



## **PRIVACY POLICY**

*In the course of our work we may ask to collect personal information to help us deliver our services efficiently and effectively*

*We understand how important it is to protect that information so our policy sets out our approach to doing this. If anything requires clarifying or if there are any questions, please contact us as per Section 9 below*

### **Our policy covers:**

- 1. our registrations**
- 2. the type of information we collect**
- 3. how we collect it**
- 4. why we collect it**
- 5. information from other sources**
- 6. access to personal information**
- 7. how long we keep it**
- 8. protecting personal information**
- 9. contacting us**
- 10. policy updates**

### **1. OUR REGISTRATION**

*Urquhart & Co PHE is registered at Rhevackin Farm, Kiltarlity, Beauly IV4 7HT. Our registration number is SC423889*

*As required under The Data Protection Act 1998, **Urquhart & Co PHE Ltd** is registered with the Information Commissioner's Office (ICO) details below:*

**Information Commissioner's Office**  
**45 Melville Street, Edinburgh EH3 7HL**  
**Tel: 0303 123 1115**  
**Email: scotland@ico.org.uk**

*or*

**Information Commissioner's Office**  
**Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF**  
**Contact numbers: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number**  
**Fax: 01625 524 510**

*You can find out more about the ICO by visiting their website: [www.ico.org.uk](http://www.ico.org.uk)*

### **2. THE TYPE OF INFORMATION WE COLLECT**

*The information we collect may include:*

- your name and address, a contact telephone number, email and property details*
- details of anyone who is dependent and/or living with you, or details of anyone on whose behalf you are calling*
- details of an emergency or an enquiry*
- information in response to a survey*
- information that might arise in a conversation using social media*



- *information about special requirements you or others in your household may have*

### **3. HOW WE COLLECT INFORMATION**

*We may collect information when:*

- *our staff makes on the doorstep contact to explain about our work activities*
- *we are contacted by telephone, email or in writing*
- *completing a survey, or registering for services or other information*
- *contact is made to **Urquhart & Co (PHE) Ltd** via social media*
- *conversing with one of our employees, or one of our approved contractors or sub-contractors in person*

### **4. WHY WE COLLECT INFORMATION**

*We may use the information we collect to:*

- *deliver the services we provide to our clients*
- *respond to and deal with an emergency*
- *respond to and deal with an enquiry or complaint*
- *provide the services requested*
- *keep records so that we can ensure we have provided the appropriate level of service*
- *keep records in accordance with the law*
- *monitor trends on a general basis, for example to measure the types of enquiries and complaints we receive, or to track the number of people who write to compliment us – in these situations we anonymise the information so no individual can be identified*
- *fulfil our legal obligations under any commercial contract*

### **5. INFORMATION FROM OTHER SOURCES**

- *Sometimes individuals (for example, a neighbour) may provide us with personal information*
- *Members of the public may provide our employees, contractors and sub-contractors with personal information*
- *Other businesses may supply us with personal information*
- *We may be provided with personal information by regulators and the courts, within the terms of their data privacy obligation*

### **6. ACCESS TO PERSONAL INFORMATION**

*The people and organisations that may have access to personal information held by **Urquhart & Co (PHE) Ltd** include:*

- *employees and approved contractors and sub-subcontractors for the reasons set out in Section 4*
- *employees or approved contractors and sub-contractors who need to know personal information for the purposes of record keeping in accordance with the law and regulations, or in accordance with our policies*
- *third parties such as local authorities, courts and tribunals, regulatory bodies and/or law enforcement agencies for the purpose of complying with applicable laws and regulations, or in response to legal processes*
- *other third parties, if we have your consent, or to detect, prevent or otherwise address fraud, security or technical issues, or to protect against harm to the rights, property or safety of you, our employees, contractors or sub-contractors, or the public, or as otherwise required by law*



Everyone has right to access, obtain, rectify and or erase personal data. People can also restrict or object to us processing it any further. If so, please contact us in writing using the contact details set out in Section 9 below

It is important that the information we have in our records is both accurate and current. If information or circumstances change, we need to be informed

### **7. THE LENGTH OF TIME WE KEEP PERSONAL INFORMATION**

We keep personal information only for as long as we believe it necessary to fulfil the purpose for which it was collected, unless we are required to, or are permitted in law to keep it for longer

### **8. HOW PERSONAL INFORMATION IS PROTECTED**

1. We hold personal data in a combination of secure computer systems and paper-based files
2. We have security procedures in place to protect personal data from misuse, loss, unauthorised access, modification or disclosure
3. To achieve this we use a number of processes to protect personal data as appropriate, including:
  - locks and security systems
  - computer passwords
  - limited access to shared network drives to authorised staff
  - virus checking
  - firewalls and other “hard” and “soft” computer defenses where applicable
  - auditing procedures and data integrity checks
  - where appropriate, security classification to identify data needing special protection
  - anonymisation

Personal information provided to **Urquhart & Co (PHE) Ltd** is stored within the European Economic Area, subject to the protection of The Data Protection Act 1998, and to the protection of the General Data Protection Regulations, 25 May 2018. Our Data Controller is **Urquhart & Co (PHE) Ltd**

Where chat rooms, notice boards or social networking sites are used, individuals must be careful about giving out information about themselves or others

### **9. CONTACTING US**

- By letter to: Urquhart & Co (PHE) Ltd., Unit 4, 4 Walker Road, Inverness IV1 1TD
- By email to: [agnes@urquhartandcophe.co.uk](mailto:agnes@urquhartandcophe.co.uk),
- By phone to: 01463 223500

### **10. POLICY UPDATES**

This policy may be changed from time to time. The version of this statement is identified by the date shown below