) The right to access the personal data we hold about you. Part 11 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 12 to find out more.
- d) The right to be forgotten, i.e. the right to ask **us** to delete or otherwise dispose of any of your personal data that we hold. Please contact **us** using the details in Part 12 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask **us** for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 12.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 12.

## 5. What Data Do You Collect and How?

Depending upon your use of Our Site, we may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. We do not collect any 'special category' or 'sensitive' personal data OR personal data relating to children OR data relating to criminal convictions and/or offences.

Data Collected	How we Collect the Data
Name, title, Date of Birth, Gender	Phone, e-mail, web enquiry, text, social media, document completion, Transport Manager management software such as analysis software
Address, Email Address, Telephone numbers	Phone, e-mail, web enquiry, text, social media, document completion, Transport Manager management software such as analysis software
Business information including business name, job title, profession	Phone, e-mail, web enquiry, text, social media, document completion, Transport Manager management software such as analysis software, companies house, web searches
Passport number, National Insurance Number, Drivers Licence Number	Phone, e-mail, web enquiry, text, social media, document completion, Transport Manager management software such as analysis software, licence check bureaus/gov.co.uk
Drivers hours and working time?	Transport Manager management software such as analysis software, licence check bureaus/gov.co.uk

## 6. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we will use your personal data, and our lawful bases for doing so:

What we Do	What Data we Use	Our Lawful Basis
Registering you on Our Site.	Name, Title, Date of Birth, Gender	Legitimate interests, Consent – Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract.
Administering Our Site.	Name, Title, Date of Birth, Gender	Legitimate interests, Consent - Website management – to keep records of people we work with and wish to communicate with about our work, the support we offer clients.

Administering our business.	Name, Title, Date of Birth, Gender, Address, Email Address, Telephone numbers	Legitimate interest, Administration – we have a contract with the individual/s and we need to process your personal data to comply with our / your obligations under the contract.
Supplying our products and services to you.	Name, Title, Date of Birth, Gender, Address, Email Address, Telephone numbers	Legitimate interest, we have a contract with individual/s and we need to process your personal data so that we can comply with specific counter-obligations under the contract (eg we are processing payment details).
Managing payments for our products and services.	Name, Title, Date of Birth, Gender, Address, Email Address, Telephone numbers	Legal Interests, the processing is necessary to comply for processing your personal data.
Personalising and tailoring our products and services for you.	Name, Title, Date of Birth, Gender, Address, Email Address.	Legitimate interests, Consent – Processing for the performance of a contract with the data subject.
Communicating with you.	Name, Title, Date of Birth, Gender, Address, Email Address.	Legitimate interests - Consent, sending you emails about our services or you sign up
Supplying you with information by email and / or post that you have opted-in-to (you may opt-out at any time by sending an email to us.	Name, Title, Date of Birth, Gender, Address, Email Address.	Legitimate interests - Consent, sending you emails about our services or you sign up
Drivers hours and working time, Licence checks	Name, Title, Date of Birth, Gender, Address, Email, Tachograph records in general.	Legal Obligation - see Understanding <a href="#">EU drivers'</a> hours and working time rules.

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email OR telephone OR text message OR post with information, news, and offers on our products OR services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic

Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 12.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

## 7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long we Keep It
Identity Information including name, title, date of birth, gender.	Five years.
Contact information including address, email address, telephone number.	Five years.
Business information including business name, job title, profession.	Legal documents are kept for six years, as this is the primary limitation period under the Limitations Act 1980.
Payment information including card details, bank account numbers.	Retention period for HRMC Records is six years plus the current year.
Profile information including preferences and interests, username and password, purchase history.	Five years.
Technical information including IP address, browser type and version, operating system.	Five years.
HGV Drivers tachograph and Working Time Records.	European Driver's Hours and tachograph regulations require fleet operator's tachograph records to be kept for a year.

Working Time Records.	Working Time Directive rules require the records to be kept for up to two years.
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**8. How and Where Do You Store or Transfer My Personal Data?**

We will store some of your personal data in the UK. This means that it will be fully protected under the Data Protection Legislation.

OR

We will only store or transfer personal data in or to countries that are deemed to provide an adequate level of protection for personal data. For further information about adequacy decisions and adequacy regulations, please refer to the Information Commissioner’s Office.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner’s Office where we are legally required to do so;
- Preparing for a personal data breach
  - o We know how to recognise a personal data breach.
  - o We understand that a personal data breach isn’t only about loss or theft of personal data.
  - o We have prepared a response plan for addressing any personal data breaches that occur.
  - o We have allocated responsibility for managing breaches to a dedicated person or team.
  - o Our staff know how to escalate a security incident to the appropriate person or team in our organisation to determine whether a breach has occurred.
- Responding to a personal data breach
  - o We have in place a process to assess the likely risk to individuals as a result of a breach.
  - o We have a process to inform affected individuals about a breach when their rights and freedoms are at high risk.
  - o We know we must inform affected individuals without undue delay.
  - o We know who is the relevant supervisory authority for our processing activities.
  - o We have a process to notify the ICO of a breach within 72 hours of becoming aware of it, even if we do not have all the details yet.
  - o We know what information we must give the ICO about a breach.

- o We know what information about a breach we must provide to individuals, and that we should provide advice to help them protect themselves from its effects.
- o We document all breaches, even if they don't all need to be reported.

**9. Do You Share My Personal Data?**

We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

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**10. Can I Withhold Information?**

You may access certain areas of Our Site without providing any personal data at all.

**11. How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 12. There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover [our] OR [my] administrative costs in responding.

We will respond to your subject access request within two weeks and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

**12. How Do I Contact You?**

To contact us about anything to do with your personal data and data protection,



including to make a subject access request, please use the following details for the attention of CJ Hepton:

Email address: enquiries@cjhepton.co.uk.

Telephone number: 01472 476082.

Postal Address: 23 Queens Parade, Cleethorpes, DN35 0DF

### 13. **Changes to this Privacy Policy**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. we recommend that you check this page regularly to keep up-to-date. This Privacy Policy was last updated on 17 June 2021