<u>Saffron Security Ltd Privacy Policy – Last reviewed May 2018</u>

We are Saffron Security Ltd, registered company number 5692767 ("we", "us", "our" or "Saffron Security"). Our registered office is Room 33, Newton Hall, Town Street, Newton, Cambridge, CB22 7ZE. Our trading address is 1 Cates Corner, Hill Street, Saffron Walden, Essex, CB10 1LU.

Saffron Security are committed to safeguarding your privacy. This privacy policy sets out the basis on which any personal data we hold about you 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.

Saffron Security Ltd is a "Data Controller". This 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 contained in this privacy notice.

This policy applies to all customers who have had a security system installed by Saffron Security Ltd.

The information that we collect from you

In order for us to provide our customers with the service and systems that they require we will require the following information:

- · Name (in full)
- · Address (in full)
- · Phone numbers (land line and mobiles preferred)
- · Email address (for communication if unavailable via the telephone)
- · Bank Details (if a Direct Debit paying customer)
- · Key holder details (in the event of alarm activations and the premises owner is not available)
- \cdot Site specific details regarding the premises, security and structure (this information will be taken on the site survey to assess the level of security required)
- · Job applicants (permission to retain details will be asked for)

How do we use your personal data?

Your personal data will be entered onto our database to assist us with the installation process and renewal of maintenance contracts and facilitate all of the services that you have contracted us to undertake. Your data may be used to verify your own identity for security

purposes. Some of the data will be shared with third parties who also facilitate the services that you have contracted us to undertake. (See below, Who do we share your data with?)

The data may also be used to assist us with performance of our services to you the customer and future services that we could provide for you; for example to monitor our own performance with respect to a particular service that we provide. Should the data be used for this purpose you will not be personally identifiable, it would be for example only.

Our website does not use Cookies at present, although or website is hosted in the United States of America we do not track or use your data from our website.

Who do we share your data with?

Your data is never sold.

Your data is not shared with other parties other than those set out below.

In order for us to carry out the services that you have contracted us to undertake we will be required to share your data with other third parties. As the systems that we provide are varied the third parties will vary too. They are as follows:

We are members of SSAIB, who oversee our industry to ensure quality of service and good practice is observed. All Intruder and CCTV systems that we install (not taken-over) are issued with a certificate of conformity from SSAIB, Security Systems and Alarms Inspection Board. The certificate contains your name and address.

If the system that we have installed for you is monitored for key holder and police response then your data will be shared with our third party monitoring station (ARC) in order for them to correctly respond to your system. They are provided with your name, address and monitoring equipment required. They are also provided with key holder information that you will have supplied to Saffron Security. It is your duty to ensure that your key holders are fully aware that their data will also be shared once you have supplied their information to Saffron Security Ltd.

Further to the above, if your system is monitored, your data will also be shared with your local Police authority in order for them to attend your property. The information shared will be your name, address, system standards and details related to hazards surrounding your property

If you have provided us with key holder information we will forward this information to your local authority in order to comply with noise pollution regulations, it is your duty to ensure that your key holders are fully aware that their data will also be shared once you have supplied their information to Saffron Security Ltd.

You may have opted to pay your annual maintenance fee by Direct Debit, if so these payments are handled by a third party accountancy intermediary and payments deposited in our account by them collectively each month. Information that you will have supplied to us to facilitate this service are: Bank name and address, sort code and account numbers. Please note this is not a default method of payment collection, you will have opted in to have payments taken by Direct Debit and the necessary paperwork will have been completed by you.

If you own a property that is let via an agent and have contracted us to install and maintain a system, we will need to communicate with the agents and on most occasions the tenants to arrange appointments to your property. Your data is not shared with the tenant unless with your prior agreement in writing or email. Your data will be shared with the letting agents whom you will also be contracted to separately. It is not practical for us to carry out our work without this arrangement.

We have a duty to disclose or share your personal details in order to comply with any legal obligation or legal authority if requested. Correct authorisation, Court orders or Warrants will be observed prior to the handover of data.

If our business enters into a joint venture or is sold to another business, we may then share your data with our new business partners or owners.

Where do we store your data?

Your data is stored on a secure server within the European Economic Area.

How long do we hold your data for?

Your data is kept for as long as it is necessary for Saffron Security Ltd to fulfil the purposes that we collected it for. We have to also satisfy any legal and accounting requirements. Your data will not be kept for longer than is necessary for us to satisfy the above. We of course consider the sensitivity of the personal data that we hold for you and any risk that you are exposed to with us holding that data.

Is my data secure?

The access to your data is limited to those employed by Saffron Security Itd or other third parties as highlighted above in Who do we share your data with? The data is shared on a need to know basis and will only share your date on our instructions. They are also subject to a duty of confidentially and will have their own privacy policy.

The data is held on our secure server and appropriate steps have been taken to ensure that there are no security breaches.

Requesting the information that we hold on our system

You have the right to request the disclosure of the data that we hold on our systems about you and your property. You should contact enquiries@saffronsecurity.co.uk to do this and state clearly what you request and why and we will advise you when you should expect the data to be disclosed. We will also advise you whether there will be a charge for this disclosure.

You will not normally have to pay a fee to access your personal information. However, we may charge a reasonable fee if your request for disclosure is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

Other rights?

By law and under certain circumstances you also have the right to the following:

- ·Request the correction of personal information that we hold about you, any inaccuracies can be 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). The removal of your data will limit the service that we can provide for you.
- ·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 particular situation which makes you want to object to processing on this ground. This will also limit the service that we can provide.
- •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. As above this will limit the service that we can provide for you.
- Request the transfer of your personal information to another party. This will need to be in writing, an email at least.

If you want to carry out any of the above please write to Saffron Security Ltd, 1 Cates Corner, Hill Street, Saffron Walden, Essex, CB10 1IU or email enquiries@saffronsecurity.co.uk

Reviewing of the privacy policy

Our policy is reviewed regularly and altered when necessary. This policy was last reviewed and updated in May 2018.

Data Controller

The data controller responsible for your personal data is Saffron Security Ltd. Our data protection registration number is ZA064855 if you have any questions about this policy or how we handle your data in general please contact Saffron Security on 01799 529911 or enquiries@saffronsecurity.co.uk

Complaints

If you feel the need to make a complaint, please direct your communication to enquiries@saffronsecurity.co.uk or SSAIB ssaib@ssaib.org. You can also contact the Information Commissioner's Officer on 0303 123 113. You can also visit the ICO's website by following the link https://ico.org.uk/ for general information on privacy and the General Data Protection Regulation.