

GDPR REC - Privacy Notice (Tier 4)

1. Scope

All data subjects whose personal data is collected in line with the requirements of the GDPR.

2. Responsibilities

2.1 The Compliance Manager, in the role of Data Protection Officer, is responsible for ensuring that this notice is made available to data subjects prior to Focus Security Systems Limited collecting/processing their personal data.

2.2 All Employees/Staff of Focus Security Systems Limited who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

3. Privacy notice

3.1 Who are we?

Focus Security Systems Limited install, service & maintain and monitor electronic security systems; CCTV, Access Control, Intruder Alarms & Fire Detection Systems.

Our Compliance Manager and data protection representatives can be contacted directly here:

- Email: compliance.manager@focusonsecurity.com
- Telephone: 08001832233

3.2 Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

“any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

In order that we can process orders, administer your account, provide the goods and services and meet all contractual obligations, the following information might be requested:

- Company name
- Contact name
- Job title
- Business telephone number
- Business email address
- Mobile telephone number
- Bank account information (when applicable)
- Date of birth (when applicable)
- Home address (when applicable)

This information is gathered by in-person request and we shall only collect the data necessary to provide the goods or services, or such as is required for security screening in the case of new employees. We do not collect special category data.

3.3 How we use your information?

Focus Security Systems Limited will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. We are required to retain information in accordance with the law and how long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

In order for us to provide the services we need to collect personal data for correspondence purposes and/or detailed service provision. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

We process your information for the purpose of delivering the goods and services, in the legitimate interest of Focus Security Systems Limited and its clients and may use the information to contact you in order to provide the goods and/or services.

Personal information which you supply to us may be used in a number of ways, for example:

- To set up your account and process orders
- To provide the necessary credit reference detail to our Brokers for finance agreements
- To provide necessary key-holder information – in the case of monitored alarms and CCTV
- For continuing administration of your account and all goods and services provided

3.4 Will Focus Security Systems Limited share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to Focus Security Systems Limited in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with our procedures. If there is a requirement for sensitive personal data to be passed onto a third party we will only do so once we have obtained your consent, unless we are legally required otherwise.

3.4.1 Disclosure

We will not pass on your personal data to third parties without first obtaining your consent. We do use third party service providers for the purposes of lease rental financing of equipment, and provision of remote monitoring services. They will receive your personal data for the following purpose(s) as part of the processing activities:

1. Purpose: Provision of Lease Rental Financing;

As part of the credit acceptance procedures for lease rental financing, relevant Personal Data (see 3.2) will be forwarded to our Brokers. Dependent on trading status additional personal information may also be requested.

Additional Personal Data if applicable and requested:

- Private address details/history;

- Date of birth
- Details of any County Court Judgements

2. Purpose: Provision of Remote Monitoring Services

In order to provide these services we will need to forward key-holder contact information.

Applicable Personal Data

- Contact name
- Contact phone numbers

3.5 Under what circumstances will Focus Security Systems Limited contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure. We will contact you for correspondence purposes and/or detailed service provision.

3.6 Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for Focus Security Systems Limited to process all personal data, but it must be explicitly given. Where we request personal data we will always tell you why and how the information will be used.

You may withdraw consent at any time by contacting the Compliance Manager and in such circumstance our Withdrawal of Consent Procedure will be applied.

3.7 Retention period

Focus Security Systems Limited will process personal data for the duration of the contract and such time afterwards as industry standards require and will store the personal data in accordance with our Retention Period documented information.

3.8 Where there is a legitimate interest

We may use and process your personal information where it is necessary for us to pursue our legitimate interests as a business for the following purposes:

- for analysis, and profiling to inform our marketing strategy, and to enhance and personalise your customer or visitor experience;
- for market research in order to continually improve the products and services that we and our authorised dealers deliver to you;
- to administer our websites and for internal operations, including troubleshooting, testing, statistical purposes;
- for marketing activities (other than where we rely on your consent) e.g. to tailor marketing communications or send targeted marketing messages via social media and other third party platforms;
- for the prevention of fraud and other criminal activities;
- to undertake credit checks for finance;

- to correspond and communicate with you;
- to create a better understanding of you as a customer or visitor;
- for network and information security in order for us to take steps to protect your information against loss or damage, theft or unauthorised access;
- to comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request);
- for the purposes of corporate restructure or reorganisation or sale of our business or assets;
- for efficiency, accuracy or other improvements of our databases and systems e.g. by combining systems or consolidating records we or our group companies hold about you;
- to enforce or protect our contractual or other legal rights or to bring or defend legal proceedings; and
- for general administration including managing your queries, complaints, or claims, and to send service messages to you.

3.9 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- You have the right to know exactly how your personal data will be processed by us. We commit to processing your data fairly, lawfully and transparently, details of which are set out in this Privacy Notice.
- Right of access – you have the right to request access to the Personal Data we hold about you.
- Right of rectification – you have the right to request changes to data we hold about you that is inaccurate or incomplete.
- Right to be forgotten – you have the right to request erasure of your data or the right to be forgotten completely, where there is no legitimate reason for your data to continue to be processed.
- Right to restriction of processing – you have the right to request that processing of your data is restricted so that data remains stored but is not further processed by us.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to your data being processed, if the processing is for a legitimate interest without compelling grounds, or for direct marketing.
- Right to judicial review: in the event that we were to refuse your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 4 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.4.1 above) in the processing of your personal data.

3.10 Can I find out the personal data that Focus Security Systems Limited hold about me?

At your request, we can confirm what information we hold about you and how it is processed. If we personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data
- Contact details of the Compliance Manager
The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Focus Security Systems Limited or a third party, information about those interests.
- The categories of personal data collected, stored and processed. Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

3.10.1 What forms of ID will I need to provide in order to access this?

Focus Security Systems Limited accepts the following forms of ID when information on your personal data is requested:

Passport, driving licence, birth certificate, utility bill (from last 3 months), etc.

4. Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Focus Security Systems Limited (or third parties as described in 3.4.1 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the Compliance Manager and the supervisory authority.

The details for each of these contacts are:

Compliance Manager:

Email: compliance.manager@focusonsecurity.com

Supervisory authority contact details

Jeff Rowell, Focus Security Systems Limited

3 Saxon House, Warley Street, Upminster, Essex RM14 3PJ

Tel: 0800 1832233



Information Commissioner's Office Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF
Tel: 03031231113

For any further detail regarding our GDPR processes and Personal Data we hold on you, please click [here](#), or contact the Compliance Manager.

Document Owner and Approval

The Compliance Manager is the owner of this document and responsible for ensuring that this policy document is reviewed via the internal audit and Management Review program. This Privacy Notice is approved by the Board of Directors.

A current version of this document is available to all members of staff on request.