

Project Lower Ltd's Privacy Policy

What's this all about?

This privacy policy covers how the [GDPR \(General Data Protection Regulation\)](#) impacts data processing at Project Lower Ltd in relation to its clients and users. You should read this document if you are a client, potential client or user of Project Lower Ltd's services. This policy provides an outline of how we collect and ensure the protection of a client's data in a manner compliant with data protection law. Upon induction, all members of our staff are required to sign a document stating that they agree to abide to all data protection laws.

What is GDPR?

The General Data Protection Regulation or GDPR is a replacement for the 1995 data protection directive and comes into force from 25th May 2018. It is designed to safeguard the data of EU individuals and will apply to all businesses processing the data of EU citizens, regardless of whether they (the business) resides in the EU or not. The new legislation expands on the existing data protection laws, with a focus on how companies handle and collect personal data.

Project Lower Ltd is committed to protecting your privacy

Here at Project Lower Ltd, our entire IT infrastructure surrounding personal data has always been built with security at heart. Any data in our possession is handled with the utmost care to ensure the protection of our clients.

Our Data Usage

What information does Project Lower Ltd collect?

We store the following details for clients and prospective clients that we engage with:

- Full name and salutation
- Date of birth
- Postal address
- Email address
- Contact phone number(s)

No details are kept which are not pursuant to the processing and administration of a client's contract.

How is the information collected?

Data is acquired primarily through digital means, through contact forms on our website and through online data platforms. We may also collect data manually upon request, after a client initiates contact or following a phone conversation with a prospective client. Any call recordings we store are saved in an encrypted format. A client could be anyone who enquires about working for Project Lower Ltd, doing business with Project Lower Ltd or an actual customer of Project Lower Ltd.

Why does Project Lower Ltd collect data?

Data is collected to allow us to communicate with, identify and conduct business with clients and prospective clients. Information is also stored in an effort to prevent fraud, unauthorised access and any other activities that are designed to damage or adversely affect Project Lower Ltd. Any marketing communications performed by Project Lower Ltd can be opted out of at any time.

Who will the data be shared with?

Upon a call recorded verbal contract, your data will be shared with your chosen energy supplier. Your data will never be shared with any other 3rd parties. Your chosen supplier will have their own terms and conditions that will be covered during the verbal contract.

Our Data Security

Where does Project Lower Ltd store data?

Client data is stored on servers on location in a secure, locked room. All the hardware used is managed and maintained by our IT department, with a robust backup policy to avoid any data loss. Any communication with these servers is done over secure, encrypted connections. Access to our servers is controlled through Active Directory and rigorously tested to ensure their security.

A hardware firewall is used to control access to the entire network, with an additional software firewall running on all our servers and computers, along with anti-virus software.

Our Data Access Policy

There are strict policies in place governing who can access data. Client data we hold can only be accessed by the client, authorised representatives of the client and Project Lower Ltd,

through secure interfaces. Staff are granted the minimum necessary permissions to personal data for them to fulfil their roles. Access is only provided to a client or representative after confirming the client or representative is who they say they are, through a set of security questions. Our software allows for records to be deleted upon request by an authorised database administrator, providing there is no legal basis to retain the information. A paper copy of data is only kept for staff members and this is securely shredded after they leave our employment, following a six-month retention period.

Project Lower Ltd will never sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so.