



GDPR 2018

## **Data Retention POLICY**

201B West Street, Fareham,  
PO16 0EN,  
**TEL:** 01329339019  
**EMAIL:** [info@gefireandsecurity.co.uk](mailto:info@gefireandsecurity.co.uk)

## Foreword

This policy sets out the general rules and principles to which we adhere. It will be communicated to all businesses and employees by GE Fire and Security Ltd, as well as relevant business partners and other necessary individuals and entities.

This policy explains the procedures through which the G E Fire and Security Ltd can maintain high ethical standards and protect its reputation against any allegations of misuse of Data. Its successful implementation requires pro-active adoption at the following levels:

- You - As an employee of G E Fire and Security Ltd, you are required to read and understand all aspects of this policy, and abide by it
- Management-G E fire and Security's overall compliance with the requirements of this policy is the responsibility of the Directors.
- The Senior Management Team - The Chief Operating Officer will assist each business unit with continuous refreshing and reinforcing of this policy via application guidance and monitoring.

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## 1. Introduction

We are committed to safeguarding the privacy of our customers, suppliers, website visitors and other stakeholders.

This policy applies where we are acting as a data controller with respect to the personal data of our customers, suppliers, website visitors and other stakeholders; in other words, where we determine the purposes and means of the processing of that personal data.

## 2. How we use your personal data

2.1. In this Section 2 we have set out:

- a. the general categories of personal data that we may process;
- b. the purposes for which we may process personal data; and
- c. the legal bases of the processing.

2.2. We may process your account data ("**account data**"). The account data may include your name, address, job title, phone number, email address, employer name and employer address. The source of the account data is you, your employer or a third-party stakeholder in provision of our services. The account data may be processed for the provision our services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

2.3. We may process your personal data that is provided in the course of the use of our services ("**service data**"). The service data may include your name, email address, job title, telephone number, employer name and employer address. The source of the service data is you, your employer or a third-party stakeholder. The service data may be processed for the purposes of providing our services, ensuring the security of our website and services, operating our website, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract or our legitimate interests, namely the proper administration of our website and business.

2.4. We may process information contained in any enquiry or request for quotation you submit to us regarding goods and/or services ("**enquiry data**"). The enquiry data may include your name, email address, job title, telephone number, employer name and employer address. The enquiry data may be processed for the purposes of offering, marketing and selling relevant goods and/or services to you. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

2.5. We may process information relating to our customer relationships, including customer contact information ("**customer relationship data**"). The customer relationship data may include your name, your employer, your job title or role, your contact details, and information contained in communications between us and you or your employer. The source of the customer relationship data is you or your employer. The customer relationship data may be processed for the purposes of managing our relationships with customers, communicating with customers, keeping records of those communications and promoting our products and services to customers. The legal basis for this processing is our legitimate interests, namely the proper management of our customer relationships.

2.6. We may process information relating to transactions, including purchases of goods and services, which you enter into with us and/or through our website ("**transaction data**"). The transaction data may include your name, email address, job title, telephone number, employer name and employer address, your payment details and the transaction details. The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

2.7. We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is consent.

2.8. We may process information to control and monitor access to our office ("**access data**"). The access data may include your name, signature, employer name and image. The legal basis for this processing is our legitimate interests, namely the security and proper administration of our business.

2.9. We may process information that you provide to us for the purpose of subscribing to our mailers, product information updates, industry updates, email notifications and/or newsletter ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent or the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

2.10. We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include your name, email address, job title, telephone number, employer name and employer address. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our business and communications with users.

2.11. We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice, the legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.

2.12. We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

2.13. In addition to the specific purposes for which we may process your personal data set out in this Section 2, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital

interests or the vital interests of another natural person.

2.14. Please do not supply any other person's personal data to us, unless we prompt you to do so.

### **3. Providing your personal data to others**

3.1. We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

3.2. We may disclose your personal data to our third-party monitoring station insofar as reasonably necessary for the purposes of monitoring your fire/security alarm system for alarm.

3.3. CCTV footage from our office CCTV system maybe disclosed to the police or security services insofar as reasonably necessary for the purposes of prevention of crime, apprehension or evidence or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

3.4. Financial transactions relating to our services may be handled by our payment services providers, including but not confined to Secure Trading whom we use to carry out credit/debit card transactions. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds.

3.5. In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

### **4. Retaining and deleting personal data**

4.1. This Section 5 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

4.2. Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

4.3. We will retain your personal data as follows:

(a) Website visitors and other contacts made purely for the purposes of marketing will be retained up until the date where consent is withdrawn.

(b) Contacts associated with contracts/works carried out by GE Fire and Security including but not confined to; architects, building contractors, M & E contacts, employees of G E Fire and Security, suppliers, customers/clients, installers, sub-contractors will be retained in line with industry and insurance requirements.

4.4. Information relating to staff, contractor and human resources records can be found in the GDPR Employee Privacy Notice HR18.

4.5 Images of staff and office visitors on CCTV will be retained for 30 days.

4.6. Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## **5. Amendments**

5.1. We may update this policy from time to time by publishing a new version on our website. You should check this occasionally to ensure you are happy with any changes to this policy.

## **6. Your rights**

6.1. In this Section 9, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

6.2. Your principal rights under data protection law are:

- (a) the right to access;
- (b) the right to rectification;
- (c) the right to erasure;
- (d) the right to restrict processing;
- (e) the right to object to processing;
- (f) the right to data portability;
- (g) the right to complain to a supervisory authority; and
- (h) the right to withdraw consent.

6.3. You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

6.4. You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

6.5. In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: or exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

6.6. In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

6.7. You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

6.8. You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

6.9. To the extent that the legal basis for our processing of your personal data is:

(a) consent; or

(b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

6.10. If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

6.11. To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

6.12. You may exercise any of your rights in relation to your personal data by written notice to us.

## **7. Third party websites**

7.1. Our website includes hyperlinks to, and details of, third party websites.

7.2. We have no control over, and are not responsible for, the privacy policies and practices of third parties.



## **8. Updating information**

8.1. Please let us know if the personal information that we hold about you needs to be corrected or updated.

## **9. About cookies**

9.1. We use cookies on our website. Insofar as those cookies are not strictly necessary for the provision of our website and services, we will ask you to consent to our use of cookies when you first visit our website.

9.2. Our website incorporates privacy controls which affect how we will process your personal data. By using the privacy controls, you can specify whether you would like to receive direct marketing communications and limit the publication of your information.

9.3. A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

9.4. Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

9.5. Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

## **10. Managing cookies**

10.1. Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- a. <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- b. <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- c. <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- d. <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-deletemanage-cookies> (Internet Explorer);
- e. <https://support.apple.com/kb/PH21411> (Safari); and
- f. <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

10.2. Blocking all cookies will have a negative impact upon the usability of many websites.

10.3. If you block cookies, you will not be able to use all the features on our website.

11. Our details

11.1. Our website is owned and operated by G E Fire and Security Ltd.

11.2. We are registered in [England and Wales] under registration number 09421691 and our registered office is at *201B West Street, Fareham, Hampshire, PO16 0EN*

11.3. Our principal place of business is at *201B West Street, Fareham, Hampshire, PO16 0EN*.

11.4. You can contact us:

a. by post, to the address above.

b. by telephone, on 01329 339 019

c. by email, [info@gefireandsecurity.co.uk](mailto:info@gefireandsecurity.co.uk)