



## PRIVACY POLICY

### PRIVACY NOTICE

GSD Security Limited is a company registered in England and Wales (hereinafter referred to as "We", "Our" or "Us").

### OVERVIEW

Maintaining the security of your data is of paramount importance to us and we are committed to respecting your privacy rights.

This notice, which including without limitation applies when using the services of: GSD Security Limited and provides you with information about:

- How we use your data
- What personal data we collect
- Who we share your data with
- How we ensure your privacy is maintained; and
- Your rights relating to your personal data

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the General Data Protection Regulation (EU Regulation 2016/679, when applicable, the "GDPR"), and the EU Data Protection Directive (Directive 95/46/EC), the data controller is GSD Security Limited of 1 Riviere Towans, Phillack, Hayle, Cornwall. TR27 5AF

### INFORMATION WE MAY COLLECT FROM YOU AND OTHER SOURCES

Although the precise details of the personal information collected will vary according to the specific purpose for which we are collecting the information, we may collect and process the following data about you:

Information that you provide to us. This includes information provided at the time of 1<sup>st</sup> contact, subscribing to our services, purchasing goods, posting material or requesting further services. We may also ask you for information when you report a problem with our services. If you contact us by phone, email or otherwise and information is provided voluntarily, we may keep a record of that correspondence.

Please note that we may record and monitor telephone conversations that we have with you. The sole purpose of any recording is for training and quality control purposes. Under the GDPR any personal or confidential information disclosed shall not be made available to any third party (unless required by law to do so) or used for marketing purposes. Recorded conversations are deleted within three months after the recording was made.

We may also ask you to complete surveys that we use for Quality purposes, although you do not have to respond to them.

Details of transactions to facilitate the fulfilment of your orders and to provide the relevant services in an accurate manner;

### **USES MADE OF THE INFORMATION**

We use information held about you in the following ways:

- To ensure that our services are delivered in the most effective manner for you and for your business.
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- To carry out our obligations arising from any contracts entered into between you and us. For example, we pass your contact details to our officers, who may contact you via phone or SMS to confirm details relating to service delivery.
- To allow you to participate in interactive features of our service, when you choose to do so.
- To enhance your experience whilst using our services.
- To notify you about changes to our service.
- If you are an existing customer, we will only contact you with information about ongoing jobs and goods and/or services that we offer.
- If you are a new customer, we will contact you by electronic means if you have consented to this.
- We may use your personal information to contact you if there is any urgent safety or operational circumstances information to communicate to you where we otherwise reasonably believe that the processing of your personal information will prevent or reduce any personal harm to you. It is in your vital interests for us to use your personal information in this way.

### **DISCLOSURE OF YOUR INFORMATION**

In order to make certain services available to you, we may need to share your personal data with third parties.



**SECURITY WITH ADDED BITE**



- We may disclose your personal information to:
- our trusted service providers acting on our behalf who provide services such as; infrastructure provision, auditing services and other services to enable them to provide services;
- Our officers who deliver your services;
- Selected third parties if you are a new customer and you have consented to this;
- If GSD Security Limited substantially sell all of its assets or are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use or terms and conditions of supply and other agreements; or to protect the rights, property, or safety of GSD Security Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## **INTERNATIONAL TRANSFERS**

It is sometimes necessary for us to share your data outside of the European Economic Area (EEA). This generally occurs when our service providers are located outside of the EEA or you are based outside of the EEA.

If this happens, we will ensure that the transfer will be compliant with the relevant data protections laws including the GDPR.

Our standard practice is to use standard contractual clauses which have been approved by the European Commission for such transfers. Those clauses can be accessed at

[https://ec.europa.eu/info/law/law-topic/data-protection\\_en](https://ec.europa.eu/info/law/law-topic/data-protection_en).

Where standard contractual clauses are not used and your data is transferred to the United States, we will ensure that the service providers have signed up to the EU-US Privacy Shield which is a framework designed to protect the fundamental rights of anyone in the EU whose personal data is transferred to the United States for

## **THIRD-PARTY LINKS ON OUR WEBSITE**

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **HOW DO WE PROTECT YOUR DATA**

We are committed to keeping your data safe and secure and employ a number of security measures such as:

- All information you provide to us is stored on our secure servers.
- We use reasonable, organisational, technical and administrative measures to protect personal information under our control. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to us via e-mail; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## **LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA**

The personal data that you provide to us in order to purchase services is processed as it is necessary for the performance of a contract with you.

All other personal data is processed for our legitimate interests (as set out below) and to comply with our legal obligations.

In general, we only rely on consent:

- to send direct marketing communications to customers via email or text message
- to contact (and allow for selected third parties to contact) new customers by electronic means.

You have the right to withdraw your consent at any time.

## **OUR LEGITIMATE INTERESTS**

The normal legal basis for processing customer data, is that it is necessary for our legitimate interests including:-

- selling and supplying goods and services to our customers;
- protecting customers, employees and other individuals and maintaining their safety, health and welfare;
- promoting, marketing and advertising our products and services;
- sending promotional communications which are relevant and tailored to individual customers;
- understanding our customers' behaviour, activities, preferences, and needs;



**SECURITY WITH ADDED BITE**



- complying with our legal and regulatory obligations;
- preventing, investigating and detecting crime, fraud or anti-social behaviour and prosecuting offenders, including working with law enforcement agencies;
- handling customer contacts, queries, complaints or disputes;
- managing insurance claims by customers;
- protecting us and our employees and customers, by taking appropriate legal action against third parties who have committed criminal acts or are in breach of legal obligations to us;
- effectively handling any legal claims or regulatory enforcement actions taken against us; and
- fulfilling our duties to our customers, colleagues, shareholders and other stakeholders.

## **YOUR RIGHTS**

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 not to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that we 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 below in the "Contact" section.

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



**ACTION  
COUNTERS  
TERRORISM**

**SECURITY WITH ADDED BITE**



You can also exercise the right at any time by contacting us at **GSD Security Limited** by any of the means outlined below.

Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

### **HOW LONG DO WE KEEP YOUR DATA?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Our procedures to manage data retention is to retain customer data for 7 years to support and evidence service provision.

Data back-ups can take up to 60 days to remove specific data from the system

We will take reasonable steps under Article 17 of the GDPR to meet data subject requests.

### **CHANGES TO OUR PRIVACY NOTICE**

Any changes we may make to our privacy notice in the future will be posted on our website and, where appropriate, notified to you by e-mail.

### **CONTACT**

If you have any questions about how we use your personal data that are not answered here, or if you want to exercise your rights regarding your personal data, please contact us by any of the following means:

- Email us on: [gsdsecurity@btconnect.com](mailto:gsdsecurity@btconnect.com)
- Write to us at: GSD Security Limited, 1 Riviere Towans, Phillack, Hayle, Cornwall TR27 5AF

You have the right to make a complaint at any time to the local data protection supervisory authority which, for the UK, is the Information Commissioner's Office (ICO ([www.ico.org.uk](http://www.ico.org.uk))). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.



**SECURITY WITH ADDED BITE**



**Issue Date: 24 April 2018**

**Reviewed: March 2019, March 2020, Feb 2021, Feb 2022, Jan 2023,  
Feb 2024**

## **REFERENCES**

### ***GDPR Rights for Citizens***

[https://ec.europa.eu/info/law/law-topic/data-protection/reform/rights-citizens\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/reform/rights-citizens_en)

### ***GDPR Rules for Businesses and Organisations***

[https://ec.europa.eu/info/law/law-topic/data-protection/reform/rules-business-andorganisations\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/reform/rules-business-andorganisations_en)

### ***GDPR Definition of Personal Data***

[https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-personal-data\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-personal-data_en)

### ***What does General Data Protection (GDPR) Govern?***

[https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-does-generaldata-protection-regulation-gdpr-govern\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-does-generaldata-protection-regulation-gdpr-govern_en)

### ***What constitutes Data Processing?***

[https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-constitutes-dataprocessing\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-constitutes-dataprocessing_en)

### ***What are Data Protection Authorities?***

[https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-are-dataprotection-authorities-dpas\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-are-dataprotection-authorities-dpas_en)



**SECURITY WITH ADDED BITE**

