



GDPR Policy

A handwritten signature in black ink, appearing to read 'Paul Hamilton'.

Paul Hamilton, Director



Radiators | Underfloor | Renewables

GDPR & Data Protection Policy

Internal policy — how Hamilton Energi meets its obligations under the UK GDPR and Data Protection Act 2018.

This policy sets out how Hamilton Energi collects, processes and protects personal data in compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. It applies to all employees, contractors and third parties who process personal data on our behalf.

1. Purpose and Scope

This policy governs the processing of personal data relating to customers, employees, suppliers and any other individuals whose data Hamilton Energi handles. It sits alongside our customer-facing Privacy Policy, which explains our data practices to customers in plain terms.

2. Data Protection Principles

In line with Article 5 of the UK GDPR, Hamilton Energi ensures personal data is:

- Processed lawfully, fairly and transparently
- Collected for specified, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary (data minimisation)
- Accurate and kept up to date
- Kept no longer than necessary for the purposes it was collected
- Processed securely, using appropriate technical and organisational measures

Hamilton Energi is responsible for, and must be able to demonstrate compliance with, these principles (accountability).

3. Roles and Responsibilities

Data Controller

Hamilton Energi acts as the data controller for personal data collected through our business activities, including sales, marketing and customer service.

Data Protection Lead

A named individual within the business holds day-to-day responsibility for data protection compliance, including handling data subject requests and coordinating breach response. [Insert name/role — e.g. Data Protection Officer or Data Protection Lead]

All Staff

All employees and contractors must handle personal data in line with this policy and complete relevant data protection training.

4. Lawful Basis for Processing

Before processing personal data, we identify and document an appropriate lawful basis, which will typically be:

- Contract — to process orders and provide products or services
- Consent — for marketing communications and non-essential cookies
- Legitimate interests — for business administration, fraud prevention and service improvement
- Legal obligation — for example, tax and accounting record-keeping

Where processing relies on consent, we ensure it is freely given, specific, informed and can be withdrawn at any time.

5. Data We Process

This includes, but is not limited to:

- Customer data — contact details, order history, payment and delivery information
- Employee data — HR records, payroll, right-to-work and performance information
- Supplier and trade partner data — contact and contract details
- Website and marketing data — cookies, analytics, email preferences

Hamilton Energi does not knowingly process special category data (such as health or biometric data) except where strictly necessary, such as employee sick leave records, and only with appropriate additional safeguards.

6. Data Subject Rights

Individuals have the right to:

- Be informed about how their data is used
- Access their personal data (Subject Access Request)
- Rectify inaccurate data
- Erasure of data, in certain circumstances
- Restrict processing
- Data portability
- Object to processing, including direct marketing
- Not be subject to solely automated decision-making with legal or similarly significant effects

All requests to exercise these rights should be forwarded to the Data Protection Lead immediately. We aim to respond within one calendar month, as required by law.

7. Data Retention and Disposal

Personal data is retained only for as long as necessary for the purpose it was collected, in line with our data retention schedule. When no longer needed, data is securely deleted or anonymised. Retention periods include:

- Customer order and financial records — minimum 6 years (HMRC requirements)
- Employee records — duration of employment plus statutory retention period
- Marketing data — until consent is withdrawn or data becomes inactive

8. Data Security

Hamilton Energi implements appropriate technical and organisational measures to protect personal data, including:

- Access controls and role-based permissions
- Encryption of sensitive data where appropriate
- Secure, regularly updated IT systems and password policies
- Staff data protection training
- Secure disposal of physical and digital records

9. International Data Transfers

Where personal data is transferred outside the UK or European Economic Area, we ensure adequate safeguards are in place, such as an adequacy decision or approved standard contractual clauses.

10. Data Breach Procedure

Any suspected or actual personal data breach must be reported to the Data Protection Lead immediately. Where a breach is likely to result in a risk to individuals' rights and freedoms, we will notify the ICO within 72 hours of becoming aware of it, and inform affected individuals without undue delay where there is a high risk to them.

11. Third-Party Processors

Where third parties process personal data on our behalf (such as delivery couriers, IT providers or payment processors), we ensure a data processing agreement is in place requiring them to protect data to an equivalent standard and process it only on our documented instructions.

12. Training and Review

All staff receive data protection training appropriate to their role, refreshed periodically. This policy is reviewed at least annually, or sooner if there is a significant change in law, guidance, or our processing activities.

13. Complaints and Contact

- Internal contact: Data Protection Lead — customers@hamiltonenergi.com
- Regulator: Information Commissioner's Office (ICO) — ico.org.uk / 0303 123 1113

This is an internal governance policy and should be read alongside our customer-facing Privacy Policy. Replace bracketed placeholders with your organisation's specific roles and details before adoption.