



AIR SOURCE DIRECT

AIRSOURCEDIRECT.CO.UK

Privacy Policy

May 2018

BY USING THIS WEBSITE, REQUESTING OR SUBMITTING A CLAIMS PACK (IN WHOLE OR PART) OR USING OUR SERVICES AND GIVING YOUR INFORMATION TO US, YOU INDICATE THAT YOU UNDERSTAND HOW WE WILL USE AND PROTECT YOUR PERSONAL INFORMATION ABOUT YOU AS DESCRIBED IN THIS PRIVACY POLICY.

This website (airsourcedirect.co.uk) is operated by Marvel Heating Limited.

Unless stated otherwise, Marvel Heating Limited is a data controller in respect of all personal data collected on this Website which means that we are responsible for ensuring that we do so in full compliance with the data protection and all other related privacy laws.

This Privacy Policy explains what personal information we may collect about you, how it is used, and what we do to keep it secure. We also explain your rights in respect of your personal information and how to contact us should this become necessary.

Links to other websites

Please note, this Website may contain links to other websites that are not controlled by us. These links are provided for your convenience. We are only responsible for our own privacy practices and our security of this Website. We recommend that you check the privacy and security policies and procedures of each and every other website that you visit.

THE INFORMATION WE COLLECT and ITS SOURCES

In order to provide you with the products and services you require, we may collect personal information about you from this Website or our other websites, telephone conversations, emails and written and verbal communications. This may include, for example, your name, address, email address, phone number and details of any services you request or which we provide to you or which are relevant to the service(s) in which you are interested. Occasionally we may ask for date of birth, for example, where the service you require has age related elements or for verification purposes.

We may supplement the information that you provide with other information that we obtain as a result of our dealings with you, from others who act on your behalf or who have been involved in your financial affairs or relating to any claim you may wish to make (such as your financial advisers (including your IFA, or SIPP trustee) or the Financial Services Compensation Scheme) or which we receive from other organisations such as underwriters, regulators and legal advisers.

Information about other people

If you provide information to us about any person other than yourself, you must ensure that they understand how their information will be used and that you are authorised to disclose it to us, and to consent to its use on their behalf, before doing so.

IP addresses

In order to understand how users use this Website and our services, we may collect IP addresses.

Cookies

In common with many other website operators, we may use standard technology called 'cookies' on this Website. Cookies are small pieces of information that are stored by your browser on your computer's hard drive and they are used to record how you navigate this Website on each visit.

Our cookies are used to enable us to develop our Website and to enable you to properly navigate it. We use cookies to collect personal information to enable us to reflect our users interests and by noting who has seen which pages, properties and advertisements (including click through from emails), how frequently particular pages are visited and to enable us to determine the most popular areas of this Website. We may use cookies to enrich your experience of using this Website by allowing us to tailor what you see to what we have learned about your preferences during your visits to this Website. Sometimes we may use services of third parties and they may use cookies on our behalf in order to provide their services.

The cookies we use on this Website are shown below:

Name of cookie	Type of cookie	Purpose of cookie
WordPress_test_cookie	Session	WordPress cookie to test if cookies are in use
wp-settings-	Session	WordPress cookie used to customise certain features on the Website
wp-settings-time-	Session	WordPress cookie used to customise certain features on the Website

PHPSESSID	Session	Allows us to track the current User's session ID
_session_id	Session	To help identify a specific user
session_last_active_at	Session	To track if a user can be given cached content
_csrf_token	Session	Token to stop cross-site request forgery
user_id	Persistent (deleted after 2 weeks)	To help identify a specific user who has ticked 'Remember me'
_utma _utmb _utmc _utmz	Google Analytics	Used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.
__ga	Google Analytics Persistent (deleted after 2 years)	These are cookies used by Google Analytics to produce usage statistics and provide us with analytics on our site. They are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.
__gat	Google Analytics Persistent (deleted after 10 minutes)	
__utma	Google Analytics Persistent (deleted after 2 years)	
__utmb	Google Analytics Persistent (deleted after 30 minutes)	
__utmc	Google Analytics Session	
__utmt	Google Analytics Persistent (deleted after 2 years)	
__utmz	Google Analytics Persistent (deleted after 6 months)	

You may also get cookies (including Flash cookies) from our Partners and advertisers if you click on their links or adverts. You should check their privacy and security policies to understand how they use these.

Preventing use of cookies

Most browsers automatically accept cookies, but you can usually change your browser to prevent cookies being stored. With experience, you can usually choose to switch off all cookies or to allow only certain 'trusted' sites to place cookies.

For further information on cookies and Flash cookies and how to switch them off see the Information Commissioner's website at www.ico.gov.uk or visit www.allaboutcookies.org or www.aboutcookies.org.

PLEASE NOTE, IF YOU DO TURN COOKIES OFF, THIS WILL LIMIT THE SERVICE THAT WE ARE ABLE TO PROVIDE TO YOU AND MAY AFFECT YOUR USER EXPERIENCE

HOW WE WILL USE YOUR INFORMATION

All personal information that we obtain about you and/or any other person whose details you provide will be held, used, and protected by us in accordance with the latest data protection law, our Terms of Use, this Privacy Policy and any Terms of Engagement we agree with you. We will primarily use the personal information:

- for registration and general administration (including verification, vetting and security checking)
- to provide and administer the products and services you request from us and any account you have with us (which will include tracing and collecting debts and fraud prevention)
- to communicate with you in the event that any products or services requested are unavailable or if there is a query or problem with your requests
- to obtain information from third parties who may have had some involvement in the subject matter of any claim you may have and those who may become involved in the claim
- to ensure appropriate documentation is prepared for any claim(s) we are dealing with for you
- to notify you of our progress in respect of the products and services we provide to you
- to comply with our legal and other regulatory obligations as a responsible claims management company
- for record keeping purposes
- to carry out market research so that we can improve the goods and services we offer
- for research purposes and to enable us to understand requirements and develop our services
- to track and analyse activity on our websites
- to create an individual profile for you so that we can enhance your user experience and to understand and respect your preferences.

With your consent, we will use the information we hold to inform you of products, services, events, newsletters and other information and opportunities that may be of interest to you.

Consent and lawful processing of personal data

The legal basis for the collection and processing of your personal data is:

- **for administration and service delivery:** that it is necessary to fulfil the contract that you are going to enter into or have entered into with us
- **for regulatory matters:** that it is necessary to comply with a legal obligation to which we, as a responsible claims management company, are subject
- **for direct marketing:** that you have given your consent
- **in all other cases:** that it is necessary for our legitimate interests which are to ensure our services meet or exceed our legal and regulatory obligations and/or to secure payment and this does not prejudice or harm your rights and freedoms

Disclosing your personal information

If you make a claim using our services, we will have to provide a lot of the information we hold (and which relates to the claim) to those against whom the claim is to be made. Where they are no longer trading, this will be the Financial Services Compensation Scheme.

We may also have to provide certain information about you and your claim to underwriters, insurers, legal advisers or, where we agree to extend credit to you, to lenders or payment recovery agents. Where required to do so by law or by a regulator, we may provide some of your personal information to appropriate regulators.

Occasionally, we may need to appoint other organisations to carry out some activities on our behalf. These will include for example, enquiry agents, couriers and service providers that provide telephone call handling agents as well as technology hosts, printing companies and mailing houses. In these circumstances, we will ensure that personal information is properly protected and that it is only used in accordance with this Privacy Policy.

GROUP COMPANIES AND PARTNERS

Marvel Heating is part of a group of companies, some of which provide services to Marvel Heating and others that carry out other activities on their own behalf (**Group Companies**),.

From time to time, Marvel Heating works with other selected organizations on a range of projects and they may be able to offer you products or services that may be of interest to you (**Partners**).

INVITATIONS, NEWSLETTERS, OFFERS AND OPPORTUNITIES

Marvel Heating would like to contact you and/or any person whose information you provide to us to invite you to enjoy other products and services in a number of ways, including by post, telephone, SMS, email or by social media.

Details of how to opt-in to or opt-out of receiving these invitations are on relevant pages of this Website, in relevant forms you complete and/or in the electronic message you receive.

[Preferences / subscribe / unsubscribe](#)

You, and any other person whose information you have provided to us, can change your/their mind about receiving details of other products and services at any time by using any of the methods shown below (see the section '**How to contact us**' below) or by following the instructions with each offer you/they receive.

SECURITY

We take the security of personal information seriously. We have security procedures and technology in place to ensure that our paper and computer systems and databases are protected against unauthorised use, loss and damage.

MONITORING

We may monitor or record telephone calls and any live chats for security purposes, to verify and demonstrate compliance with our legal and regulatory obligations and to improve the quality of the services we provide to you.

USE OF YOUR INFORMATION OUTSIDE THE EUROPEAN UNION

Other than in the context of any products or services we provide on your instructions, we would not usually expect to transfer any of your personal information outside of the European Economic Area.

However, if we do transfer your personal information to other territories, we will take proper steps to ensure that the information is properly protected in accordance with this Privacy Policy.

DATA RETENTION

We will normally keep website enquiry data for 6 months after your enquiry. All other personal data will normally be retained for three years after your last engagement with us or the final decision in any claim you may have (whichever is later). If after this time you have not taken up any further services, we will keep only minimal personal data about goods or services you have had from us, an outline of who the claim was against and the products / services involved, details of any decisions and awards and details of any preferences and consents.

CHANGES TO THIS PRIVACY POLICY

Privacy laws and practice are constantly developing and we aim to meet high professional standards. Our policies and procedures are, therefore, under continual review. We may, from time to time, update our security and privacy policies. We will send you a copy of our updated Privacy Policy if it changes but you can always check this page periodically to see our latest policy.

UPDATING AND CORRECTING INFORMATION

We encourage you to promptly update your personal information if it changes. If you delay, this could slow down any claim we are handling for you.

You can update or correct your personal information online in relevant client areas or by contacting us in writing or by email (see the section '**How to contact us**' below). Please include your name, address and/or email address when you contact us as this helps us to ensure that we accept amendments only from the correct person.

If you are providing updates or corrections about another person, we may require you to provide us with proof that you are authorised to provide that information to us.

YOUR RIGHTS

You have a number of legal rights in respect of your personal data. These include:

- **access.** The right to receive a copy of the personal data that we hold about you. The same right applies to any other person whose personal data you provide to us. We will require proof of identity and proof of authority if the request comes from someone other than the person whose data we are asked to provide. This will ensure we only provide information to the correct person. We normally expect to respond to requests within 28 days of receiving them.
- **withdraw consent to direct marketing.** You can exercise this right at any time and can update your preferences yourself or ask us to do it for you. See section '**Updating and correcting information**' above for details.

- **withdraw consent to other processing.** Where the only legal basis for our processing your personal data is that we have your consent to do so, you may withdraw your consent to that processing at any time and we will have to stop processing your personal data. Please note, this will only affect new activity and does not mean that processing carried out before you withdrew your consent is unlawful.
- **rectification.** If you consider any of your personal data is inaccurate, you can correct it yourself or ask us to do it for you (see section '[Updating and correcting information](#)' above for details).
- **restriction.** In limited circumstances you may be able to require us to restrict our processing of your personal data. For example, if you consider what we hold is inaccurate and we disagree, the processing may be restricted until the accuracy has been verified
- **erasure.** In some circumstances, for example, where we have no legal basis for retaining your personal data, you may be entitled to require us to delete your personal data.
- **portability.** Where you have provided personal data electronically to us, you may be entitled to request us to provide that data to you or to have us transmit it to another organisation
- **to complain to the Information Commissioner.** If you have any concerns about the way we process your personal data, we would prefer you to let us know so that we can try to resolve the matter. However, you have the right to make a complaint to the Information Commissioner which is the supervisory authority in the United Kingdom.

HOW TO CONTACT US

Email contact@airsourcedirect.co.uk

Mail

Notes:

- (1) We do not currently operate within a Group Company structure.
- (2) We do not currently operate with any Partners.