



PRIME Security Services

## **Data Protection, Information Governance & Privacy Policy**

Prime security services is committed to protecting and respecting your privacy.

This Policy has been written in for compliance with the General Data Protection Act 2018 and to explain when and why we collect personal information about people who are employees or our clients or potential clients, how the Company uses it, the conditions under which we may disclose it to others and how we keep it secure. We are registered with the Information Commissioners Office (ICO) and our Registration No. is.

We may change this Policy from time to time so please check that you have the current version. If you are using our website, you're agreeing to be bound by this Policy.

Any questions regarding this Policy and our privacy practices should be sent by email to [helpdesk@primess.co.uk](mailto:helpdesk@primess.co.uk) or by writing to Kings Court, 17 School Road, Hall Green, Birmingham B28 8JG.

### **Who are we?**

[www.primess.co.uk](http://www.primess.co.uk)

### **How do we collect information from you?**

We obtain information about our:

- a) employees when they initially apply for positions in the Company and
- b) Clients when they make and initial enquiry for our services and ongoing through the term of the contract services provided.

### **What type of information is collected from you?**

The personal information we collect is usually limited to name, address, [helpdesk@primess.co.uk](mailto:helpdesk@primess.co.uk) In relation to our clients, this may also include keyholders for the systems.

### **How is this information used?**

We may use this information to:

- process an application for employment (including those required for pre-employment checks current at the time of application) and ongoing through employment for such as pensions, personal taxation and the like;
- process enquiries and orders from our clients;
- to carry out our obligations arising from any contracts entered into;
- dealing with system users and keyholders in relation to installed and maintained systems;
- seeking views or comments on the services we provide;
- notification of changes to our services;



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- Sending of information which has been requested and that may be of interest. This may include information about terms and conditions, system installations, maintenance & monitoring and the like.
- For the purposes of pre-employment checks (BS7858:2019).

We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our statutory or regulatory obligations (for example Security Screening Records are retained for term of employment plus 7 years, captured CCTV images 31 days unless required to be held for evidential evidence). We will hold your personal information on our systems for as long as is necessary for the relevant activity or as long as is set out in any relevant contract agreement.

### **Who has access to your information?**

We will not sell or impart client information to any third parties other than the emergency services or third party alarm receiving centres or in the case of employees for pensions, personal taxation and the like. **Legal disclosures.** We may, in appropriate cases, voluntarily or where required by law, pass your data to the Police and similar organisations such as law enforcement agencies (including fraud prevention and detection) or other governmental agencies.

We will never share information with third parties for marketing purposes.

### **Individual responsibilities**

Individuals are responsible for helping the organisation keep their personal data up to date. Individuals should let the organisation know if data provided to the organisation changes, for example if an individual moves house or changes his/her bank details.

Individuals may have access to the personal data of other individuals and of our customers and clients in the course of their employment, contract, volunteer period, internship or apprenticeship. Where this is the case, the organisation relies on individuals to help meet its data protection obligations to staff [and to customers and clients].

Individuals who have access to personal data are required:

- to access only data that they have authority to access and only for authorised purposes;
- not to disclose data except to individuals (whether inside or outside the organisation) who have appropriate authorisation;
- to keep data secure (for example by complying with rules on access to premises, computer access, including password protection, and secure file storage and destruction);
- not to remove personal data, or devices containing or that can be used to access personal data, from the organisation's premises



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without adopting appropriate security measures (such as encryption or password protection) to secure the data and the device;

- not to store personal data on local drives or on personal devices that are used for work purposes; and
- To report data breaches of which they become aware to [name of individual/the data protection officer] immediately.

Failing to observe these requirements may amount to a disciplinary offence, which will be dealt with under the organisation's disciplinary procedure. Significant or deliberate breaches of this policy, such as accessing employee or customer data without authorisation or a legitimate reason to do so, may constitute gross misconduct and could lead to dismissal without notice.

**Third Party Service Providers working on our behalf:** We may pass information to our third party service providers, agents subcontractors and other associated organisations for the purposes of completing tasks and providing services on our behalf (for example for Vetting & Screening purposes). However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep all information secure and not to use it for their own direct marketing purposes. Please be reassured that we will never release any information to third parties beyond the emergency services or approved sub-contractors for them to use for their own direct marketing purposes in any circumstance unless we are required to do so by law, for example, by a court order or for the purposes of prosecution or prevention of crime.

**Third Party Product Providers we work in association with:** Due to the nature of our business, we work closely with the emergency services. The emergency services will only use such details to provide information and carry out their obligations arising from any contract entered into with us. However, we take steps to ensure that everyone's privacy rights continue to be protected.

### **Your choices**

You will always have a choice about whether or not you wish to receive information from us. However, the Company does not undertake any direct marketing. We will not contact you for marketing purposes by email, phone or text. Should this change then this Policy will be updated to reflect this change.

### **How you can access and update your information**

The accuracy of your information is important to us. If you change email address, or any of the other information we hold is inaccurate or out of date, please email us at: [hr@primess.co.uk](mailto:hr@primess.co.uk)



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You have the right to ask for a copy of the information the Company holds about you (we may charge £10 for information requests to cover our costs in providing you with details of the information we hold about you).

In certain circumstances, such as where the data is no longer necessary for the purposes for which it was collected, you have a right to require us to erase all personal data held about you. **Note: There are a number of exemptions to this right, for example in relation to freedom of expression and compliance with legal obligations.**

### **Security precautions in place to protect the loss, misuse or alteration of your information**

When you give us personal information, we take steps to ensure that it's kept securely.

Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our IT Systems (soft copy information) or held securely in our offices (hard copy information).

**System users.** Where we have given you a password or passcode for identifying you as an authorised system user, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

### **Profiling**

We do not analyse your personal information to create a profile of your usage or any other such as interests and preferences so that we can contact you with information relevant to you.

We may make use of the information about you in order to provide you with information that directly affects you or in the case of system users, their system.

### **Use of 'cookies'**

Unlike many other websites, the Company website does not use cookies. Should this change then this Policy will be updated to reflect this change.

### **Links to other websites**

Our website may contain links to other websites run by other organisations. However, these are limited to our Certifications/Accreditations namely, SSAIB, and the like. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access these using links from our website.



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In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

### **18 or Under**

We are concerned to protect the privacy of children aged 18 or under (although under the GDPR this is currently the under 16's). If you are aged 18 or under, please get your parent/guardian's permission beforehand whenever you provide us with personal information.

### **Transferring your information outside of Europe**

As part of any application for employment or the services offered to you, the information which you provide to us may be transferred to countries outside the European Union ("EU").

These countries may not have similar data protection laws to the UK. By submitting your personal data, you're agreeing to this transfer, storing or processing. If we transfer your information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.

If you access our services while you are outside the EU, your information may be transferred outside the EU in order to provide you with those services.

### **Website recording**

At the time of publication of this Policy, our web site does not use the any web site recording service. Should this change then this Policy will be updated to reflect this change.

### **You're Rights under Data Protection Legislation**

You have various rights under data protection legislation:

- (a) Your right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.
- (b) You're right to correct any errors in the information we hold about you, and to change and correct any details you have already given us. Please inform us about any changes to your details so that we can keep our records accurate and up to date.
- (c) You're right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data.



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You can also exercise the right at any time by emailing us at: [helpdesk@primess.co.uk](mailto:helpdesk@primess.co.uk) or by writing to us Kings Court, 17 School Road, Hall Green, Birmingham B28 8JG

## **Training**

The organisation will provide training to all individuals about their data protection responsibilities as part of the induction process and at regular intervals thereafter.

Individuals whose roles require regular access to personal data, or who are responsible for implementing this policy or responding to subject access requests under this policy, will receive additional training to help them understand their duties and how to comply with them

## **Review of this Policy**

We keep this Policy under regular review. This Policy was last updated as per the date below.

The spoke for the company is **IRFAN SHAFIQ**.