



The Old Stables, A229 Cranbrook Road, Hawkhurst, Kent, TN18 4AG

General Data Protection Regulation (GDPR)

Company Name: CIT Group Management

Trading As: Wealden Technology LTD

Persons Responsible for GDPR: Toby Stripp, Dan Kennaird

1 General:

Wealden Technology LTD along with any other CIT Group company are committed to protecting your data and privacy. Your data is processed in accordance with GDPR (General Data Protection Regulation) Please read the sections below carefully as these outline our practices regarding how we process your data as well as your rights as outlined by GDPR

2 What data we request and why we request it:

2.1) In-Store or via telephone. We request personal data relating to the owner of any device we take in for repair at our store or to identify persons ordering goods or services.

This consists of:

- Name – Taken to allow us to identify your device in the event of lost job number.
- Address – Taken so we can contact you via letter if needed, as well as confirm device ownership in the event of a lost ticket receipt.
- Phone Number and/or E-mail – Taken as a primary method of contact in relation to your job.
- Passwords – We generally require passwords to gain access to a machine in order to rectify software issues or to test a device that has had hardware repair.
- Signature – We are required by GDPR to obtain a signature accepting our terms and conditions relating to how we handle your data

This data is used for the purpose of contacting the owner in relation to the repair and to send a follow up 2 weeks after collection to check everything is ok. This data is retained for a set period of time after repair to allow for warranty tracking as well as meeting certain legal requirements (see below under sections **How long we retain your data, Organisations and 3rd parties we share data with.**)

2.2) Other data:

2.2.1) Social media and web form enquiries (See section **Website visitors**)

2.2.2) CCTV consisting of Audio and Video recording operates within our stores, in the interest of crime prevention and public safety. These files are stored on an encrypted and password protected system only accessible to the necessary personal.



The Old Stables, A229 Cranbrook Road, Hawkhurst, Kent, TN18 4AG

3 Where we keep your data:

3.1) All data obtained upon booking in a job is kept in two places (3RD Parties). The first of those is with our ticketing system supplier RepairTech Solutions (Trading as RepairShopr) the software is an online system managed by RepairTech solutions and hosted via AWS (Amazon web services) Servers. All data is securely stored on AWS Servers and is only accessible to our staff via a 2 step login process consisting of company login followed by their unique usernames and passwords. RepairTech solutions have no access to any data we store.

3.2) Some sections of this data is also synchronised to our online accounts package QBO (QuickBooks online). This is protected in the same way as RepairShopr via unique username and password as well as 2 factor

3.3) Owing to the nature of our industry we sometimes need to back-up and/or access a client's data in order to proceed with the repair/service of a device. Any data we back up is stored internally on an encrypted and individual username and password protected Synology NAS Station. This data is locked and encrypted further in the event of any power out state (for example if the storage station was stolen). The encryption method used is AES-256bit, this can only be unlocked again using the unique encryption key that is held on USB by management (This key is stored in an MD5 hash format and is therefore only readable by its intended device).

4) How long we retain your data:

4.1) Personal information:

To assist with warranty tracking and fraud prevention as well as meeting legal requirements of financial transaction records, we retain personal data and job ticket details for a period of 6 years from last invoice or ticket (whichever is newer)

4.2) CCTV:

CCTV recordings are held for a maximum of 90 days after which time they are automatically deleted to make room for the system to continue recording. In some cases footage may be deleted sooner if the system requires space more quickly.

4.3) Data backups from device:

Device backups are held for 28 days from collection of a job. This is to allow you time to check your documents and data have migrated over ok as we are unable to retrieve these once they are deleted. The data remains held for the duration of the 28 days in the same way as outlined above.

5) Organisations and 3rd parties we share data with

5.1) In addition to the 3rd parties listed in section 3, we may disclose your information to other 3rd parties outlined below for the provision of meeting contractual agreements with you, as well as for our legitimate interests as follows.

5.1.1) Software providers such as Microsoft for the purposes of software licensing or account registration.

5.1.2) To our staff members in order to facilitate the provision of goods and services.

5.1.3) Royal mail or other couriers to facilitate the delivery of goods ordered.

5.1.4) Any entity/company owned by CIT Group Management to allow ease of internal administration.

5.1.5) HMRC and other authorities who require reporting of financial processing and records.

5.1.6) We will not pass information (via sale or free distribution) to other organisations without your explicit consent.

5.2) In some cases we may pass information to other organisations without gaining prior consent. We will only ever do this in the most extreme circumstances where we feel it is in the interest of crime prevention or public safety or to meet our legal obligations and duties. These organisations include, but are not limited to, the police, Legal advisers and any other government department where we have a legal obligation to comply.

6) Website visitors

6.1) We will collect and process personal data about you in the following circumstances whilst on our site.

6.1.1) When completing a web form on our website "request a quotation" or "contact us" We may collect and process the following details Name, Email address and/or telephone number. By providing these details you agree that we may use them in order to contact you in regards to your enquiry.

6.2) We will collect and process device details for analytical purposes and performance improvement/maintenance in the following way whilst on our site (This is statistical data about our users browsing actions and patterns, and does not identify you as an individual)

6.2.1) Device operating system

6.2.2) Web browser type (Chrome, Firefox ETC)

6.2.3) Global IP address



The Old Stables, A229 Cranbrook Road, Hawkhurst, Kent, TN18 4AG

6) Website visitors (continued)

6.3) Our site uses cookies to distinguish you from other visitors in order to improve your browsing experience.

6.3.1) We may use this data to improve our site and services

6.4) Where our website and/or social media accounts contain a link to a 3rd party site. It's important to note that these sites, as well as the organisations that own them may apply terms that differ to our own in regards to your personal data and processing. When following a link to a 3rd party site, we accept no responsibility or liability in relation to the way they process and record data. We strongly advise you check the privacy notice of any website you visit.

7) Our legal basis for storing and processing your data.

7.1) We will only use your data in accordance with GDPR and local data protection laws for the following reasons.

7.1.1) To complete tasks of a contract/repair ticket we enter in to with you.

7.1.2) To monitor and track past work in order to assist with any enquiries that arise after a completed repair.

7.1.3) For compliance with legal obligations we are subject to.

7.1.4) Where necessary pass this data on in the interest of public safety

8) Your rights to accessing, updating, restricting use of or deleting of personal data

8.1) You have the right to access information held about you and for this to be provided in an intelligible form. If you would like a copy of some or all of your personal information you can request this via your customer portal. You may also email hello@wealdentechnology.co.uk

8.2) It is important that the data we hold on you is accurate and up to date. Please inform us if the data we hold is inaccurate or outdated. You may also update the details yourself via the customer portal

8.3) Data protection legislation gives you the right to object to the processing of your personal data in certain circumstances or withdraw your consent to the processing of your personal data where this has been provided. You may edit your preferences via your customer portal or email us hello@wealdentechnology.co.uk

8.4) You may request we delete your personal information from our systems. This can be done by submitting a request via your customer portal or sending an email to hello@wealdentechnology.co.uk some data is unable to be removed due to legal obligations.



The Old Stables, A229 Cranbrook Road, Hawkhurst, Kent, TN18 4AG

9) Comments and questions

9.1 We have appointed a data protection officer to ensure compliance with this policy set out above. Should you have any questions, comments or requests please contact us hello@wealdentechnology.co.uk or phone 01580 388 591. This is in addition to your right to contact the ICO (information commissioner's office) should you be dissatisfied with our response. You may contact the ICO here [HTTPS://ICO.ORG.UK/GLOBAL/CONTACT-US](https://ico.org.uk/global/contact-us)