Privacy Notice





Unit 3 The Courtyard Orbital Park Ashford Kent TN24 0SY

This Policy is reviewed regularly and at least annually. Reviewed May 2018 Red Alert takes privacy very seriously. We ask that you read this Privacy Notice carefully as it contains important information about what to expect when Red Alert collects personal information and how Red Alert will use personal data.

Red Alert's registered office is:

Unit 3 The Courtyard, Orbital Park, Ashford Kent TN24 0SY

This Notice applies to information we collect about:

- CCTV images which are used for building and personal security
- Visitors to our website details of how you use our website and where you have accessed it from
- People who do business with us and register for our service as well as others whose personal identifiable data we obtain through third party organisations
- Our staff to fulfil HR functions

The kind of information we may collect and hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

When you do business with us and/or register for our services we may collect the following personal information from you:

Personal contact details such as name, title, addresses, telephone numbers and personal email address; Date of birth; Gender; National Insurance number; Bank account details; Credit/debit card details; Ethnicity; Next of Kin (Emergency contact details); and Keyholder and/or responders details

How is your personal information collected?

We may collect your personal information from the following sources:

- When you join Red Alert (as an employee)
- When you contact Red Alert (for example by phone, email or letter or via the website)
- When you use our services

How we will use the information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the contract we have entered into with you;
- Where we need to comply with a legal obligation; and
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else's interests); or
- Where we need to protect your vital interests (or someone else's interests); or
- Where it is needed in the public interest or for official purposes.

Situations in which we will use your personal information

We need some of the categories of information in the list above. Primarily to allow us to perform our contract with you and to enable us to comply with legal obligations.

In some cases, we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below:

• If you pay us for our work by credit/debit card then we will share those details with a credit/debit card merchant when payment is made. Those details are then stored by the credit/debit card merchant and not by Red Alert.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Automated decision-making

We do not undertake any automated decision-making.

Data sharing

We may have to share your data with third party service providers.

We require third parties to respect the security of your data and to treat it in accordance with the law.

Why might you share my personal information with third parties?

We may share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents). The following third-party service providers process personal information about you for the following purposes: IT services, auditors/assessors, credit/debit card merchants for processing payments, consultants and service providers who provide services to us in order that we may provide such services to you.

How secure is my personal information with third-party service providers?

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

What about other third parties?

We may share your personal information with a regulator or to otherwise comply with the law or our governing body.

Data security

We have put in place measures to protect the security of your personal information. Details of these measures are available upon request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

How long will you use my personal information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once your transaction has concluded we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact us in writing:-

Email - <u>dp@redalertuk.com</u>

Postal - The Courtyard, Orbital Park, Ashford, Kent TN24 0SY

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact us in writing. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Data Protection Officer

We have appointed a Data Protection Officer (DPO) to oversee compliance with this legislation. If you have any questions about this Privacy Notice or how we handle your personal information, please contact the DPO:-

```
Email - <u>dp@redalertuk.com</u>
Postal - The Courtyard, Orbital Park, Ashford, Kent TN24 0SY
```

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. Contact details for the ICO can be found at <u>https://ico.org.uk/global/contact-us</u>.

Marketing

We may also wish to provide you with information about special features of our website or any other service we think may be of interest to you. If you would rather not receive this information, please send an email message to <u>dp@redalertuk.com</u>. If you agree to us providing you with marketing information, you can always opt out at a later date.

Cookies and other information-gathering technologies

Our website does not use cookies.

How we protect your information

We have put in place the following security procedures and technical and organisational measures to safeguard your personal information:

We do not store or process any personal information on our website.

To maintain security of the website we have a strict password allocation policy and any enquiries that come via the website are sent by email and the user accepts that by using the enquiry facility they are consenting for their contact details to be submitted. These details are not stored anywhere on the site.

The security measures for our website are maintained and enforced by Cube Design.

We will use all reasonable efforts to safeguard your personal information. However, you should be aware that the use of the Internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal information which is transferred from you or to you via the Internet.

Changes to Privacy Notice

We reserve the right to update this Privacy Notice at any time. If we make any changes we will post the changes on our website so that you may be aware of the information we collect and how we use it at all times.

We may also notify you in other ways from time to time about the processing of your personal information.

How to contact Red Alert

We welcome your views about our website and our Privacy Notice. If you would like to contact us with any queries or comments please send an email to <u>dp@redalertuk.com</u> or send a letter addressed to Data Protection Officer Red Alert, Unit 3 The Courtyard, Orbital Park, Ashford, Kent, TN24 0SY.

Links to other websites

This Privacy Notice applies only to this website so when you access links to other websites you should read their own privacy policies.

What to do if you are unhappy with how we handle your personal data

If you are unhappy with how we handle your personal data we would like you to tell us first (via email to <u>dp@redalertuk.com</u>), or in writing The Courtyard, Orbital Park, Ashford, Kent TN24 OSY. However, you are entitled to raise matters direct with the Information

Commissioner's Office if preferred. Contact details for the ICO can be found at <u>https://ico.org.uk/global/contact-us</u>.