

## Privacy Policy for Customers

### 1. Introduction

This privacy notice explains why we collect our customer's personal information, what we collect, what we do with it and the conditions in which we may disclose it to others.

This policy applies to all companies and employees, including sub-contractors, in Kings Solutions Group ("Kings") who are handling personal data. In order to fulfil our contractual requirements to you we may share your data between two of our companies: Kings Security Systems Limited and UK Monitoring Limited.

The contracted customer is the data controller in the relationship between kings and the customer. Where any processing is sub-contracted, Kings assume the role of data controller. Kings are the data controller of employee data.

This policy may be updated from time to time and is freely available to all stakeholders of Kings on the website or on request.

Kings are committed to the security of data at all times and to this end are externally audited to ISO 27001, the international standard of approval for Information Security Management Systems. More about this can be found in our security policy, CPL04.

All Kings personnel with access to personal data are security screened to BS 7858 as a minimum. Additional security clearance is in place for some employees at customer's specification.

### 2. Definition of Data Protection Terms

Data is recorded information whether stored electronically, on a computer, or in certain paper-based filing systems.

**Data subjects** for the purpose of this policy include all living individuals about whom Kings holds personal data. A data subject need not be a UK national or resident. All data subjects have legal rights in relation to their personal information.

**Personal data** means data relating to a living individual who can be identified from that data (or from that data and other information in possession of the company). Personal data can be factual (such as a name, address or date of birth) or it can be an opinion (such as a performance appraisal). It can even include a simple e-mail address. It is important that the information has the data subject as its focus and affects the individual's privacy in some way. Mere mention of someone's name in a document does not constitute personal data, but personal details such as someone's contact details or salary would still fall within the scope of the Data Protection Act (2018) and the General Data Protection Regulation (GDPR) 2016 ("the Acts").

**Data controllers** are the people or organizations who determine the purposes for which, and the manner in which, any personal data is processed. They have a responsibility to establish practices and policies in line with the Acts.

**Data Users** include employees whose work involves using personal data. Data users have a duty to protect the information they handle by following the company's data protection and security policies at all times.

## Privacy Policy for Customers

**Data Processors** include any person who processes personal data on behalf of a data controller. Employees of data controllers are excluded from this definition but it could include suppliers which handle personal data on the company's behalf.

**Processing** is any activity that involves use of the data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring personal data to third parties.

**Sensitive Personal** data includes information about a person's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health or condition or sexual life, or about the commission of, or proceedings for, any offence committed or alleged to have been committed by that person, the disposal of such proceedings or the sentence of any court in such proceedings. Sensitive personal data can only be processed under strict conditions, including a condition requiring the express permission of the person concerned.

### 3. How we use your information

In the course of fulfilling our contractual obligations to you, we may gather and process the following personal data. We use this data solely for the purposes of meeting our contractual requirements with you, the customer, as defined below.

The data may be provided directly by you, or your employer if our contract is with them:

- Name and telephone number – we will use this to contact you or the emergency services in the event of an alarm or CCTV activation, or to arrange a visit to your premises to maintain your fire / security system. At your request, our auto – handler may send you an SMS notifying you of an alarm activation.
- Address of protected premises – we will use this to send you invoices or attend your premises to maintain your fire / security system.
- CCTV images – at your request we will process CCTV images from your premises in order to protect against, deter from and detect crime. More information on this is available in our CCTV policy (CPL52). Dependant on contractual agreements CCTV images may be recorded and stored for evidence and crime prevention purposes. Images will only be taken when a crime has been committed and can be verified by monitoring software, the images may be passed to law enforcement if requested.  
Any images recorded and stored will be done so in line with relevant legislation, data protection and codes of practice.  
Access to stored images is restricted to those who require access to fulfil contractual duties only.
- Audio recordings – If provided by you we may store your audio recordings as evidence. The legal basis for processing is to assist in any investigations by law enforcement.
- Location – where providing a lone worker/personal protection system we may monitor your location at point of activation
- Email address – we will use your email address to send you invoices, notifications of alarm incidents and reports at your request. From time to time we may send you e-newsletters updating you on products or services you have registered an interest in (you can opt out of this at any time using the contact information above), the legal basis for this is the pursuit of a legitimate interest in developing your products and services.

## Privacy Policy for Customers

Your data will only be kept as long as it is required to deliver your contractual requirements, in line with our data retention and destruction policy and statutory and regulatory requirements. You can request a copy of any of our security policies at any time by contacting [compliance@kingsltd.co.uk](mailto:compliance@kingsltd.co.uk), or alternatively use our 'contact us' section on our webpage at [www.kingsltd.co.uk](http://www.kingsltd.co.uk).

### 4. Our website

You can use our website to contact us or to sign up to our newsletter. We restrict the information gathered on our website to those in the categories in section 3. We use this information to improve our products and services and to respond to your contact form.

#### How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

#### Links to other websites

Our website may contain links to other websites. However, once you have used these links to leave our site, you should note that we may not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

### 5. Recipients of data

In order to fulfil the requirements of our customer contracts we may use third party providers' platforms. We have privacy agreements in place with all our suppliers and have a rigorous selection process to ensure your data is protected at all times.

We will never transmit your data outside the European Economic Area (EEA) without your prior written consent.

#### Alarm Monitoring

We use a platform called Sentinel to monitor your alarm system. This database holds the information of the protected property and recorded keyholder information as detailed in section 3 of this policy. The database is stored on a local server on Kings premises and any unauthorised access is not permitted. Any data we store is limited to what is necessary for the fulfilment of your

## Privacy Policy for Customers

contract. For premises based in Southern Ireland we outsource all monitoring to Mercury Security Management Ltd, a Northern Ireland based company.

### CCTV Monitoring

We use multiple platforms for remote monitoring CCTV systems including ADPRO, IMMIX, Sentinel and Wireless CCTV. Which platform is used depends on what system you have in place. The manufacturers of these platforms may access the data from time to time solely to provide remote support in the event of system maintenance. We manage the storage of your data and all monitoring and response is carried out at Kings.

### Lone Worker Solutions

We work in partnership with Lone Worker Solutions to provide a monitored lone worker service. Lone Worker Solutions have access to the device details, including the device holder's name and location in order to provide reports. Responses to alerts are all signalled to and conducted at Kings premises. Once an incident has been handled and marked as closed, Kings personnel no longer have access to the data. Any requests for information shall be forwarded to Lone Worker Solutions for processing.

## 6. Kings Commitment

In line with the requirements of the Acts, Kings commit to the following:

- Your data will only be used as you intended it, to deliver your contractual requirements and any additional requests which come from you or your organisation
- Your data will never be bartered or sold
- Your data will only be given to law enforcement when legal process has been followed
- Your data will never be given to advertisers

## 7. Your rights

Under the GDPR, you have the following rights, which we will honour at all times:

- The right to be informed – this privacy policy outlines how and why we process your data
- The right of access – you may request a copy of all your personal data held by Kings at any time
- Right to rectification – if you believe any data we hold is incorrect you may request we update it
- Right to erasure – you have the right to request your information be removed from our systems at any time. We will fulfil this request as long as it does not conflict with legal or contractual requirements
- Right to restrict processing – you may limit what data of yours we process and how, at any time, as long as it does not conflict with legal or contractual requirements
- Right to data portability – we are obliged to make your information available in a legible format to your chosen company if you choose to leave us
- Right to object – at any time you may object to the processing of your data, details how are below in section 8
- Rights related to automated decision making – we do not use automated decision making platforms

## 8. Contact Us

## Privacy Policy for Customers

Any questions concerning this policy should be sent to [compliance@kingsltd.co.uk](mailto:compliance@kingsltd.co.uk), or our registered Head Office address: 4 St Dunstons Technology Park, Bradford, BD4 7HH, alternatively call 0330 678 0635 and ask to speak to the Compliance Team.

If you would like to make a complaint or request access to your data you can use these contact details also. Our complaints and subject access request policies are available on our website or on request.

### 9. Complaints

If you are unsatisfied with how we've handled a complaint in regards to your personal data, you can contact the Information Commissioner's Office <https://ico.org.uk/>