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## Scope

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

## Responsibilities

- 1.1 The Data Protection Controller is responsible for ensuring that this notice is made available to data subjects prior to 1st Reaction Security Limited collecting/processing their personal data.
- 1.2 All Employees/Staff of 1st Reaction Security 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.

## Privacy notice

### 2.0 Who are we?

*1st Reaction Security Limited provide the full spectrum of manned and electronic security services.*

Our GDPR Controller, Claire Smeathers can be contacted directly here:

- [dpcontroller@1st-reaction.co.uk](mailto:dpcontroller@1st-reaction.co.uk)
- 01536 512999

The personal data we would like to collect and process from you is:

<b>Personal data type:</b>	<b>Source</b> (where 1st Reaction Security Limited obtained the personal data from if it has not been collected directly from you, the data subject. Note if the personal data has been accessed from publicly accessible sources):
<b>Customers</b>	
Your name	To provide you with relevant information
Your company details	To provide you with relevant information
Your email address	To provide you with relevant information ensuring it’s relevant, useful and timely.
Your location	To provide you with relevant information
Your job title	To provide you with relevant information
Your Mobile Number	To provide emergency and routine contact
All of the above for any other nominated persons within your business that you want us to communicate with for reasons designated by yourself	All of the Above



The personal data we collect will be used for the following purposes:

- Contractual Obligations & Contact.
- Providing Quotations at the request of the enquirer.
- Formal Vetting, Payroll and Emergency Contact functions.

Our legal basis for processing for the personal data:

- necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation). Legal Obligations.

Any legitimate interests pursued by us, or third parties we use, are as follows:

- Meeting our Contractual Obligations
- Responding to enquiries and messages we receive and keeping records of correspondence.
- Meeting our Regulatory & Statutory Requirements.

The special categories of personal data concerned are:

- Health Data - Employees

## 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 1st Reaction Security Limited to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

You may withdraw consent at any time by *emailing our Data Controller at* [dpcontroller@1st-reaction.co.uk](mailto:dpcontroller@1st-reaction.co.uk)

## Disclosure

1st Reaction Security Limited *will not* pass on your personal data to third parties *without first obtaining your consent.*

## Retention period

1st Reaction Security Limited will process personal data for *the length of our contract of service or employment contract remains active* and will store the personal data for 5 years after the conclusion of the service or employment in line with the relevant British and European Standards that as an NSI Guarding Gold, NSI NACOSS Gold, NSI BAFE Gold and SIA Approved Contractor we are required to adhere to.



## 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:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- 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 certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that 1st Reaction Security Limited refuses 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 3.6 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.4 above) in the processing of your personal data.

## Complaints

In the event that you wish to make a complaint about how your personal data is being processed by 1st Reaction Security Limited (or third parties as described in 3.4 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and 1st Reaction Security Limited's data protection representatives Data Protection Controller.

The details for each of these contacts are:

	<b>Supervisory authority contact details</b>	<b>Data Protection Controller contact details</b>
Contact Name:	Information Commissioners Office	Claire Smeathers
Address line 1:		1 <sup>st</sup> Reaction Security Limited
Address line 2:		Unit 4 Linnell Way
Address line 3:		Telford Way Industrial Estate



Address line 4:		Kettering
Address line 5:		Northants, NN16 8PT
Email:	<a href="https://ico.org.uk/make-a-complaint/">https://ico.org.uk/make-a-complaint/</a>	dprcontroller@1st-reaction.co.uk
Telephone:	0303 123 1113	01536 512999

## Privacy statement

Read more about how and why we use your data in document

## Online privacy statement

### 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”.

### How we use your information

This privacy notice tells you how we, 1st Reaction Security Limited, will collect and use your personal data for administrative and business purposes (particularly to contact you to improve our business and website, to advertise our services, to analyse your use of our website, and in connection with our legal rights and obligations.

### Why does 1st Reaction Security Limited need to collect and store personal data?

In order for us to provide you *with a service or employment* we need to collect personal data for *correspondence purposes and 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.

In terms of being contacted for marketing purposes 1st Reaction Security Limited would contact you for additional consent.



Will 1st Reaction Security Limited share my personal data with anyone else?

We may pass your personal data on to third-party service providers (The Security Industry Authority and the National Security Inspectorate contracted to 1st Reaction Security 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 *ensure our accreditation requirements are being met*. When they no longer need your data to fulfil this service, they will dispose of the details in line with 1st Reaction Security Limited's procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

How will 1st Reaction Security Limited use the personal data it collects about me?

1st Reaction Security 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. 1st Reaction Security Limited is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. 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.

Under what circumstances will 1st Reaction Security 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.

Can I find out the personal data that the organisation holds about me?

1st Reaction Security Limited at your request, can confirm what information we hold about you and how it is processed. If 1st Reaction Security Limited does hold 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. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of 1st Reaction Security 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.

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

1st Reaction Security Limited accepts the following forms of ID when information on your personal data is requested:

- *Passport*
- *Driving Licence*
- *Birth Certificate*
- *SIA Licence*

Contact details of the Data Protection Controller:

	<b>Data Protection Officer / GDPR Owner contact details</b>
Contact Name:	Claire Smeathers
Address line 1:	1 <sup>st</sup> Reaction Security Limited
Address line 2:	Unit 4 Linnell Way
Address line 3:	Telford Way Industrial Estate
Address line 4:	Kettering
Address line 5:	Northants, NN16 8PT
Email:	dprcontroller@1st-reaction.co.uk
Telephone:	01536 512999





## Document Owner and Approval

The Data Protection Controller is the owner of this document and is responsible for ensuring that this procedure is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to *all* members of staff on the and is published on our website, [www.1st-reaction.co.uk](http://www.1st-reaction.co.uk).

This procedure was approved by the Managing Director and is issued Friday 25<sup>th</sup> May 2018 on a version controlled basis under his signature.

Signature: W. Southern .

Date: Friday 25<sup>th</sup> May 2018