Optiwatch Ltd (hereinafter known as the Company) is committed to protecting and respecting your privacy.

This Policy has been written in for compliance with the General Data Protection Regulation (GDPR) 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 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: info @optiwatchgroup.com or by writing to us at:

Optiwatch Ltd

Att. To Appointed Compliance Officer Unit 5, Martinbridge Trading Estate, Lincoln Road, Enfield, EN1 1SP

Tel: 020 8443 0077

DATA PROTECTION PRINCIPLES

Under GDPR, all personal data obtained and held by us will be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing will be fair, lawful and transparent
- b) data be collected for specific, explicit, and legitimate purposes
- c) data collected will be adequate, relevant and limited to what is necessary for the purposes of processing
- d) data will be kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- e) data is not kept for longer than is necessary for its given purpose
- f) data will be processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- g) we will comply with the relevant GDPR procedures for international transferring of personal data

TYPES OF DATA HELD

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.

The personal information we collect is usually limited to name, address, email address, contact telephone number(s). In relation to our clients, this may also include keyholders for the systems.

LAWFUL BASES OF PROCESSING DATA

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 legal 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;
- 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.

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.

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 RIGHTS IN RELATION TO YOUR DATA

You will always have a choice about whether or not you wish to receive information from us. However, for marketing purposes if you decide to opt out then we will not be contacting you for any marketing purposes by email, phone or text. Should this change then this Policy will be updated to reflect this change.

All employees should refer to the policy on your rights in relation to your data.

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: faith@optiwatchgroup.com or by writing to us at:

Optiwatch Ltd

Unit 5, Martinbridge Trading Estate, Lincoln Road, Enfield, EN1 1SP

You have the right to ask for a copy of the information the Company holds about you in line with our subject access request policy.

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 and will take appropriate measures to maintain the company's commitment to protecting your data. 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, CCAS, 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.

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.

INTERNATIONAL DATA TRANSFERS

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.

Your 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.
- (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. You can also exercise the right at any time by emailing us at: faith@optiwatchgroup.com or by writing to us at:

Optiwatch Ltd

Unit 5, Martinbridge Trading Estate, Lincoln Road, Enfield, EN1 1SP Tel no. 020 8443 0077

Review of this Policy

Theger

We keep this Policy under regular review. This Policy was last updated in May 2018. 21/5/2018

Tim Chege

Appointed compliance officer

Tel no. 020 8443 0077

Review Date 21/05/2019