



ELECTRONIC & SECURITY SERVICES

GDPR: DATA PRIVACY NOTICE FOR CLIENTS AND SUPPLIERS

Introduction

ESS Ltd are committed to protecting and respecting your privacy.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulation (the “GDPR”).

1. Definitions

Data controller - A controller determines the purposes and means of processing personal data.

Data processor - A processor is responsible for processing personal data on behalf of a controller.

Data subject – Natural person

Categories of data: Personal data and special categories of personal data

Personal data - The GDPR applies to ‘personal data’ meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

Special categories personal data - The GDPR refers to sensitive personal data as ‘special categories of personal data’ (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

2. Who are we?

ESS Ltd is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are: 50 Boucher Place, Belfast, BT12 6HT. For all data matters contact our data protection officer on 02890663510 / DPO@ess-security.co.uk

3. The purpose(s) of processing your personal data

We use your personal data for the following purposes:

- To provide our services to you
- To contact you about our services
- To maintain our own accounts and records

4. The categories of personal data concerned

With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

- Name & address
- Email address
- Phone numbers
- Keyholder names and numbers (if applicable)
- Financial/account information for direct debits or standing orders (if applicable)
- Recorded audio of telephone conversations (where applicable)
- Recorded video footage from CCTV cameras (where applicable)

5. What is our legal basis for processing your personal data?

Our lawful basis for processing your general personal data will include at least one of the following:

<input type="checkbox"/> Consent of the data subject	From our GDPR compliant consent form
<input type="checkbox"/> Processing necessary for the performance of a contract with the data subject or to take steps to enter into a contract	e.g. Installation, maintenance, monitoring or response of our services.
<input type="checkbox"/> Processing necessary for compliance with a legal obligation	Financial, invoicing, keyholder/PSNI response.
<input type="checkbox"/> Processing necessary to protect the vital interests of a data subject or another person	To provide electronic security or fire alarm services

More information on lawful processing can be found on the [ICO website](#).

6. Sharing your personal data

Your personal data will be treated as strictly confidential, and will be shared with ESS employees to facilitate us in providing our services to you.

All ESS employees are vetted and have undergone security screening in line with BS:7858.

Where necessary and in order to provide the required services (examples include but are not limited to monitoring, keyholding or police response) your contact details may be shared with specific third parties, such as our alarm receiving centre or emergency services, to enable the provision of our service.

7. How long do we keep your personal data?

We keep your personal data while either a contract exists or while you continue to use our services on an ongoing basis plus a further 6 years in case of any legal claims, complaints or technical requests for information on any of the services we have provided.

8. Providing us with your personal data

You are under no statutory or contractual requirement or obligation to provide us with your personal data. But failure to do so may prevent us from providing any of our services to you.

9. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

10. Transfer of Data Abroad

We do not transfer personal data outside the EEA.

11. Automated Decision Making

We do not use any form of automated decision making in our business.

12. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

13. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on our webpage and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

14. How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact our Data Protection Officer on 028 90663510 / DPO@ess-security.co.uk

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email/) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.