

### **Privacy Policy**

### **Index Security System's GDPR Privacy Statement**

Your information will be held by Index Security Systems Limited.

#### How we use your information

This privacy notice is to let you know how we look after your personal information.

This includes what you tell us about yourself, what we learn by having you as a customer, and the choices you give us about, what - if any, marketing information you may want us to send you.

This notice explains how we do this and tells you about your privacy rights and how the law protects you.

## **Your Privacy**

We undertake:

- To keep your data safe and private at all times
- Never to sell your data.
- To give you ways to manage and review any marketing choices.

# Data Protection law changes on 25 May 2018 as the General Data Protection Regulations [GDPR] come into effect

This notice sets out your rights under this new law.

#### How the law protects you

As well as our commitments [above], your privacy is protected by law. The following explains how that works.

Data Protection regulations say that we can use personal information only if we have a proper reason to do so.

This includes any sharing of it outside the Company.

The law says we must have one or more of these reasons:

- o To fulfil a contract we have with you, or
- When it is our legal duty, or
- When it is in our legitimate interest, or
- When you consent to it.

A legitimate interest is when we have a business or commercial reason to use your information.

But even then, it must not unfairly go against what is right and best for you.

If we rely on our legitimate interest, we will tell you what that is.

Basically our legitimate interest is the commercial relationship related to the services we provide / support you with.

## Where we collect personal information from

We may collect personal information about you (or your business) from these sources:

- Data you give to us
- When you apply for our products and services
- When you talk to us on the phone
- When you use our website,
- o In emails and letters
- In customer surveys
- Data we collect when you use our services
- Social networks
- Government and law enforcement agencies.

#### Who we share your personal information with

We may share your personal information these organisations:

- HM Revenue & Customs, regulators and other authorities
- o Persons / Organisations you ask us to share your data with
- Our Alarm Receiving Centre if you have a 'monitored' Intruder, CCTV or Fire Detection & Alarm system. Typically this will be contact details of you & your key holders for contact purposes if the alarm activates.

No one else

#### The information we use

These are some of the kinds of personal information that we use:

- Name
- Business address
- Contact details, such as personal email addresses and mobile or home phone numbers
- Financial data

 Data that identifies computers or other devices you use to connect to the internet. This includes your Internet Protocol (IP) address.

If you have one of our CCTV systems, we obviously will see recorded images when we commission or service your system.

All involved staff are security screened for this purpose. We just ask that you do register your CCTV System with the Information Commissioners Office and that you have applicable 'warning' signage displayed.

We can provide recording download support, but only if you make a formal request to the office. Our Engineers have been instructed to only conduct such actions where we advise them they are permitted to do so.

### Sending data offshore

We do NOT send any of your data offshore, however some of our survey databases 'may' be held overseas.

The only 'data' they have would be your personal email address.

For reference they are NOT authorised to use this data in ANY form.

### **Marketing**

We may use your personal information to tell you about relevant products and offers. This is what we mean when we talk about 'marketing'.

The personal information we have for you is made up of what you tell us, and data we collect when you use our services.

We study this to form a view on what we think you may want or need, or what may be of interest to you.

This is how we decide which products, services and offers may be relevant for you.

We can only use your personal information to send you marketing messages if we have either your consent or a 'legitimate interest'.

That is when we have a business or commercial reason to use your information. It must not unfairly go against what is right and best for you.

You can ask us to stop sending you marketing messages by contacting us at any time.

Whatever you choose, you'll still receive statements, invoices and other important information such as changes to your existing products and services by email.

We may ask you to confirm or update your choices, if you take out any new products or services with us in future.

We will also ask you to do this if there are changes in the law, regulation, or the structure of our business.

If you change your mind you can update your choices at any time by contacting us.

#### How long we keep your personal information

We will keep your personal information for as long as you are a customer of the Company.

After you stop being a customer, we have to keep relevant records for statutory minimum periods for one of these reasons:

- To respond to any questions or complaints.
- To maintain records according to rules that apply to us.
- We may keep your data for longer if we cannot delete it for legal, regulatory or technical reasons.

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# How to get a copy of your personal information [Referred to as Subject Access Rights]

You can access details of the personal information we hold at any time simply by contacting us. We have 1 month to supply you with respective details.

#### Letting us know if your personal information is incorrect

You have the right to question any information we have about you that you think is wrong or incomplete.

Please contact us if you want to do this.

If you do, we will take reasonable steps to check its accuracy and correct it.

#### What if you want us to stop using your personal information?

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it.

This is known as the 'right to object' and 'right to erasure', or the 'right to be forgotten'.

There may be legal or other official reasons why we need to keep or use your data.

But please tell us if you think that we should not be using it.

We may sometimes be able to restrict the use of your data. This means that it can only be used for certain things, such as legal claims or to exercise legal rights.

In this situation, we would not use or share your information in other ways while it is restricted.

#### You can ask us to restrict the use of your personal information if:

- It is not accurate.
- o It has been used unlawfully but you don't want us to delete it.
- o It is not relevant any more, but you want us to keep it for use in legal claims.
- You have already asked us to stop using your data but you are waiting for us to tell you if we are allowed to keep on using it.

If you want to object to how we use your data, or ask us to delete it or restrict how we use it or, please contact us

### How to withdraw your consent for non-statutory personal information

You can withdraw your consent at any time.

Please contact us if you want to do so.

If you do withdraw your consent, we may not be able to provide certain products or services to you. If or where this is so, we will tell you.

#### How to complain

Please let us know if you are unhappy with how we have used your personal information.

You also have the right to complain to the Information Commissioner's Office if we do not respond to your complaint appropriately and in a timely manner.

Find out on their website how to report a concern.

#### = The Principles of good Data Protection =

For your reference, these are:

- 1. processed lawfully, fairly and in a transparent manner in relation to individuals;
- 2. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further

processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;

- 3. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- 4. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- 5. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- 6. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

#### To support the above..

We have relevant security controls in place, both physically and electronically to protect your data.

These are supported by Data Audits we conduct to check related controls remain effective.

All staff have been suitably briefed in GDPR requirements and involved controls / disciplines.

#### **Index Security Systems Ltd**

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