

PRIVACY NOTICE***Client's Personal Data***
General Data Protection regulation (GDPR)

This regulatory notice is solely for client's information. There is no need to take any action in relation to it.

What is GDPR?

It's a new law coming in force on 25th May 2018 affecting all industry sectors, which is designed to enable individuals to better control their personal data. Personal data is information that identifies individuals directly or from which individuals can be identified indirectly. In relation to client's personal data which held in CPM records, CPM can act either as the Data Controller, controlling the storage and usage of personal data, or the Data Processor, processing it to external associates, or both.

Why shall the client be informed?

One of the requirements of GDPR is to inform each client how personal data is processed. The processing includes obtaining, recording, storing and carrying-on any tasks by using personal data. This notice also describes data protection rights.

What are the requirements?

M&S Lyons Limited, (Trading as Hattons Gas) will act as the Data Controller of personal data provided. Personal data includes name, address, email, telephone number, mobile number, temporary residential address and Credit/Debit card number.

For what purposes will client's personal data be processed?

Personal data shall be processed for several different purposes:

- ❖ For providing the services requested from us by you via phone, E-Mail, Facsimile, Letter or Verbal;
- ❖ For reporting on provided services to the client;
- ❖ For verifying client's identity and carrying out regulatory checks;
- ❖ CPM will not collect any personal data which is not required for providing and overseeing requested services.
- ❖ For understanding the client's needs in order to provide a better service; For arranging events which may be of interest to the client; and
- ❖ For obtaining information in relation to your use of our website

All the personal data obtained is processed by M&S Lyons Limited, (Trading as Hattons Gas) staff in the United Kingdom and for the purposes of IT hosting and maintenance this information it is stored in servers located within the European Union. The third parties have no access to client's personal data and M&S Lyons Limited, (Trading as Hattons Gas) does not share client's personal data with the third parties unless:

- (A) this is required for the purpose of providing a client with the services requested from M&S Lyons Limited, (Trading as Hattons Gas) through agents/banks etc. on whose services M&S Lyons Limited, (Trading as Hattons Gas) relies in order to be able to provide with the services concluded between M&S Lyons Limited, (Trading as Hattons Gas) and the client,
- (B) the law requires such disclosure i.e. to regulatory authorities or,
- (C) the client provided with authorisation to disclose personal data by a specific consent letter provided to M&S Lyons Limited, (Trading as Hattons Gas) in writing.

The third parties whose services M&S Lyons Limited, (Trading as Hattons Gas) use may also transfer client's personal data to other third parties who in turn provide services to us. M&S Lyons Limited, (Trading as Hattons Gas) requires such third parties to put appropriate safe guards in place if it involves a transfer of personal data outside the EU.

M&S Lyons Limited, (Trading as Hattons Gas) follows Data Protection regime to oversee the effective and secure processing of client's personal data.

In what cases client's consent is required?

A consent is required in cases where the client has engaged another provider e.g. auditors, tax advisors, legal associates, etc. who request client's personal data from M&S Lyons Limited, (Trading as Hattons Gas), in order to provide with their services.

How long client's personal data shall be kept in M&S Lyons Limited, (Trading as Hattons Gas) records?

M&S Lyons Limited, (Trading as Hattons Gas) is obliged, under the English Laws and Regulations, to keep and update client's personal data for as long as M&S Lyons Limited, (Trading as Hattons Gas) provides its services to the particular client. Upon the



termination of business relationship, client's personal data shall be kept for a minimum of 5 years. After legally required period lapses, client's personal data shall be destroyed.

Do you subject my personal data to any automated decision making? No

What are the legal grounds on which CPM relies to process client's personal data?

These are as follows:

1. The processing is necessary for the performance of terms and conditions required to provide services between M&S Lyons Limited, (Trading as Hattons Gas) and the client.
2. The processing is necessary for compliance with a legal obligation
3. The processing is necessary for the purpose of M&S Lyons Limited, (Trading as Hattons Gas) legitimate interests
4. Client's consent to the processing
5. "Legitimate interests" is a heading that covers a number of different reasons why M&S Lyons Limited, (Trading as Hattons Gas) might need to process client's personal data which may not be covered by other headings, such as -
 - 5.1. To comply with regulation or regulatory guidance
 - 5.2. To prevent fraud or financial crime
 - 5.3. To provide a better service
 - 5.4. To build mutual relationship with the client by inviting the client to events in which the client might be interested
 - 5.5. To transfer personal data between group entities for internal administrative purposes or
 - 5.6. For the purposes of network or information security

What rights does the client has over their personal data?

GDPR gives a number of rights over client's data, subject that certain criteria are met. These are:

- ❖ Right of access - a right to obtain a copy of the data M&S Lyons Limited, (Trading as Hattons Gas) holds about the client as well as some supplementary information on that data,
- ❖ Right to rectification - a right to require M&S Lyons Limited, (Trading as Hattons Gas) to correct the data about the client,
- ❖ Right to data portability - a right to require M&S Lyons Limited, (Trading as Hattons Gas) to transfer personal data provided,
- ❖ Right to object - a right to object the processing of personal data on the basis of M&S Lyons Limited, (Trading as Hattons Gas) legitimate interests and or the processing of personal data for direct marketing purposes ,
- ❖ Right to erasure - a right to require M&S Lyons Limited, (Trading as Hattons Gas) to erase personal data that about the client

If the client wishes to exercise any of these rights, he/she shall contact usual M&S Lyons Limited, (Trading as Hattons Gas) contact/administrator who will provide with further information regarding how to exercise these rights.

Right to lodge a complaint

If the client wishes to raise a complaint on how M&S Lyons Limited, (Trading as Hattons Gas) has handled personal data, the client shall contact M&S Lyons Limited, (Trading as Hattons Gas) Data Protection officer who will investigate the matter.

If the client is not satisfied with M&S Lyons Limited, (Trading as Hattons Gas) response or believe M&S Lyons Limited, (Trading as Hattons Gas) is processing client's personal data not in accordance with the law, the client may file a complaint to the Office of the Commissioner for personal data protection.

M&S Lyons Limited, (Trading as Hattons Gas) Data Protection Officer is contactable at: expressgascentre@hotmail.co.uk