Privacy Policy (UK GDPR Compliant)

Business Name: Carpenters Rose

Last updated: 4 December 2025

INTRODUCTION

Carpenters Rose ("we", "us", "our") is committed to ensuring the lawful, fair, and transparent processing of personal data in accordance with the United Kingdom General Data Protection Regulation ("UK GDPR"), the Data Protection Act 2018, and all applicable subordinate legislation. This Privacy Policy sets out, in comprehensive detail, the manner in which Carpenters Rose collects, uses, stores, discloses, and safeguards personal data. This document is intended to provide individuals ("you", "data subjects") with clear and intelligible information regarding their rights and our obligations under UK data protection law.

It is important to note that this website does not actively collect personal data, does not utilise cookies or analytics tools, and does not engage in any automated decision-making or profiling activities. However, Carpenters Rose may process personal data in the ordinary course of business when clients or prospective clients engage directly with us outside the website environment.

1. INFORMATION COLLECTED THROUGH THIS WEBSITE

Carpenters Rose affirms that this website does not intentionally or knowingly collect personal data. Specifically:

- No cookies or similar tracking technologies are deployed.
- No analytics, metrics, behavioural tracking, or digital profiling systems are utilised.
- No forms, comment features, or user input mechanisms are present.
- No embedded third-party elements (e.g., external video players, social widgets, advertising trackers) are loaded.

The hosting provider may, as part of its legitimate operational security processes, generate automated server logs including IP addresses, user-agent data, and access timestamps.

Carpenters Rose does not access, analyse, or process such data. Any such processing is carried out under the lawful basis of the hosting provider's legitimate interests (Article 6(1)(f) UK GDPR).

2. PERSONAL DATA COLLECTED DURING BUSINESS ACTIVITIES

When individuals or organisations engage Carpenters Rose in a professional capacity—such as through direct email, telephone communications, written correspondence, or contractual engagements—we may collect and process the following categories of personal data:

- Full name and identification information
- Email address, telephone number, and professional contact details
- Business name, registered office address, and billing information
- Information supplied in the course of contractual discussions
- Documentation or communications necessary for the performance of a contract
- Any additional information voluntarily provided by the data subject

Such information is obtained directly from the data subject or their authorised representative, and not via this website.

3. LAWFUL BASES FOR PROCESSING UNDER ARTICLE 6 UK GDPR

Carpenters Rose processes personal data only where a lawful basis applies, specifically:

a) Performance of a Contract (Article 6(1)(b))

Processing is necessary to enter into, administer, or fulfil a contractual arrangement with you, including the provision of services, the issuance of quotes, invoices, and other pre-contractual or contractual activities.

b) Legitimate Interests (Article 6(1)(f))

Carpenters Rose may process certain personal data where such processing is necessary for the purposes of our legitimate business operations, provided such interests are not overridden by your fundamental rights and freedoms.

c) Compliance with Legal Obligations (Article 6(1)(c))

We may process personal data where required to comply with statutory obligations including tax, accounting, financial reporting, audit requirements, and lawful requests from regulatory authorities.

Carpenters Rose does not rely on consent as a lawful basis except where explicitly required.

4. PURPOSES FOR WHICH PERSONAL DATA IS USED

Personal data may be used for:

- Communicating with clients and prospective clients
- Negotiating, administering, and fulfilling contractual obligations
- Maintaining accurate internal business records
- Complying with statutory obligations including tax and financial regulation
- Responding to lawful regulatory or legal requests
- Managing, protecting, and maintaining the integrity of our business operations

Carpenters Rose does not use personal data for automated decision-making or profiling.

5. DATA SHARING AND DISCLOSURE

We may share personal data only where necessary and lawful, including with:

- Professional advisers such as accountants or legal representatives
- Payment processors or financial institutions
- Regulatory authorities, government bodies, or law enforcement agencies (where legally required)

All third-party recipients are obligated to maintain confidentiality and data security. Carpenters Rose does not sell or transfer personal data to third parties for marketing.

6. DATA RETENTION

Carpenters Rose retains personal data only as long as necessary. Considerations include:

- The nature and sensitivity of the data
- The purpose for which it was collected
- Statutory or regulatory retention obligations
- Potential legal claims

Financial and transactional records are normally retained for a minimum of six (6) years in accordance with HMRC requirements.

7. RIGHTS OF DATA SUBJECTS UNDER UK GDPR

You are entitled to exercise the following rights:

- Right of Access
- Right to Rectification
- Right to Erasure
- Right to Restrict Processing
- Right to Object
- Right to Data Portability

Requests may be submitted via the contact details below. Identity verification may be required.

You may also lodge a complaint with the Information Commissioner's Office (ICO) at www.ico.org.uk.

8. ICO REGISTRATION

Carpenters Rose is registered with the Information Commissioner's Office ("ICO") as a data controller in accordance with the Data Protection Act 2018.

ICO Registration Number: Z1766457

This registration confirms our commitment to lawful, transparent, and accountable data processing practices. Details of our registration may be verified on the ICO public register.

9. INTERNATIONAL TRANSFERS

Carpenters Rose does not intentionally transfer personal data outside the United Kingdom. Where transfers become necessary, we will implement legally recognised safeguards including UK-approved Standard Contractual Clauses.

10. CHANGES TO THIS POLICY

Carpenters Rose reserves the right to amend this Privacy Policy to reflect legal, regulatory, or operational changes. The latest version will always be available on this website.

11. CONTACT INFORMATION

For questions, concerns, or rights requests, please contact:

general@carpentersrose.co.uk