

Dated 6th August 2018



PRIVACY STATEMENT

OVERVIEW

Elite Security Group is a privately owned and independent provider of manned security services. Providing a variety of services including manned security guarding, mobile patrol services, keyholding and alarm response services; the Company uses, holds and resources information to facilitate the provision of service and comply with British Standards, Industry Accreditations, and statute or regulations.

Elite Security Group recognises that privacy is a fundamental human right and further recognises the importance of privacy, security and data protection within all Company processes and procedures. Whilst we inherently collect data during the routine course of business, we are committed to protecting the privacy of individuals, customers and organisations.

Whilst some data will be held or retained for the proper performance of agreed contractual obligations, as defined by Article 6 (1) (b) of the GDPR Regulations, other data may be retained in compliance with British Standards or some other parliamentary enactment (ie. the Private Security Industry Act 2001, the Employment Rights Act 1996 or The Income Tax (Pay As You Earn) Regulations 2003).

The Company only requests or holds data specific to the intended function made clear at the outset. The Company does not hold data for marketing purposes, or for purposes which are manifestly different from which the original data was provided.

ACCESS TO RESOURCE

In order to comply with the British Standard for Screening and Vetting (BS7858:2012), Elite Security Group sources information pertaining to individuals seeking employment. This involves the use of a Credit Reference Agency for the purposes of identity verification. We use Callcredit Limited, part of the TransUnion Information Group, and their own privacy statement is available at <https://www.callcredit.co.uk/legal-information/bureau-privacy-notice>.

It is important to note that the Application for Employment adequately seeks permission for such a reference search to take place, in advance of one being carried out. And any reference search is restricted in scope to the purposes identified therein.

DATA SYSTEMS & STORAGE

Elite Security Group employs a 'cloud' based system for data retention. With 2048-bit RSA, SSL/TLS data encryption, data is replicated across multiple SSAE 16 type 2 certified datacentre locations with SAS RAID storage, maintaining an automatic failover with a 99.9% or better uptime SLA.

The system maintains an audit trail of users including recording information on those who have accessed, amended, deleted or otherwise administrated any given document, whilst retaining versions and revisions - pre-amendments onwards. The system can also allow the administration of 'read only' sections where suitable, providing ultimate control over document storage and retention and dissemination.

All computer systems and IT equipment are password protected to limit access to those machines often able to access data. Anti-virus is installed on every piece of equipment and backups are maintained through our standard of infrastructure.

EXAMPLE OF DATA RETAINED

The following list, whilst limited, provides an overview to the types of data the Company looks to retain as part of normal business operations. As previously identified, some of this information is required by law and/or some other justifiable reason. The Company is therefore keen to comply with GDPR whilst acknowledging its wider obligations where relevant.

Please note, this list is not exhaustive.

- 1) Personal Information of Employees
- 2) Training Records
- 3) Next of Kin Information
- 4) Work History of Employees
- 5) Credit Score of Employees
- 6) Payroll History
- 7) Court Orders (Attachment of Earnings Orders)
- 8) Client Information
- 9) Client Payment History
- 10) Client Property Information

SUMMARY

Scott Huntley, Director of Support Services, is the nominated Data Controller and the Company is appropriately registered with the ICO. It is the intention of the Company to fully comply with best practice for the protection of data, whilst also employing reasonable and duly considered care and attention to the normal operations of the business.

Elite Security Group fully complies with the obligations set out in the **General Data Protection Regulations (GDPR)** and maintains records to that effect. Should you require further clarification as to the compliance of the organisation, please contact the Data Controller, Scott Huntley at our Head Office in Swindon.

Notable Company Policies:

- 07-039 – Data Protection Policy (GDPR)
- 07-044 – Information Security Policy