



Privacy Notice

Security Man Ltd is committed to ensure the privacy and safety of personal data in compliance with the applicable data protection legislation. This privacy policy explains how Security Man Ltd handles personal information and other data we obtain from you anytime you interact with us, such as when you browse on our website (www.securitymanuk.com) or create a user profile, or when you use our service to upload or download content. The Privacy Notice also describes your rights and how you can exercise those rights in regards to Security Man Ltd.

The organisation collects and processes personal data relating to its employees to manage the employment relationship. The organisation is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

What information does the organisation collect?

Security Man Ltd collects and processes a range of information about you. This includes but not limited to:

- your full name, address and contact details, including email address and telephone number, date of birth and gender;
- your employment records;
- details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with the organisation;
- details of your bank account and national insurance number;
- information about your marital status, next of kin, dependants and emergency contacts;
- information about your nationality and entitlement to work in the UK;
- information about your criminal record;
- details of your schedule (days of work and working hours) and attendance at work;
- details of periods of leave taken by you, including holiday, sickness absence, family leave and sabbaticals, and the reasons for the leave;
- details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence;
- assessments of your performance, including appraisals, performance reviews and ratings, training you have participated in, performance improvement plans and related correspondence;
- information about medical or health condition;
- equal opportunities monitoring information.



How do we collect your person data?

We may receive your personal data directly from you, your previous employers, from a business partner or from publicly available information. Security Man Ltd will only disclose or receive personal data from a third-party in compliance with the applicable data protection legislation.

The organisation collects this information in a variety of ways. For example, data is collected through application forms, CVs or resumes; obtained from your passport or other identity documents such as your driving licence; from forms completed by you at the start of employment; from correspondence with you; or through interviews, meetings or other assessments.

In some cases, the organisation collects personal data about you from third parties, such as references supplied by former employers, information from employment background check providers, information from credit reference agencies and information from criminal records checks permitted by law.

The organisation seeks information from third parties with your consent only.

Why does the organisation process personal data?

The organisation needs to process data to enter into an employment contract with you and to meet its obligations. For example, it needs to process your data to provide you with an employment contract, to pay you and to administer benefit, pension and insurance entitlements.

In some cases, the organisation needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check an employee's entitlement to work in the UK, to deduct tax, to comply with health and safety laws and to enable employees to take periods of leave to which they are entitled. For certain positions, it is necessary to carry out criminal records checks to ensure that individuals are permitted to undertake the role.



Processing employee data allows the organisation to:

- run recruitment and promotion processes;
- maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency), and records of employee contractual and statutory rights;
- operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace;
- operate and keep a record of employee performance and related processes, to plan for career development, and for succession planning and workforce management purposes;
- operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled;
- obtain occupational health advice, to ensure that it complies with duties in relation to individuals with disabilities, meet its obligations under health and safety law, and ensure that employees are receiving the pay or other benefits to which they are entitled;
- operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to allow effective workforce management, to ensure that the organisation complies with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled;
- ensure effective general HR and business administration;
- provide references on request for current or former employees;
- respond to and defend against legal claims and
- maintain and promote equality in the workplace.

Where the organisation processes other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is done for the purposes of equal opportunities monitoring. Data that the organisation uses for these purposes is anonymised or is collected with the express consent of employees, which can be withdrawn at any time. Employees are entirely free to decide whether or not to provide such data and there are no consequences of failing to do so.



Lawfulness of processing

The lawful bases for processing are set out in Article 6 of the GDPR. Processing shall be lawful only if and to the extent that at least one of the following applies:

- a) the data subject has given **consent** to the processing of his or her personal data for one or more specific purposes;
- b) processing is necessary for the performance of a **contract** to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- c) processing is necessary for **compliance with a legal obligation** to which the controller is subject;
- d) processing is necessary in order to protect the **vital interests** of the data subject or of another natural person;
- e) processing is necessary for the performance of a task carried out in the **public interest** or in the exercise of official authority vested in the controller;
- f) processing is necessary for the purposes of the **legitimate interests** pursued by the Security Man Ltd or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

Point (f) of the first subparagraph shall not apply to processing carried out by public authorities in the performance of their tasks.

Who has access to data?

Your information will be shared internally, including with members of the HR and recruitment team (including payroll), your line manager, managers in the business area in which you work and IT staff if access to the data is necessary for performance of their roles.

In some specific circumstances, we may also disclose your personal data to government, public authorities, statutory or regulatory bodies and enforcement bodies, when compelled to do so.

Security Man Ltd will only disclose your personal data to parties providing sufficient guarantees to ensure the protection of your data and the realisation of your rights as data subject (see title below 'What rights do you have?')



Sharing your data with third parties

The organisation shares your data with third parties in order to obtain pre-employment references from other employers, obtain employment background checks from third-party providers and obtain necessary criminal records checks from the Disclosure and Barring Service. In some specific circumstances, we may also disclose your personal data to government (such as HMRC), public authorities, statutory or regulatory bodies and enforcement bodies, when compelled to do so. Anything that isn't for a legal purpose, we will ask for your consent. Security Man Ltd will only disclose your personal data to parties providing sufficient guarantees to ensure the protection of your data and the realisation of your rights as data subject.

The organisation will not transfer your data to countries outside the European Economic Area (EEA).

You may always obtain a copy of the data transferred to these third-parties upon request to us.

How long do we keep your personal data?

We will not retain your personal data for longer than necessary and we will hold it only for the purposes for which it was obtained. The length of time we retain your personal data depends on the purposes for which we use it. Please notice that Security Man Ltd may also be legally obliged to store your personal data for a minimum time period to comply with statutory requirements. We will perform regular checks to identify personal data which no longer serve any purpose in order to delete them or otherwise anonymize them.

How does the organisation protect your data?

Security Man Ltd takes the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.

Where the organisation engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

We encourage you to review and check our website regularly for any updates to this Privacy Notice. If you would like a copy of this Privacy Notice, please contact us at info@securitymanuk.com

Security Man Ltd Privacy Notice was last updated on 1st July 2020



What rights do you have?

As a data subject, you have a number of rights. You can:

1. Right of access – you have the right to request a copy of the information that we hold about you.
2. Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
3. Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records. Legal requirements for employment mean we will need to retain information as agreed in a contract of employment with you.
4. Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
5. Right of data portability – you have the right to have the data we hold about you transferred to another organisation.
6. Right to object – you have the right to object to certain types of processing such as direct marketing.
7. 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 where relevant.
8. Right to be informed – you have a right to be informed about the data we hold about you and what do we do with it.

Rights of withdrawal

Where permitted by applicable law or regulation, you have the right to withdraw your consent to us to process your personal data or to tell us to stop processing it (including for purposes of direct marketing). Once you have informed us of this request, we shall no longer process your personal data unless permitted by applicable laws and regulations.



How can you contact us?

In the event that you wish to make a complaint about how your personal data is being processed by Security Man Ltd, you can write to us at the following address, or contact us by email or telephone as follows:

Data controller: SECURITY MAN LTD

Address: Kemp House, 152-160 City Road, London, EC1V 2NX

Email: info@securitymanuk.com

Phone Number: 020 3444 0434

Data protection officer: VAIDA STAMPORICKAITE

Email: vaida@securitymanuk.com

Phone Number: 074 0312 1472

Complaints Procedure

If you are not satisfied with our response to any complaint, or if you believe our processing of your information does not comply with data protection law, you can make a complaint to the Information Commissioner's Office ("ICO") using contact details below:

Information Commission officer (ICO)

Wycliffe House, Water Ln, Wilmslow, SK9 5AF

<https://ico.org.uk>

casework@ico.org.uk

0303 123 1113

Signed Edward Opalka

Managing Director

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