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<i>Approved</i>	MD

## Privacy Notice for Counter Security Services Limited

Counter Security Services Limited provides manned security services to commercial properties throughout the UK. Our company registration number is 10501955. Our registered office is at Suite 4.1 Universal Square, Devonshire Street North, Manchester, M12 6JH. The provision of our services and the processing of personal information are within the EU and the provisions of the General Data Protection Regulation.

Counter Security Services Limited is committed to safeguarding the privacy of our customers, our staff and others we engage with, where personal information is required for legitimate means. This privacy notice, together with the policies and processes referred in it, sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

Counter Security Services Limited is a “Data Controller,” which means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information we hold on you.

### What information do we collect?

You supply personal data that includes your name, address, other identifiers, necessary to completing a contract, for meeting legal obligations, for legitimate purposes and where appropriate when consent has been obtained. We hold this information to enable us to comply with statutory obligations and to pursue our legitimate interests for the purposes set out in the section below.

### How do we use your personal data?

We may use your personal data to:

- Set up officer and customer portfolios for deployment purposes;
- Comply with our statutory and regulatory obligations;
- Meet the requirements of British and International standards;
- Deal with enquiries, requests and other communications made by you relating to service delivery.

If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so or request your consent to do so.

## Disclosing your personal data to others

We will not share your personal data with others, unless:

- We are under a duty to disclose or share your personal details to comply with any legal obligation or in order to enforce or apply our rules for legitimate purposes;
- Our business enters a joint venture with, or is sold to or merged with another business, we may then share your personal details with our new business partners or owners.

## Where we store your personal data

We store all your personal details on a secure server within the European Economic area.

## How long do we keep your personal data for?

We only keep your personal data for as long as is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means and the applicable legal requirements.

## How secure is the data?

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a legitimate business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## Your rights

Under certain circumstances, by law you have the right to:

Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your situation, which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

Request the transfer of your personal information to another party. If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please write to us at Counter Security Services, Suite 4.1 Universal Square, Devonshire Street North, Manchester, M12 6JH.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

## Your right to complain

If you have any problems with the way that we are handling your personal data, you should contact the Information Commissioner’s Officer (ICO). The ICO can be contacted by telephone on 0303 123 113 – Monday to Friday, between 9am and 5pm or by email

at [casework@ico.org.uk](mailto:casework@ico.org.uk). You can also visit the ICO's website by following this link: <https://ico.org.uk/>.

## Changes to our privacy policy

We keep our privacy policy under regular review and any updates are posted on our site. This privacy policy was last updated on 16<sup>th</sup> November 2018.

## Data Controller

The data controller responsible for your personal data is Counter Security Services Limited (Company Number 10501955) Our data protection registration number is ZA370199. If you have any questions about this privacy notice or how we handle your personal information, please contact our Operations Team on 0161 974 6527 or via email @ [control@countersecurity.co.uk](mailto:control@countersecurity.co.uk)