

1. Scope

As a stakeholder for CIS Security Ltd, it is important that you trust us as Data Controllers to adhere to the General Data Protection Regulations (GDPR) in relation to the collection, storage and handling of your personal data. Our commitment to your privacy is contained within this Privacy Notice.

2. Responsibilities

- 2.1 CIS Data Protection Officer, Stuart Bateman is responsible for ensuring that this notice is made available to all data subjects prior to CIS Security Ltd collecting and processing their personal data.
- 2.2 All employees of CIS Security Ltd who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

3. Privacy Notice

3.1 Who are we?

CIS Security Ltd provides security, people, to clients throughout the UK. Founded in 1969 by two former Police Officers. CIS Security initially operated as a security management and commercial investigation specialist advising City and industry clients on matters relating to best security practice and providing a loss prevention and investigation service. In 1972 the company joined the manned guarding industry when customers found it difficult to find a suitable security company to provide professional security personnel with the ability to fulfil the recommendations/positions proposed by our experts.

CIS Security felt the security market would benefit from a professional security company with a strong management support structure, adaptability to compliment the client's aims and ethos and highly trained security staff essential for the City and West End marketplace; subsequently the CIS Security manned guarding division was formed.

The provision of Manned Security Services is now our core product and since 1972 when our first manned guarding contract was awarded and implemented we have steadily grown enabling us to maintain our customer focus, reputation and staff/client loyalty. Services provided are: Door Supervision, Static Guarding and Special Events, Reception and Concierge, CCTV Surveillance Monitoring, Key Holding and Alarm Response, Consultancy, Training and Car Park Management. There is also a separate division for Front of House services.

Our Data Protection Officer, Stuart Bateman and Data Protection Representatives can be contacted directly here:

- dpo@cis-security.co.uk
- 020 8690 1903

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The personal data we would like to collect and process from you is:

Personal Data Type:	Source of Collection (where CIS Security obtained the personal data from if it has not been directly collected from you, the data subject. Note the personal data has been accessed from publicly accessible sources).
Name, Business Email Address, Contact Number	From Data Subject as part of a service provider contractual agreement.

The personal data we collect will be used for the following purposes:

- Processing of financial management functions including sales ledger, credit control and nominal ledger procedures
- Service provider contractual and/or business obligations
- Service provider marketing and communications including intelligence and risk updates, newsletters, bulletins, marketing updates
- Service delivery performance management
- Company auditing against industry standards
- Management reporting for the purposes of monitoring against service delivery, auditing and business objectives

Our legal basis for processing the personal data:

- Contractual obligations with external stakeholders including clients, suppliers, government authorities and other interested parties
- Industry and regulatory requirements including external auditing processes

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests. These are as follows:

- Industry and regulatory requirements including external auditing bodies and government authorities

3.2 Disclosure

CIS Security Ltd will not pass on your personal data to trusted third parties except for the following circumstances or without first obtaining your consent.

The following third parties we work with are:

- IT companies who support our website, rostering, financial, payroll and our other business IT systems
- Technology suppliers such as phone, patrolling equipment
- Company insurers and HSE in relation to incidents of accidents/injuries within the workplace

The following safeguards have been put in place to protect your personal data.

The organisation has internal policies and controls in place to protect personal data against loss, accidental destruction, misuse or disclosure, and to ensure that data is not accessed, except by employees in the proper performance of their duties. Access to the CIS internal IT infrastructure is controlled by password protection and as such has measures in place to minimise risk of illegal access from outside parties. All external third-party systems used by CIS are password protected and access is restricted in line with the role of employee.

All internal data used by CIS is backed up daily and held externally by a third party on servers located in the UK at a bomb-proof, flood-proof and EMP-proof data centre and holds both ISO27001 and ISO9001 certifications.

Here is the policy we apply to those organisations to keep your data safe and protect your privacy:

- We provide only the information they need to perform their specific services
- They may only use your data for the exact purposes we specify in our contract with them
- We work closely with them to ensure that your privacy is respected and protected at all times
- If we stop using their services, any of your data held by them will either be deleted or rendered anonymous

3.3 Retention Period

CIS Security Ltd will process personal data for the duration of our contract with our stakeholders. After contracts have ended the organisation will store your personal data for a period of seven years; health and safety accidents for 20 years, unless it is considered a legal requirement to extend this retention period such as HMR, health and safety legal requirements.

Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- *Right of access* – you have the right to request a copy of the information that we hold about you
- *Right of rectification* – you have a right to correct data that we hold about you that is inaccurate or incomplete
- *Right to be forgotten* – in certain circumstances you can ask for the data we hold about you to be erased from our records
- *Right to restriction of processing* – where certain conditions apply to have a right to restrict the processing
- *Right of portability* – you have the right to have the data we hold about you transferred to another organisation
- *Right to object* – you have the right to object to certain types of processing such as direct marketing
- *Right to object to automated processing, including profiling* – you also have the right to be subject to the legal effects of automated processing or profiling

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- *Right to judicial review* - if CIS Security refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.4 below.

All the above requests will be forwarded on should there be a third party involved (as stated within 3.3 above) in the processing of your personal data.

3.4 Complaints

If you wish to make a complaint about how your personal data is being processed by CIS Security Ltd (or third parties as described in 3.3 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and CIS Security Data Protection Officer.

The details for each of these contacts are:

	ICO Contact Details	CIS Security Data Protection Officer
Contact Name:	N/A	Stuart Bateman
Address:	N/A	CIS Security Ltd 418-426 Lewisham High Street London SE13 6LJ
Website / Email:	www.ico.org.uk	dpo@cis-security.co.uk
Telephone:	0303 123 1113	020 8690 1903

3.5 Privacy Statement

Read more about how and why we use your data in CIS Data Privacy Policy, this can be found in the attachment and on our web site.

4. Privacy Statement

Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

“any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

How we use your information

This privacy notice tells you how we, CIS Security Ltd, will collect and use your personal data for the purposes of your service provider contract with the organisation.

Why does CIS Security Ltd need to collect and store personal data?

For us to comply with legal and contractual obligations we need to collect personal data for the processing of service provider contractual requirements with CIS Security Ltd. In any event, we are committed to ensuring that the information we collect, and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

In terms of being contacted for marketing purposes CIS Security Ltd will contact you for additional consent for example to be included within the company newsletter and/or appear on company marketing material.

Will CIS Security Ltd share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to CIS Security Ltd while dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide on our behalf as detailed within section 3.2 of this Privacy Notice. When they no longer need your data to fulfil this service, they will dispose of the details in line with CIS Security procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

How will CIS Security Ltd use the personal data it collects about me?

CIS Security will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. CIS Security is required to retain information in accordance with law, such as information for audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

Under what circumstances will CIS Security Ltd contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

Can I find out the personal data that the organisation holds about me?

CIS Security Ltd at your request, can confirm what information we hold about you and how it is processed. If the organisation does hold personal data about you, you can request the following information via the Subject Access Request form and Policy.

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the Data Protection Officer
- The purpose of the processing as well as the legal basis for processing
- If the processing is based on the legitimate interests of CIS Security or a third party, information about those interests
- The categories of personal data collected, stored and processed
- Recipient(s) or categories of recipients that the data is/will be disclosed to

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- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard or data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored
- Details of your rights to withdraw consent at any time
- How to lodge a complaint with the supervisory authority
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data
- The source of personal data if it wasn't collected directly from you
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing

What forms of ID will I need to provide to access this?

CIS Security Ltd accepts the following forms of ID when information on your personal data is requested:

Passport, driving licence, birth certificate and utility bill (from the last three months)

Contact details of CIS Data Protection Officer:

	Data Protection Officer
Contact Name:	Stuart Bateman
Address:	CIS Security Ltd 418-426 Lewisham High Street London SE13 6LJ
Email:	dpo@cis-security.co.uk
Telephone:	020 8690 1903

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Document Owner and Approval

The Managing Director is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with the requirements of the GDPR.

A current version of this document is available to all members of staff on the company website and Y:\ drive. It does not contain confidential information and can be released to relevant external parties.

This information security policy was approved by the Board of Directors on 18/05/2018 and is issued on a version-controlled basis under the signature of CIS Managing Director.

Signature:

Date: 18th May 2018

Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	Managing Director	18.05.18