

Privacy Notice

Introduction

CCTV Monitoring Ltd.'s privacy notice is in place to set out how the company uses personal data when individuals engage with the company. This includes:

- What data is processed
- How the data is collected
- Special categories of data
- Failure to provide data
- Who we share your data with
- Protecting your data
- Retention periods
- Employee rights
- Why personal data is collected
- How data is stored
- How long the data is stored for
- Individual Rights

What Personal Data Is Processed

CCTV Monitoring Ltd. collects a variety of personal data from different sources. The following personal data can be recorded:

- Name, date of birth, address, phone number and email address
- Bank Details, national insurance number and tax codes
- Information about individuals' devices, such as IP address
- Name and contact details of your next of kin
- Your photograph, driving licence and passport
- Your gender, marital status, information on any disability you have or other medical information
- Right to work documentation
- Information about your race and religion for quality monitoring purposes
- Information gathered via the recruitment process such as that entered into a CV or included in a CV cover letter
- References from former employers
- CCTV Footage, building access card records and IT equipment use including telephones and internet access
- Information relating to your employment with us, including:
 - i) Job title and job descriptions
 - ii) Your salary
 - iii) Your wider terms and conditions of employment
 - iv) Details of formal and informal proceedings involving you such as letters of concern, disciplinary and grievance proceedings, your annual leave records, appraisal and performance information
 - v) Internal and external modules undertaken
 - vi) Information on time off work including sickness absence, family related leave etc

How Personal Data Is Collected

The majority of personal data that CCTV Monitoring Ltd. processes is provided by individuals providing their data to the company directly. This is for the following reasons:

- Individuals have made an information request to the company.
- Individuals have provided information when signing a contract.
- Individuals have made an enquiry to the company.
- Individuals have given details in a keyholder form for sites.
- Individuals have applied for a job with the company.
- Individuals have given information in phone calls which are recorded.
- Individuals engage on social media, providing personal data.

CCTV Monitoring Ltd. also receive some personal data from indirect sources, in the following scenarios:

- Customer's distribute personal data of employees.
- Employee's give contact details as an emergency contact or a referee.

Special Categories of Data

Special categories of data are data relating to your:

- a) health
- b) sex life
- c) sexual orientation
- d) race
- e) ethnic origin
- f) political opinion
- g) religion
- h) trade union membership
- i) genetic and biometric data.

We carry out processing activities using special category data:

- a) for the purposes of equal opportunities monitoring
- b) in our sickness absence management procedures
- c) to determine reasonable adjustments

Most commonly, we will process special categories of data when the following applies:

- a) you have given explicit consent to the processing
- b) we must process the data in order to carry out our legal obligations
- c) we must process data for reasons of substantial public interest
- d) you have already made the data public.

Activity Requiring Your Data	Lawful Basis
Carry out the employment contract that we have entered into with you e.g. using your name, contact details, education history, information on any disciplinary, grievance procedures involving you	Performance of the contract
Ensuring you are paid	Performance of the contract
Ensuring tax and National Insurance is paid	Legal obligation
Carrying out checks in relation to your right to work in the UK	Legal obligation
Making reasonable adjustments for disabled employees	Legal obligation
Making recruitment decisions in relation to both initial and subsequent employment e.g. promotion	Our legitimate interests
Making decisions about salary and other benefits	Our legitimate interests
Ensuring efficient administration of contractual benefits to you	Our legitimate interests
Effectively monitoring both your conduct, including timekeeping and attendance, and your performance and to undertake procedures where necessary	Our legitimate interests
Maintaining comprehensive up to date personnel records about you to ensure, amongst other things, effective correspondence can be achieved and appropriate contact points in the event of an emergency are maintained	Our legitimate interests
Implementing grievance procedures	Our legitimate interests
Assessing training needs	Our legitimate interests
Implementing an effective sickness absence management system including monitoring the amount of leave and subsequent actions to be taken including the making of reasonable adjustments	Our legitimate interests
Gaining expert medical opinion when making decisions about your fitness for work	Our legitimate interests
Managing statutory leave and pay systems such as maternity leave and pay etc	Our legitimate interests
Business planning and restructuring exercises	Our legitimate interests
Dealing with legal claims made against us	Our legitimate interests
Preventing fraud	Our legitimate interests
Ensuring our administrative and IT systems are secure and robust against unauthorised access	Our legitimate interests
Providing employment references to prospective employers, when our name has been put forward by the employee/ex-employee, to assist with their effective recruitment decisions	Legitimate interest of the prospective employer

Failure To Provide Data

Your failure to provide us with data may mean that we are unable to fulfil our requirements for entering into a contract of employment with you. This could include being unable to offer you employment, or administer contractual benefits.

Who We Share Your Data With

Employees within our company who have responsibility for recruitment, administration of payment and contractual benefits and the carrying out performance related procedures will have access to your data which is relevant to their function. All employees with such responsibility have been trained in ensuring data is processed in line with GDPR. Data is shared with third parties for the administration of payroll and the screening process.

Protecting Your Data

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

Retention Periods

We only keep your data for as long as we need it for, which will be at least for the duration of your employment with us though in some cases we will keep your data for a period after your employment has ended. Some data retention periods are set by the law. Our retention period is 7 years from the last day of your employment.

Why Your Personal Data Is Collected and How It Is Processed

The personal data that CCTV Monitoring Ltd. process is used to:

- Verifying the identity of individuals.
- Informing individuals about products and services.
- Processing orders
- Paying suppliers
- Conduct market research
- Compiling customer reviews
- Improving the design of the company website
- Enabling individuals to share company content using social media
- Dealing with any query submitted to customer services

How Personal Data Is Stored

All employees of CCTV Monitoring Ltd. are aware that personal data must be securely controlled.

Any electronic data will be kept and stored in a confidential and secure manner using modern software. Access to said data will be limited to personal who require legitimate access. When data is computerised, it will be coded and encrypted on both a local hard drive and a network drive that is backed up. If data is stored on portable storage, that device must be stored in locked storage when not in use and any data that is stored must be encrypted. Only necessary data will be stored on portable storage devices. When the data is deleted, it will be done safely so that the data is irrecoverable. Appropriate back-up and disaster recovery solutions will also be in place.

CCTV Monitoring Ltd. tries to reduce the amount of data that is stored as a physical document. Where it is necessary to store personal data as a physical document it will be stored in locked storage and restricted to permissible people.

How Long Personal Data Is Stored

CCTV Monitoring Ltd. will keep individual's data for as long as said data is relevant and useful for the purpose for which it was originally collected. When the data is no longer needed to be used it will be erased in such a way that it is irrecoverable.

Individual Data Protection Rights

CCTV Monitoring Ltd. has processes in place to ensure that any requests made by individuals under data protection law can be facilitated. All requests will be considered without unnecessary delay and within one month of receipt.

Data subjects are allowed to exercise their rights covered, which are:

- The right to know how personal data is used in clear and transparent language.
- The right to know and have access to the personal data being held about them.
- The right to receive and transfer data in a common and machine-readable electronic format.
- The right to have their personal data removed.
- The right to have data corrected where it is inaccurate or incomplete.
- The right to complain and object to processing.
- The right to limit the extent of the processing of the individual's personal data according to their wishes. The right not to be subject to decisions without human involvement.

Contact

Individuals wishing to exercise their rights or make a request may do so by contacting the Data Protection Officer:

David Forward

david.forward@cctvmon.com

Gannex House
Gannex Park
Dewsbury Road
Elland
West Yorkshire
HX5 9AF
01422 480 010

Individuals wishing to lodge a complaint can either contact the Data Protection Officer listed above or can contact the Information Commissioner's Office (ICO) listed below.

Information Commissioner's Office

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
0303 123 1113

Review

The Privacy Notice will be reviewed yearly or when necessary to assess whether changes need to be made to it and whether it is still applicable.