

## Privacy Policy for Suppliers

### Scope of the Business

This policy covers the scope of all Kings Solutions Group Companies (Kings) including;

- Kings Security Systems T/A Kings Secure Technologies
- Silver UK Ltd T/A Silver Group
- Cougar Monitoring Ltd
- Quidvis Ltd

### Introduction

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

In order to fulfil our contractual requirements to you we may share your data between any of our companies: Kings Security Systems Limited, Kings Training Academy Limited, Quidvis Limited, Cougar Monitoring Limited and Silver UK Limited.

Kings are the Data Controller in the relationship between Kings and the Supplier.

This policy may be updated from time to time and is freely available to all stakeholders of Kings in Entropy 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.

### 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 General Data Protection Regulation (GDPR) 2016.

**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 Act.

**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.

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**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.

### How we use your information

The personal data we obtain from suppliers is as follows.

- Business email & contact number– all company email is monitored in line with our IT and Acceptable Use policies. This processing is in the legitimate interests of Kings to ensure the reputation of the business is upheld at all times. Emails are kept for two years in mailboxes and available for seven years in the archive. Contact telephone numbers will be used for business use only. Email and contact numbers will never be shared with any other organisation without your prior consent.
- Employee's SIA licences – if you provide security personnel labour we may request a copy of your employee's SIA licences to check. This is in the legitimate interest of Kings to ensure all labour provided to customers meets our contractual requirements.

### Our website

#### 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

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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.

### Kings Commitment

In line with the requirements of the European General Data Protection Regulation 2016 (GDPR) 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
- 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

### 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 7
- Rights related to automated decision making – we do not use automated decision making platforms

### Contact Us

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.

### 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/>