

# VIP SECURITY (ESSEX) LTD POLICY DOCUMENT

## DATA PROTECTION



Strictly Private & Confidential

This document remains the property  
of VIP Security (Essex) Ltd.

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## Data Protection Policy

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### DEFINITIONS

In this policy, the following terms have the following meanings:

**“The Company”**

VIP SECURITY (ESSEX) LTD

**“Employees”**

All employees including agencies and sub-contractors employed to work on behalf of The Company

**“Client”**

a person or organization using the services of The Company

**“Consent”**

means any freely given, specific, informed and unambiguous indication of an individual’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her

**“Data Controller”**

means an individual or organisation which, alone or jointly with others, determines the purposes and means of the processing of personal data



## INTRODUCTION

The Company website is owned by VIP Security (Essex) Ltd and is hosted by KEY ELEMENTS, which is maintained by CLIMBING TREES.

The Company Email is Maintained by VIP SECURITY (Essex) LTD and DR ADEPT

PARiM is a management and employee portal

Climbing trees, Key Elements, Dr Adept and PARiM are compliant to GDPR. These are responsible for the storage of all Data and Cookies, these are deleted when no longer required.

The Company is committed to safeguarding the privacy of our service users.

This policy applies where we are acting as a data controller with respect to the personal data of our service users and Employees; in other words, where we determine the purposes and means of the processing of that personal data.

## PERSONAL DATA

### Keeping and processing Personal Data

The legal basis for processing all data is consent or our legitimate interests, namely the proper administration of our business or the performance of a contract between you and The Company and/or taking steps, at your request, to enter into such a contract.

The purpose of which is to have no or little impact on your privacy.

Employees will have the access to their personal data through PARiM and are able to delete or amend personal data held on them in accordance to this policy

**Personal data** may include. But not exclusive to;

- your name
- address
- telephone number
- email address
- profile pictures
- gender
- date of birth
- relationship status
- interests and hobbies
- educational details
- employment details

The Company may process your personal data that is provided in the course of the use of our services

The Company may process your personal data that is provided during the course of employment

The Company may process information that you post for publication on our website or through our services or any form of social media



## ENQUIRY DATA

The Company may process information contained in any enquiry (**Enquiry Data**) you submit to us regarding goods or services

## CUSTOMER RELATION DATA

The Company may process information relating to our customer relationships, including customer contact information

The **customer relationship data** may include, But not exclusive to;

- your name
- your employer
- your job title or role
- your contact details
- information contained in communications between us and you or your employer

The source of the customer relationship data is you or your employer. The customer relationship data may be processed for the purposes of managing our relationships with customers, communicating with customers, keeping records of those communications and promoting our products and services to customers

## TRANSACTION DATA

The Company may process information relating to transactions, including purchases of goods and services, that you enter into with us and/or through our website

The **transaction data** may include, But not exclusive to;

- your contact details
- your card details
- the transaction details.

The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions.



## CORRESPONDENCE DATA

The Company may process information contained in or relating to any communication that you send to us

**Correspondence Data** may include, But not exclusive to;

- the communication contents

The correspondence data may be processed for the purposes of communicating with you and record-keeping.

The Company may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

The Company may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.

In addition to these specific purposes for which we may process your personal data already mentioned, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

Please do not supply any other person's personal data to us, unless we prompt you to do so, in accordance with this policy

## PROVIDING YOUR PERSONAL DATA TO OTHERS

The Company may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure].

The Company may disclose your enquiry data to one or more of those selected third party suppliers of goods and services identified on our website for the purpose of enabling them to contact you so that they can offer, market and sell to you, relevant goods and/or services.

Each such third party will act as a data controller in relation to the enquiry data that we supply to it; and upon contacting you, each such third party will supply to you a copy of its own privacy policy, which will govern that third party's use of your personal data.

Financial transactions relating to our website and services may be handled by our payment services providers, The Company will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds.

In addition to these specific disclosures of data, The Company we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

The Company may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.



## **INTERNATIONAL TRANSFERS OF YOUR PERSONAL DATA**

The Company will not transfer Personal Data to a country outside the European Economic Area, unless that country has equivalent levels of protection for personal data, except in specified circumstances.

## **RETAINING AND DELETING PERSONAL DATA**

The Company data retention policy and procedure are designed to help ensure that it complies with our legal obligations in relation to the retention and deletion of personal data.

Personal data that The Company process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

The Company will retain your personal data for no longer than necessary for the purpose,

In some cases, it is not possible for us to specify in advance the periods for which your personal data will be retained.

The Company may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## **Storing Data**

All data supplied is stored;

- In paper form that is kept in locked filing cabinets with limited access
- On an office based server which is password protected with limited access
- On cloud-based storage SPIDER OAK that is password protected with limited access

## **AMENDMENTS**

The Company may update this policy from time to time when necessary.

The Company may notify you of any significant changes to this policy by email. Please read carefully to ensure you are happy with any changes to this policy.



## YOUR RIGHTS

The Company have summarised the rights that you have under the data protection Act 1998 (or its successor) and the EU General Data Protection Regulation (together the “Data Protection Laws”).

Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

Your principal rights under data protection law are:

- the right to access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to object to processing;
- the right to data portability;
- the right to complain to a supervisory authority; and
- the right to withdraw consent.

You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed
- You withdraw consent to consent-based processing
- you object to the processing under certain rules of applicable data protection law
- the processing is for direct marketing purposes
- the personal data have been unlawfully processed

However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary:

- for compliance with a legal obligation
- for the establishment, exercise or defence of legal claims.

In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are:

- you contest the accuracy of the personal data
- processing is unlawful but you oppose erasure
- The Company no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims
- you have objected to processing, pending the verification of that objection.

Where processing has been restricted on this basis, The Company may continue to store your personal data. However, The Company will only otherwise process it:

- with your consent; for the establishment, exercise or defence of legal claims
- for the protection of the rights of another natural or legal person
- for reasons of important public interest.



You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us **or**, the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

To the extent that the legal basis for our processing of your personal data is:

- consent
- or,**
- that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract,

and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection (ICO). You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal. You may exercise any of your rights in relation to your personal data by written notice to us





## OUR DETAILS

The Company Website:

- is owned by **VIP SECURITY (ESSEX) LTD**
- is managed by **KEY ELEMENT**
- is operated by **CLIMBING TREES.**

The Company Email:

- Is owned by **VIP SECURITY (ESSEX) LTD**
- Is managed by **DR ADEPT**
- Servers are based in **East London**

The Company Is registered in England and Wales under registration number **07940645**

The Company registered office is at:

**CAMBRIDGE HOUSE,  
CAMBRIDGE PARK,  
WANSTEAD,  
LONDON.E11 2PU.**

The Company principal place of business is at

**SECURITY HOUSE,  
4 STATION COURT,  
WICKFORD,  
ESSEX. SS117AT**

You can contact us:

- (a) by post, to the postal address given above
- (b) using our website **www.vipsec.at** contact form
- (c) by telephone, on 01268 526112 or
- (d) by email, using **info@vipsec.at**.