




Modest Ltd

(Trading As Modest Property Services)

Privacy Policy

 07956149723

 Info@Modest.Ltd

 Modest.Limited

 Modest.Ltd

Registered Office: Modest Ltd, Dorset Crescent, Newport, NP194QF. Registered in England and Wales: 14788179



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(Trading as Modest Property Services)

Privacy Policy

1. Introduction

This privacy policy explains how Modest Ltd ("we", "us", or "our"), as the data controller, collects, uses, stores, and protects your personal data when you purchase our plumbing products or services, request information from us, or otherwise interact with us. We are committed to protecting your privacy and ensuring the security of your personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

2. Who We Are

Modest Ltd (14788179)

Matt@Modest.Ltd

3. The Personal Data We Collect

We may collect, use, store, and transfer different kinds of personal data about you, including:

- **Identity Data:** Includes your name, title, marital status, date of birth, gender.
- **Contact Data:** Includes your billing address, delivery address, email address, and telephone numbers.
- **Financial Data:** Includes your bank account and payment card details (although we may use third-party payment processors who handle this securely).
- **Transaction Data:** Includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data:** Includes internet protocol (IP) addresses, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website (if applicable).
- **Profile Data:** Includes your username and password (if you create an account with us), purchases or orders made by you, your interests, preferences, feedback, and survey responses.
- **Usage Data:** Includes information about how you use our website, products, and services.
- **Marketing and Communications Data:** Includes your preferences in receiving marketing from us and our third parties and your communication preferences.

4. How Your Personal Data is Collected

We collect your personal data through various means, including:

- **Direct Interactions:** You may give us your Identity, Contact, and Financial Data when you:
 - Purchase our products or services.
 - Request a quotation.
 - Make an enquiry.
 - Give us feedback or contact us.
- **Third Parties:** We may receive personal data about you from various third parties such as:
 - Payment processing services.
 - Credit reference agencies (where necessary for credit checks).
 - Publicly available sources.

5. How We Use Your Personal Data and the Lawful Basis for Processing

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where it is necessary for the performance of a contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Where you have given your consent (for specific processing activities like marketing).

We use your personal data for the following purposes:

- **To register you as a new customer:** (Lawful basis: Performance of a contract)
- **To process and deliver your order for plumbing products or services:** (Lawful basis: Performance of a contract)
- **To manage our relationship with you, including communicating with you about your orders, enquiries, or appointments:** (Lawful basis: Performance of a contract, Legitimate interests (to provide good customer service))
- **To manage payments, fees, and charges:** (Lawful basis: Performance of a contract, Legal obligation (for accounting purposes))
- **To collect and recover money owed to us:** (Lawful basis: Legitimate interests (to recover debts due to us))
- **To improve our products/services, marketing, or customer relationships:** (Lawful basis: Legitimate interests (to improve our business))

- **To recommend products or services which may be of interest to you (where you have consented or based on our legitimate interests):** (Lawful basis: Consent (where required), Legitimate interests (to market relevant products and services))
- **To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting, and hosting of data):** (Lawful basis: Legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise))
- **To comply with legal and regulatory obligations:** (Lawful basis: Legal obligation)

6. How We Share Your Personal Data

We may share your personal data with the following categories of external third parties for the purposes set out above:

- **Relevant Suppliers:** To facilitate the supply of specific plumbing products or services you have requested.
- **Payment Processors:** Securely process your payments.
- **Subcontractors:** Plumbers or other service providers who assist us in delivering our services to you.
- **IT and System Administration Service Providers:** Who provide support for our IT systems.
- **Professional Advisers:** Including lawyers, bankers, auditors, and insurers who provide consultancy, banking, legal, insurance, and accounting services.
- **HM Revenue & Customs, regulators, and other authorities:** Who require reporting of processing activities in certain circumstances.
- **Marketing service providers:** Who assist us with our marketing activities (only where you have provided consent).

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

7. International Transfers

We will store and process your personal data inside the UK only. We do not currently transfer your personal data outside the UK. If this changes in the future, we will update this privacy policy and ensure appropriate safeguards are in place.

8. Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal data to those employees,

agents, contractors, and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. Data Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data, and whether we can achieve those purposes through other means, and the applicable legal requirements.

Typically, we will retain customer data for up to 7 years for accounting and tax purposes following the completion of services. We may retain certain data for longer periods if required by law or for legitimate business reasons (e.g., in the event of a dispute).

10. Your Legal Rights

Under data protection laws, you have rights in relation to your personal data. These rights include:

- **The right to be informed:** You have the right to receive clear and comprehensive information about how we process your personal data (which is what this privacy policy aims to do).
- **The right of access:** You have the right to request a copy of the personal data we hold about you. This is known as a "subject access request".
- **The right to rectification:** You have the right to request that any inaccurate or incomplete personal data we hold about you is corrected.
- **The right to erasure ("the right to be forgotten"):** In certain circumstances, you can ask us to delete or remove your personal data where there is no good reason for us to continue to process it.
- **The right to restrict processing:** In certain circumstances, you can ask us to suspend the processing of your personal data.
- **The right to data portability:** In certain circumstances, you can request to receive the personal data you have provided to us in a structured, commonly used, and machine-readable format and have it transmitted to another controller.
- **The right to object to processing:** You have the right to object to the processing of your personal data in certain circumstances, including for direct marketing purposes.

- **Rights in relation to automated decision-making and profiling:** You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

If you wish to exercise any of these rights, please contact us using the details provided in section 2.

11. Right to Withdraw Consent

Where we are relying on your consent to process your personal data (for example, for marketing communications), you have the right to withdraw your consent at any time. To do this, please contact us using the details provided in section 2.

12. Complaints

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

13. Changes to This Privacy Policy

We may update this privacy policy from time to time. Any changes will be communicated to you..

Contact Us

If you have any questions about this privacy policy or our data protection practices, please contact us at:

Email: Matt@Modest.Ltd

Phone: 07956149723