

Privacy Notice

Approved & authorised by Ashley Budworth – Director

Date Published: September 2023 Version: 1

 ${\it Contact for enquiries to this policy: Kelly Ventham } {\it Email: $\underline{kelly@absecurity solutions.co.uk}$}$



BACKGROUND:

AB Security Solutions understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our customers and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1. Information About Us

AB Security Solutions.

Limited Company

registered in England under company number 13433891.

Registered address: 66-68 Oswald Road, Scunthorpe, England, DN15 7PG.
Main trading address: 66-68 Oswald Road, Scunthorpe, England, DN15 7PG.

VAT number 389 3917 34

Data Protection Officer: Kelly Ventham.

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Telephone number: 07966 025755.

Postal address: 66-68 Oswald Road, Scunthorpe, England, DN15 7PG.

Representative: Kelly Ventham.

Email address: kelly@absecuritysolutions.co.uk.

Telephone number: 07966 025755.

Postal address: 66-68 Oswald Road, Scunthorpe, England, DN15 7PG.

We are a member of ICO, registration number ZB228131

2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What Is Personal Data?

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.



Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

4. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- Rights relating to automated decision-making and profiling. Part 6 explains more about how we use your personal data, including automated decisionmaking and profiling.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information



Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 11.

5. What Personal Data Do You Collect and How?

We may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. We do not collect any 'special category' or 'sensitive' personal data and personal data relating to children data relating to criminal convictions and/or offences.

Data Collected	How We Collect the Data
Personal information: your name, proof of identity, copy of driving licence (if applicable) copy of passport	Emailed or sent to us via our encrypted mobile messenger.
Contact information including address, telephone number, email address, emergency contact information.	Sent to us via you on email or WhatsApp
Professional data: to include a copy of your SIA badge, a recent selfie with the badge to validate this is your own card. Permit to work in the UK, Student timetable for those with restricted hours of work.	Sent to us via WhatsApp or email.
Payment details: We require your bank details to make payment into your bank – we do not accept the bank details of any third party.	Provided to us via Email
Profile information; include skills, and work experience, this may include additional qualifications you hold that may be suited to your position within the company.	Volunteered information by you, send via email.
To include any special needs you may have or adaptations required in order for you to carry out your work duties. To disclose any medical	



conditions that may cause a danger to yourself or others in the workplace. This could include any prescribed medication you are taking.	
Data from third parties including a reference from previous employers or character references from professional members.	Contact details to be shared by you and the company to contact the third party.

6. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we may use your personal data, and our lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Basis
Administering our business and verifying the authenticity of the applicant/subcontractor.	Data provided by you: Name, SIA Badge Number, BRP Codes where applicable, DVLA data where applicable. For businesses, we require company registration number, VAT registration number (if applicable)	To establish the legitimacy of the data provided, we conduct checks using the Government official websites to validate your application. This has to be completed and approved ahead of any work.
Supplying our services to you.	In order to provide our services, we require details of the venue, address, risk involved, contact telephone numbers, and name of primary contact.	We retain information that is valid, up to date and accurate. Once a task has been completed we are not at liberty to retain this information as it becomes obsolete.
Managing payments for our services.	Company information provided by the company. This includes the contact details and telephone numbers we hold on file.	We use a third party company to conduct credit checks on all business partnerships. For further information on this company please contact kelly@absecuritysolutions.co.uk Debt collection companies may be used to outsource bad-debt

AB Security Solution LTD



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	We disclose our bank details on each invoice and would notify of any changes in writing.	where your data shall be shared where payment has not been satisfied.
Communicating with you.	We will use your telephone or email address as our primary communication method. We also use C247 platform which shall send push notifications to your mobile for new tasks and instructions. We operate via Xero an accounting software provider. Emails are automatically populated via Xero and sent to the designated contact via email.	Communication is only ever clear information that is relevant to you. We do not conduct marketing campaigns and as such the choice to receive tasks are open to change at any time. B2B communication remains in place whilst there are monies owed and an existing relationship in place.
Supplying you with information by email	You have the option at anytime outside of our contractual obligations to opt out of receiving emails from us. The account would need to be fully satisfied before we have the facility to close communications. To opt out, you would need to email kelly@absecuritysolutions.co.uk	Email kelly@absecuritysolutions.co.uk with any opt out requests.

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, telephone and text message with information, news, and offers on our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

We use the following automated system for carrying out certain kinds of decision-making and profiling. If at any point you wish to query any action that we take on the



basis of this or wish to request 'human intervention' (i.e. have someone review the action themselves, rather than relying only on the automated method), the Data Protection Legislation gives you the right to do so. Please contact us to find out more using the details in Part 11.

- The following automated decision-making method(s) may be used:
 - SIA checks and identity verification
 - o Permission to work in the UK
 - o Credit checks for companies on account outside of 7 days
- The following automated profiling may take place:
 - To ensure you are able to work legally in the UK, your information shall be used to validate your application via the government website.
 - Ongoing monitoring and automated checks on the SIA website to notify of expired or revoked licenses. You should also volunteer this information immediately.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 11.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long We Keep It
Identity Information including. Eg Name, telephone number, SIA badge	No fixed period, we shall hold data whether you work for us at present or not to allow open dialogue should future opportunities arise. You can opt-out of this facility when you no longer work for the company.

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Contact information including telephone number, address, email address	No fixed period, we shall hold data whether you work for us at present or not to allow open dialogue should future opportunities arise. You can opt-out of this facility when you no longer work for the company.
Business information including business name, company reg number, VAT registration number, title and profession	No fixed period, we shall hold data whether we have an existing working relationship with you at present or not to allow open dialogue should future opportunities arise. You can opt-out of this facility when you no longer work for the company. Company history sits within Xero for 7 years after our last transaction before it is archived.
Payment information including bank account details	No fixed period, we shall hold data whether you work for us at present or not to allow open dialogue should future opportunities arise. You can opt-out of this facility when you no longer work for the company.

8. How and Where Do You Store or Transfer My Personal Data?

We will only store your personal data or store some of your personal data in the UK. This means that it will be fully protected under the Data Protection Legislation.

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We will only store your personal data or store some of your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the EU GDPR and/or to equivalent standards by law. Transfers of personal data to the EEA from the UK are permitted without additional safeguards.

OR

We may store some or all of your personal data in countries outside of the UK. These are known as "third countries". We will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation as follows:

We ensure that your personal data is protected under binding corporate rules. Binding corporate rules are a set of common rules which all our group companies are required to follow when processing personal data. For further information, please refer to the Information Commissioner's Office.



OR

We will only store or transfer personal data in or to countries that are deemed to provide an adequate level of protection for personal data. For further information about adequacy decisions and adequacy regulations, please refer to the Information Commissioner's Office.]

9. Do You Share My Personal Data?

We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

We are also required to share your name, telephone number and SIA licence number to our clients whom we represent at venues within the UK, this is a legal stipulation and governed by the SIA in many cases. We only share data that is essential to the task. Where additional data is requested, this is always shared and granted by the individual before data is transferred.

We may share your personal data with other companies in our group as AB Security Solutions Ltd is part of Tutam Group Holdings LTD. This includes subsidiaries and our holding company and its subsidiaries.

We may sometimes contract with the following third parties to supply services.

Recipient	Activity Carried Out	Sector	Location
Data Processor: C247	Security Tasks are recorded, monitored and GPS monitored 24/7. Push notifications via mobile app.	Security	National
Data Processor/handler: Xero Accounting Software	Processing of invoices, directory of information, credit management	Accounts	National



Data Processor:	Invoices, tax returns	Accounts	National
Forrester Boyd	and company		
Accountants	accounts.		

If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8.

If any personal data is transferred outside of the UK, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in Part 8.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

10. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 10 working day and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

11. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:



for the attention of Kelly Ventham:

Email address: Kelly@absecuritysoultions.co.uk.

Telephone number: 07966025755.

Postal Address: 66-68 Oswald Road, Scunthorpe, England, DN15 7PG.

12. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available on our website $\underline{www.absecuritysolutions.co.uk}$. This Privacy Notice was last updated September 2023

Approved by:

Director