Date of issue: 16/08/2025 Version: 1.00



# Privacy Policy

#### Introduction

Alphen Cleaning Ltd ("the Company", "we", "us") is committed to protecting your privacy and the confidentiality of personal information we collect. This Privacy Policy explains how we collect, use, store, and protect personal information relating to our clients, employees, suppliers, and contractors.

We comply with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and relevant industry regulations.

#### Information We Collect

Depending on the nature of our relationship with you, we may collect and process the following categories of personal information:

- Contact details name, address, email address, telephone number.
- **Employment and vetting details** identity documents, right-to-work information, DBS checks, training and certification records (e.g., BICSc qualifications).
- Operational data site access records, service delivery notes, and quality assurance reports.
- Payment details billing and invoicing information where applicable.
- Website and communications data IP address, device/browser information, and correspondence with us.

We only collect personal information necessary for business, legal, or contractual purposes.

#### How We Collect Information

We collect personal information:

- Directly from you (e.g., job applications, contracts).
- Through service operations (e.g., cleaning reports, audit logs, incident logs).
- From third parties where lawful (e.g., background checks, references, regulatory authorities).
- Through our website, forms, or direct communications (phone, email, post).

#### How We Use Information

We process personal information for the following purposes:

- Delivering cleaning and facilities services in line with contractual obligations.
- Vetting and managing employees, contractors, and suppliers.
- Monitoring service quality and ensuring safe, compliant operations.
- Meeting legal, regulatory, and health and safety obligations.
- Maintaining records for audit, insurance, and dispute resolution.
- Improving services and safeguarding staff, clients, and building users.

Date of issue: 16/08/2025 Version: 1.00



## Lawful Bases for Processing

We process personal data under one or more of the following legal bases:

- Contract to deliver agreed services.
- Legal obligation to comply with laws and regulations.
- Legitimate interest to safeguard staff and clients, monitor performance, and improve operations.
- Consent where you have given clear consent (e.g., optional communications).

## **Sharing Personal Information**

We may share personal information with:

- Regulatory bodies and authorities (where legally required).
- Clients (where necessary for service delivery and agreed under contract).
- Third-party service providers (e.g., IT support, vetting agencies, training providers).
- Insurers, auditors, and professional advisors.

We do not sell personal data to third parties.

#### International Transfers

If personal information is transferred outside the UK/EEA, we ensure it is protected by:

- Adequacy regulations approved by the UK Government or European Commission.
- Standard Contractual Clauses (SCCs).
- Explicit consent where appropriate.

### **Data Security and Retention**

We apply appropriate technical and organisational measures to protect personal information against unauthorised access, alteration, or loss.

We retain personal data only as long as necessary for business, contractual, or legal purposes. For example, service reports and audit logs are retained in line with company policy, unless required for an investigation.

## Your Rights

Under UK GDPR, you have the right to:

- Access your personal data.
- Request rectification or erasure.
- Restrict or object to processing.
- Data portability (where applicable).
- Withdraw consent where processing is based on consent.

Requests should be made to: <a href="mailto:dpo@alphencleaning.com">dpo@alphencleaning.com</a>. We aim to respond within one month.

Date of issue: 16/08/2025 Version: 1.00



## Complaints

If you have concerns about how we handle your information, please contact us first at <a href="mailto:dpo@alphencleaning.com">dpo@alphencleaning.com</a>.

If you remain unsatisfied, you may raise a complaint with:

#### **Information Commissioner's Office (ICO)**

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Tel: +44 303 123 1113 Website: <u>www.ico.org.uk</u>

#### **Review and Maintenance**

This Privacy Policy will be reviewed annually, or sooner if required by changes in legislation, operations, or industry standards.