

# Data Privacy Policy

## 1. Purpose of This Policy

This Data Protection Policy sets out how **WFM Solutions Ltd** collects, uses, stores, and protects personal data in accordance with the **UK GDPR** and the **Data Protection Act 2018**. The company is committed to safeguarding the privacy of customers, suppliers, employees, and any other individuals whose data we process.

## 2. Scope

This policy applies to:

- All employees, contractors, and temporary staff
- All business operations including mobile tyre fitting, workshop services, fleet management, and wholesale supply
- All personal data processed through digital systems, telematics, CCTV, job sheets, invoicing systems, and customer service channels

## 3. Definitions

- **Personal Data:** Any information relating to an identifiable individual (e.g., name, phone number, vehicle registration, location data).
- **Special Category Data:** Sensitive information requiring extra protection (e.g., health data for employees).
- **Processing:** Any operation performed on personal data (collection, storage, retrieval, deletion).
- **Data Subject:** Any individual whose data is processed.
- **Controller:** The organisation determining how and why personal data is processed.
- **Processor:** A third-party handling data on behalf of the controller.

## 4. Data We Collect

We process the following categories of data:

### Customer & Supplier Data

- Contact details (name, address, phone, email)
- Vehicle information (registration, tyre specifications, fleet identifiers)
- Service history and job records
- Payment information (processed via secure third-party providers)

### Employee Data

- Contact details
- Employment records
- Training and certification data

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- Health and safety information
- Telematics and location data for mobile fitters (where applicable)

## Operational Data

- CCTV footage at depots and mobile units
- Call recordings for customer service
- Digital job sheets and inspection reports
- Fleet management system data

## 5. Lawful Basis for Processing

We process personal data under the following lawful bases:

- **Contractual necessity:** To supply tyres, complete mobile fitting jobs, manage warranties, and fulfil service agreements.
- **Legal obligation:** Compliance with HMRC, employment law, health & safety, and insurance requirements.
- **Legitimate interests:**
  - Managing fleet safety
  - Preventing fraud
  - Improving customer service
  - Protecting company assets
- **Consent:** Used only where required (e.g., marketing communications).

## 6. How We Use Personal Data

Personal data is used for:

- Scheduling tyre fitting and maintenance services
- Managing fleet accounts and service histories
- Processing orders, invoices, and payments
- Communicating with customers and suppliers
- Ensuring safety and compliance of mobile fitting operations
- Monitoring service quality and training needs
- Protecting staff, customers, and assets through CCTV and telematics
- Meeting legal and regulatory obligations

## 7. Data Sharing

We may share data with:

- Payment processors
- Fleet management platforms
- Insurance providers

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- Regulatory bodies (where legally required)
- Approved subcontractors performing tyre services
- IT service providers supporting our systems

Where we transfer your personal information outside WFM Solutions to third parties who help to provide our products and services, we obtain contractual commitments from them to protect your personal information.

## 8. Data Storage & Security

We implement robust technical and organisational measures including:

- Encrypted digital storage
- Secure cloud-based job management systems
- Access controls and role-based permissions
- Regular password and authentication reviews
- CCTV systems with restricted access
- Secure disposal of paper records
- Staff training on data protection and cyber security
- Incident response procedures for data breaches

## 9. Data Retention

We retain data only as long as necessary:

- Customer and job records: **6 years** (HMRC requirement)
- CCTV footage: **30–90 days** unless required for investigation
- Employee records: In line with employment law and H&S regulations
- Vehicle and fleet data: Duration of service contract + 2 years
- Marketing data: Until consent is withdrawn

Retention periods are reviewed annually.

## 10. Rights of Data Subjects

Individuals have the right to:

- Access their personal data
- Request correction of inaccurate data
- Request deletion (where legally permissible)
- Restrict processing
- Object to certain processing activities
- Request data portability
- Withdraw consent for marketing

Requests will be responded to within **one month**.

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## 11. Data Breach Procedure

In the event of a data breach:

1. The incident is logged and investigated immediately.
2. Containment measures are applied.
3. The Data Protection Officer assesses risk to individuals.
4. If required, the ICO is notified within **72 hours**.
5. Affected individuals are informed where there is a high risk to their rights.
6. A post-incident review is conducted.

## 12. Responsibilities

- **Directors:** Ensure compliance across the organisation.
- **Managers:** Implement procedures within their teams.
- **Employees:** Follow this policy and report any concerns.
- **Data Protection Officer:** Oversees compliance, training, and breach management.

## 13. Policy Review

This policy is reviewed **annually** or sooner if:

- Legislation changes
- New technologies are introduced
- Business operations expand (e.g., new depots, fleet services)

## 14. Contact

For data protection queries or requests:

e-mail us at [info@wfmsolutionsltd.co.uk](mailto:info@wfmsolutionsltd.co.uk) telephone 02892 690403, or write to us at WFM Solutions Ltd, 139 Banbridge Road, Dromore, Co. Down BT25 1NF marking correspondence for the attention of the Data Protection Officer. We will investigate and attempt to resolve complaints and disputes and will make every reasonable effort to honour your wish to exercise your rights as quickly as possible and, in any event, within the timescales provided by data protection laws.

To contact your data protection supervisory authority

The Information Commissioner's Office (ICO) is the UK's independent authority set up to uphold information rights and data privacy. The ICO's website can be found at [www.ico.org.uk](http://www.ico.org.uk), or you can call the helpline on 0303 123 1113.