



Security Plus Limited

Privacy policy

1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors and service users.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of our website visitors and service users; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 In this policy, "we", "us" and "our" refer to Security Plus + Limited. For more information about us, see Section 8.

2. Information we may collect from you and how we use your personal data

- 2.1 In this Section 2 we set out:
 - (a) the general categories of personal data that we may process;
 - (b) in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
 - (c) the purposes for which we may process personal data; and
 - (d) the legal bases of the processing.
- 2.2 The information you give us and we may collect about you will include:
 - (a) **Usage Data**-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. This data will be obtained from you.
 - (b) **Account Data**- your name, email address and contact details. This data will be obtained from you or your employer.
 - (c) **Service Data**- your name, your employer, your job title/role, your contact details, information contained in communications between us and you or your employer. This data will be obtained from you or your employer.

- (d) **Enquiry Data**-your name, e-mail address and contact details. This data will be obtained from you.
- (e) **Customer Relationship Data**-your name, your employer, your job title/role, your contact details and information contained in any communications between you and us or your employer and us. This data will be obtained from you or your employer.
- (f) **Transaction Data**- details relating to us providing goods/services to you. This data will be obtained from you or your employer.
- (g) **Correspondence Data**- information used or collected when corresponding with us by phone, e-mail and otherwise. This data will be obtained from you or your employer.

2.3 By law, we can only use personal information about you on a limited number of defines bases-the "lawful bases". The lawful bases are as follows:

- (a) The data subject has consented to such use.
- (b) The use is necessary for the performance of a contract with the data subject.
- (c) The use is necessary for compliance with a legal obligation that we owe.
- (d) The use is necessary to protect the vital interests of the data subject or another person.
- (e) The use is necessary for the performance of a task carried out in the public interest, or in the exercise of official authority.
- (f) The use is necessary for the purposes of legitimate interests of us or a third party (except where such interests are overridden by your fundamental rights and interests).

Of particular concern to us are the bases identified in 1,2,3 and 6 above.

2.4 The table below shows what uses we make of the information we collect and what category of information is involved in that use. It also shows what lawful bases are applicable to each use:

Use/Activity	Data Required	Lawful Basis
To register you as a customer	Account Data Customer Relationship Data	Performance of a Contract
To deal with customer enquiries	Enquiry Data	Consent from customers Performance of a contract
To process an	Account Data	Performance of a contract

<p>order/instruction from you for goods or services including:</p> <ul style="list-style-type: none"> (a) provide you with updates in relation to the services we are providing to you (b) manage payments, fees and charges (c) collect and recover money owed to us 	<p>Service Data</p> <p>Customer Relationship Data</p> <p>Transaction Data</p> <p>Correspondence Data</p>	<p>Necessary for our legitimate interest (to recover debts due to us)</p>
<p>To manage our relationship with you:</p> <ul style="list-style-type: none"> (a) notifying you about changes to our terms or our privacy policy (b) communicating with our customers (c) keeping records of communications with our customers (d) promoting our products and services to our customer 	<p>Account Data</p> <p>Customer Relationship Data</p> <p>Correspondence Data</p> <p>Transaction Data</p>	<p>Necessary to comply with a legal obligation</p> <p>Performance of a Contract</p> <p>Necessary for our legitimate interests (to keep records updated and to study how customers use our goods/services)</p>
<p>To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>Account Data</p> <p>Usage Data</p>	<p>Necessary for our legitimate interests(for running our business, provision of administration and IT services, network security , to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>Necessary to comply with a legal obligation.</p>
<p>To deliver relevant website</p>	<p>Account Data</p>	<p>Necessary for our legitimate</p>

content, advertisements to you and measure or understand the effectiveness of the advertising we serve to you.	Usage Data Customer Relationship Data	interests (to study how customers use our goods/services to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, goods/services, customer relationships and experiences	Usage Data	Necessary for our legitimate interests (to define types of customers for our goods and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).

2.5 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.

2.6 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.

2.7 In addition to the specific purposes for which we may process your personal data set out in this Section 3, 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.

2.8 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 have to share your personal data with the parties set out below for the purposes set out in the table in section 2 above.

(a) **Internal Third Parties** - any member of our group of companies (this means our ultimate holding company and all its subsidiaries acting as joint controllers or processors) and who are based [in the United Kingdom] and provide Information about our group of companies can be found at www.secplus.co.uk

(b) **External Third Parties** - Service providers acting as processors based in the United Kingdom who provide IT and system administration services.

Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.

HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

- 3.2 Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
- 3.3 We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

4. International transfers of your personal data

- 4.1 We confirm that any personal data collected is not transferred outside the European Economic Area (EEA).

5. Retaining and deleting personal data

- 5.1 This Section 6 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.
- 5.2 We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
- 5.3 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. Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us at [*dpo@secplus.co.uk*](mailto:dpo@secplus.co.uk).
- 5.4 By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.
- 5.5 In some circumstances you can ask us to delete your data, see section 7 below for further information.

5.6 In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you

6. Amendments

6.1 We may update this policy from time to time by publishing a new version on our website.

6.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

6.3 We may notify you of significant changes to this policy by email.

7. Your rights

7.1 In this Section 7, 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.

7.2 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.

7.3 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.

7.4 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.

- 7.5 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: for 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.
- 7.6 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.
- 7.7 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.
- 7.8 You have the right to ask us not to process your personal data for marketing purposes. We will ask for your consent (before collecting your data) if we wish to use your data for such purposes or if we wish to disclose your information to any third party for such purposes. You can update your marketing preferences at any time by contacting us at dpo@secplus.co.uk.
- 7.9 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.

- 7.10 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.
- 7.11 You may exercise any of your rights in relation to your personal data by written notice to us, in addition to the other methods specified in this Section 7.
- 7.12 You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.
- 7.13 We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
- 7.14 We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.
- 7.15 You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

8. Our details

- 8.1 This website is owned and operated by Security Plus + Limited
- 8.2 We are registered in England and Wales under registration number 1325489, and our registered office is at *Tolerant House, Bellringer Road, Trentham Lakes South, Stoke on Trent, Staffordshire. ST4 8GZ.*
- 8.3 You can contact us:
 - (a) by post, at the above address;
 - (b) using our website contact form;

(c) by telephone, on the contact number published on our website

(d) by email, using the email address published on our website

9. Data protection officer

9.1 Our data protection officer's contact details are: *dpo@secplus.co.uk*