

SEBPLUS LTD

PRIVACY POLICY

For customers, prospective customers, property contacts and website/service enquiries
United Kingdom

Effective date: 28.08.2026

1. About This Privacy Policy

- 1.1** This Privacy Policy explains how Sebplus LTD ("Sebplus", "we", "us" or "our") collects, uses, stores and shares personal data in connection with enquiries, quotations, bookings, contracts, property access, garden maintenance, lawn care, landscaping, tree work, pressure washing and associated services.
- 1.2** Sebplus LTD is the controller of personal data described in this Policy where we decide why and how that data is used.
- 1.3** This Policy is intended to provide the privacy information required by applicable UK data-protection law, including the UK GDPR and Data Protection Act 2018, as amended from time to time.
- 1.4** This Policy should be read alongside our Terms and Conditions and any specific privacy information provided when we collect data for a particular purpose.

2. Who We Are and How to Contact Us

- 2.1** Data controller: Sebplus LTD.
- 2.2 Registered/business address:** Unit B17, Alison Business Centre, Alison Crescent, Sheffield S2 1AS.
- 2.3 Privacy email:** INFO@SEBPLUS.CO.UK.
- 2.4 Telephone:** 07527628000.
- 2.5** If you have a question about this Policy, wish to exercise a data-protection right, or wish to complain about how we use your personal data, please contact us using the details above.

3. Personal Data We May Collect

- 3.1** Depending on the relationship and Service, we may collect the following categories of personal data:
- identity information, such as name and, where relevant, company or organisation name;
 - contact information, such as postal address, service address, email address and telephone number;
 - quotation, booking, contract, Service Plan and invoice information;
 - payment and transaction records (we do not necessarily store full card details where payment is handled by a payment provider);
 - property and access information, including gate instructions, key/lockbox information, access codes and alarm instructions where voluntarily supplied for Service access;
 - communications, including emails, SMS, WhatsApp or similar business messages, telephone notes and complaint records;
 - photographs and videos of the Site, garden, lawn, work, access route, pre-existing conditions, damage or completed work;
 - service and treatment records, including attendance, lawn observations, products used, quantities, after-care instructions and relevant weather or Site conditions;
 - information about landlords, tenants, occupiers, neighbours, managing agents or other contacts where necessary to arrange authorised access or Services;
 - CCTV or doorbell-related information where relevant to an incident, complaint or access arrangement;
 - marketing preferences and records of consent, opt-out or objection;
 - technical information generated through our website or online services where applicable, such as IP address, device/browser information and cookie data.
- 3.2** **We generally do not need special category personal data. If you voluntarily tell us about an allergy, sensitivity, disability or other health-related circumstance because it is relevant to safe delivery of a Service, we will only process that information where we have both an appropriate lawful basis under Article 6 UK GDPR and a valid condition for processing special category data under Article 9 UK GDPR. Where we rely on explicit consent for this purpose, we will ask for it clearly and you may withdraw it at any time. If the information is not necessary for the Service, please do not provide it.**

4. How We Obtain Personal Data

- 4.1** We may obtain personal data directly from you when you contact us, request a quotation, book a Service, accept a Service Plan, make a payment, communicate with us, provide access information, make a complaint or otherwise deal with Sebplus.
- 4.2** We may also receive relevant information from a landlord, tenant, managing agent, business, family member, property owner, neighbour, referral source, contractor or other person who is authorised or reasonably appears authorised to arrange Services or access.
- 4.3** Where we obtain personal data from another source, we will provide appropriate privacy information where required by law.

5. Why We Use Personal Data and Our Lawful Bases

5.1 We use personal data only where we have a lawful basis. The sections below link our main purposes for processing to the lawful bases we normally rely on. The basis that applies depends on the circumstances and the relationship concerned.

Contract and pre-contract steps

- responding to enquiries and preparing quotations or estimates;
- setting up Service Plans and bookings;
- providing, scheduling, rescheduling and managing Services;
- communicating treatment and after-care instructions;
- billing, taking or recording payments and administering the customer relationship.

Legitimate interests

5.2 Where appropriate, we may rely on our legitimate interests, or those of another person, provided those interests are not overridden by your rights and interests. Our legitimate interests may include:

- running and improving our business and customer service;
- keeping service, access, treatment and job records;
- protecting our staff, customers, property, equipment and legal rights;
- photographing Site conditions, work progress and completed work for evidence, quality control and portfolio purposes;
- preventing and investigating fraud, false claims, payment disputes and chargebacks;
- recovering lawful debts;
- managing complaints, disputes and insurance matters;
- business administration, professional advice, due diligence, restructuring and sale or acquisition of a business;
- limited direct marketing where permitted by applicable law.

Legal obligations

5.3 We may use and retain information where necessary to comply with tax, accounting, health and safety, employment, insurance, court, regulatory, data-protection or other legal obligations.

Consent

5.4 Consent may be used where required or appropriate, for example for certain electronic marketing or particular uses of identifiable images. Where we rely on consent, you may withdraw that consent at any time. Withdrawal does not affect processing that was lawful before consent was withdrawn.

5.5 In summary, our main processing purposes and usual lawful bases are:

- Enquiries, quotations, bookings and delivery of Services - contract or steps at your request before entering into a contract.
- Billing, payments and administration of the customer relationship - contract and, where applicable, legal obligation.

- Service, access, treatment, quality-control and evidence records - legitimate interests, and legal obligation where applicable.
- Fraud prevention, complaints, disputes, debt recovery, insurance and protection of legal rights - legitimate interests and, where applicable, legal obligation.
- Business administration, professional advice and corporate transactions - legitimate interests and, where applicable, legal obligation.
- Direct marketing - consent or legitimate interests where permitted, together with the applicable PECR rules.

6. Property Access, Keys and Access Codes

- 6.1** Where you provide keys, gate codes, lockbox details, alarm instructions or other access credentials, we use them only as reasonably necessary to provide authorised Services, manage access and protect the Site.
- 6.2** We aim to limit access information to personnel or contractors who need it for the Service. Access credentials should not be used for unrelated purposes.
- 6.3** You should tell us promptly when a key, code, alarm instruction or access permission changes or is withdrawn.
- 6.4** We may retain a record that access credentials were provided and, where operationally necessary, the credential itself for the duration of the authorised access arrangement. Physical keys should be returned, transferred or securely disposed of when no longer reasonably required.

7. Photographs and Video

- 7.1** We may take photographs or video before, during or after work for service records, evidence of Site condition, quality control, insurance/dispute handling, portfolio documentation and marketing.
- 7.2** For public marketing, we will take reasonable steps not to publish identifiable images of individuals without appropriate permission and to avoid, crop, obscure or remove information such as house numbers, vehicle registration plates or other details where publication could unnecessarily identify a customer.
- 7.3** Where an image contains personal data, we process it under an appropriate lawful basis. You may contact us if you have concerns about a particular image or its proposed marketing use.

8. CCTV, Video Doorbells and Recordings

- 8.1** Sebplus personnel may work at properties where CCTV, doorbells or other recording systems operate. The person operating those systems is responsible for their own compliance with applicable privacy and data-protection law.
- 8.2** If a recording involving our personnel is supplied to us in connection with an incident, complaint, insurance matter or dispute, we may use and retain the relevant recording where necessary to investigate and protect legal rights.

9. Service and Treatment Records

- 9.1** We may keep records of attendance, work completed, lawn or Site condition, products applied, quantities, instructions, photographs, weather observations, access issues and Client communications.
- 9.2** These records may be used to manage future Services, demonstrate work performed, comply with legal or regulatory obligations and investigate complaints, claims or payment disputes.

10. Who We May Share Personal Data With

- 10.1** Where necessary and lawful, personal data may be shared with categories of recipients including:
- Sebplus employees and authorised personnel;
 - specialist subcontractors and contractors engaged to provide or support Services;
 - IT, hosting, email, communications, booking, CRM, accounting and business-software providers;

- payment processors, banks and financial-service providers;
- accountants, bookkeepers, solicitors, insurers, insurance brokers and other professional advisers;
- debt-recovery providers and courts where necessary for lawful recovery or disputes;
- suppliers where information is genuinely necessary to fulfil an order or Service;
- regulators, law-enforcement bodies, government authorities or other parties where disclosure is required or permitted by law;
- a purchaser, investor, lender, adviser, insolvency practitioner or other relevant party in connection with a proposed or completed sale, merger, acquisition, restructuring or transfer of all or part of the business.

10.2 We do not treat this Policy as permission to sell a standalone customer marketing list to unrelated third parties. Any sharing of a database or customer list must have an appropriate lawful basis and comply with applicable data-protection and direct-marketing rules.

11. Sale, Merger or Transfer of the Business

11.1 If Sebplus is sold, merged, reorganised, transferred, financed or subject to a similar corporate transaction, relevant customer and business records may form part of the due diligence process and may be transferred to a purchaser or successor where lawful and reasonably necessary.

11.2 Before and during such a transaction, we will consider what data is being transferred, why it was originally collected, the lawful basis for sharing, data minimisation, confidentiality, security and the rights of affected individuals.

11.3 Where the transaction results in a change of controller or other change that requires individuals to be informed, appropriate information will be provided in accordance with applicable law.

11.4 A successor organisation receiving personal data must handle that data in accordance with applicable data-protection obligations.

12. Subcontractors and Service Providers

12.1 Some organisations process personal data on our behalf as processors. Where required, we use appropriate contractual arrangements requiring them to protect personal data and act only on permitted instructions.

12.2 Some recipients may act as independent controllers for their own legal or professional purposes, for example banks, insurers, accountants or solicitors.

13. Direct Marketing

13.1 We may contact customers and prospective customers about Sebplus Services where permitted by applicable UK data-protection and electronic-marketing law.

13.2 For marketing by email, SMS or similar electronic message to individuals, we will use consent or another lawful route available under the Privacy and Electronic Communications Regulations (PECR), such as the customer 'soft opt-in' where its requirements are satisfied.

13.3 Where we rely on the customer soft opt-in, marketing will concern our own similar products or services and an opportunity to opt out will be provided when details are collected and in each marketing message, as required.

13.4 **You have an absolute right to object to direct marketing at any time. You can ask us to stop by using any unsubscribe method provided in the message or by contacting us using the details in this Policy. We may retain limited suppression information so that we can respect your opt-out.**

14. Website and Cookies

14.1 If our website uses cookies or similar technologies, we will provide appropriate cookie information and, where required, obtain consent before placing non-essential cookies.

14.2 Website analytics, security and enquiry information will be processed under an appropriate lawful basis and in accordance with any cookie notice displayed on the website.

15. International Transfers

15.1 Some technology or service providers may store or process personal data outside the United Kingdom.

15.2 Where personal data is subject to a restricted international transfer, we will use an appropriate transfer mechanism or safeguard required by applicable UK data-protection law, such as applicable adequacy regulations or contractual safeguards.

15.3 You may contact us for further information about relevant safeguards where applicable.

16. How Long We Keep Personal Data

16.1 We keep personal data only for as long as reasonably necessary for the purposes for which it was collected and for legitimate legal, accounting, tax, insurance, safety and dispute-resolution needs.

16.2 Retention periods vary according to the type of record. In determining them, we consider the duration of the customer relationship, contractual and statutory limitation periods, tax/accounting requirements, warranty periods, health and safety requirements, claims history and whether information is needed to establish, exercise or defend legal rights.

16.3 Access credentials should be deleted, returned or securely disposed of when they are no longer reasonably required for authorised access, subject to any record we legitimately need to keep.

16.4 Marketing suppression records may be retained for as long as reasonably necessary to ensure that an opt-out continues to be respected.

17. Security

17.1 We take reasonable technical and organisational measures appropriate to the nature of the personal data and the risks involved. These may include access controls, password protection, device security, limiting staff access, secure storage and appropriate arrangements with service providers.

17.2 No method of storage or transmission is completely risk-free. If we become aware of a personal-data breach, we will assess and handle it in accordance with applicable legal requirements, including notification to the ICO and affected individuals where required.

18. Your Data-Protection Rights

18.1 Depending on the circumstances and applicable law, you may have rights including:

- the right to be informed about how your personal data is used;
- the right to request access to your personal data;
- the right to request correction of inaccurate or incomplete data;
- the right to request erasure in certain circumstances;
- the right to request restriction of processing in certain circumstances;
- the right to object to certain processing, including direct marketing;
- the right to data portability in certain circumstances;
- rights relating to solely automated decision-making where applicable;
- the right to withdraw consent where processing is based on consent.

18.2 These rights are not absolute in every situation. We may need to verify identity and may lawfully retain or continue using information where an exemption or another legal basis applies.

18.3 We do not currently intend to make significant decisions about customers based solely on automated processing.

Your right to object - important

18.4 Where we rely on legitimate interests, you may object to that processing on grounds relating to your particular situation. We will consider the objection in accordance with applicable law.

18.5 If your objection relates to direct marketing, you can object at any time and we will stop using your personal data for that direct-marketing purpose.

19. Complaints and the Information Commissioner's Office

19.1 If you have concerns about our use of personal data, please contact Sebplus first so we can investigate.

19.2 You also have the right to complain to the UK Information Commissioner's Office (ICO). Current contact and complaint information is available from the ICO's official website.

ICO website: <https://ico.org.uk/>

20. Children

20.1 Our Services are generally contracted by adults and businesses. We do not intentionally collect personal data from children for marketing purposes.

20.2 Incidental images of children should not be used in public marketing without appropriate permission. Where children are present at a Site, safety-related information may be processed only as reasonably necessary.

21. Accuracy of Information

21.1 Please provide accurate information and tell us when relevant contact, billing, property or access information changes.

21.2 We may update information where we reasonably establish that existing records are inaccurate or out of date.

22. Changes to This Privacy Policy

22.1 Sebplus may update this Privacy Policy from time to time to reflect changes in our Services, systems, business structure or legal requirements.

22.2 The current version may be made available on our website, with contractual documents, electronically or on request.

22.3 Where applicable law requires us to actively inform individuals about a material change in how their personal data is processed, we will do so using an appropriate method.

23. Relationship With Our Terms and Conditions

23.1 Our Terms and Conditions govern the contractual supply of Goods and Services. This Privacy Policy explains how personal data is handled.

23.2 Acceptance of our Terms does not replace any consent that the law specifically requires for a particular type of personal-data processing or electronic marketing.

24. Contact Details

24.1 For privacy questions, requests or complaints, contact:

- Sebplus LTD
- Unit B17, Alison Business Centre, Alison Crescent, Sheffield S2 1AS
- INFO@SEBPLUS.CO.UK
- 07527628000

