



Privacy Notice for McElwaine Security Services Ltd

We want you to know that when you use our organisation you can trust us with your information. We are determined to do nothing that would infringe your rights or undermine your trust. This Privacy Notice describes the information we collect about you, how it is used and shared, and your rights regarding it.

Data Controller

We are registered with the Information Commissioner's Office (ICO) as a Data Controller for the personal data that we hold and process. Our registered address is Marketyard, 184B Main Street, Lisnaska, Co. Fermanagh, BT92 0JE, our ICO registration number is Z3243475 and our Data Protection Lead (DPL) is Marcus Hunter. Our Data Protection Officer/Lead can be contacted at info@mcelwainesecurity.com.

Data Collection

All or the vast majority of the information that we hold about you is provided to us by yourself when you seek to use our services, or you are employed by us or work within various capacities. We will tell you why we need the information and how we will use it.

Personal data is any information that can be used to identify an individual, and it can range from the most basic of details such as contact information through to more complex data.

Identification can be by the information alone or in conjunction with any other information. The processing of personal data is governed by both the UK- General Data Protection Regulation (the GDPR) and the Data Protection Act 2018.

However, not all personal data is considered equal. There are two different categories: 'personal data' and 'special categories of personal data'.

We collect and process both personal data and special categories of personal data as defined in the GDPR. This includes:

- Personal and family information, including names, dates of birth, and personal contact details.
- National Insurance details.
- Driving license details.
- Financial details such as financial status and bank details.
- Records of goods and services relevant to the business.



- Records of education, training and employment.
- Photographs.
- Vehicle Tracking Data

Sensitive and special data including:

- Information used for equal opportunities monitoring about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Information about your health, including any medical condition, health and sickness records.
- Right to work in the UK and relevant UK VISA; and
- Information about criminal convictions and offences obtained through Access NI Checks, Police/Garda Checks, DVLA and Credit Checks.

How Do We Collect Information?

We collect data about you in a variety of ways and such as when we undertake a recruitment exercise, throughout the course of your employment, when you open an account with us, request a quote, request a product guide or place an order for our services. We also collect information when you voluntarily complete customer surveys and provide feedback. Website usage information is collected using cookies.

We may also obtain information from third parties such as governmental bodies and employment referees.

We comply with our obligations under the GDPR:

- by collecting and retaining only data necessary to pursue our legitimate business interests
- by ensuring that appropriate technical measures are in place to protect personal data
- by keeping personal data up to date.
- by storing and destroying data securely.



We use your information to:

- Process information necessary for the provision of employment.
- Provide goods, services, deliveries, quotations, and information, for example, catalogues and newsletters.
- Process or support payments for goods and services.
- Improve our products and services.
- Maintain the safety, security and integrity of our services.
- Direct your enquiries to the appropriate customer support staff.
- Investigate and address your concerns.
- Communicate with you about products, services, promotions, studies, surveys, news, updates and events.
- Make statutory returns as required by law.
- Complying with health and safety obligations.
- Equal opportunities monitoring.
- Respond to requests for references.

- Or as otherwise required or permitted by law.

We do not use automated decision-making in the processing of your personal data.

Our Lawful Basis for processing your information:

The General Data Protection Regulation (GDPR) requires all organisations that process personal data to have a Lawful Basis for doing so. The Lawful Bases identified in the GDPR are:

- Consent of the data subject.
- Performance of a contract with the data subject or to take steps to enter into a contract.
- Compliance with a legal obligation.
- To protect the vital interests of a data subject or another person.
- Performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
- The legitimate interests of ourselves, or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject.



Examples of legitimate interests include:

- Where the data subject is a client or in the service of the controller.
- Transmission within a group of undertakings for internal administrative purposes.
- Processing necessary to ensure network and information security, including preventing unauthorised access.
- Processing for direct marketing purposes, or to prevent fraud; and
- Reporting possible criminal acts or threats to public security.

Our Lawful Basis is for the performance of a contract, consent and Legitimate Interest.

Legal Contract

We are required to process personal information to enter into and fulfil various obligations for contracted services or relating to employment contracts.

Legitimate Interest

We will rely on the legitimate interest of McElwaine Security Services Ltd when processing information for the purposes set out above to include the management, administration and operation of our organisation, for all business development and marketing purposes, to conduct all employment functions and obligations, to comply with all regulatory functions required by professional regulators.

Consent

On occasion we may rely upon your consent particularly in relation to our marketing activity. At all times you retain the right to withdraw your consent. Where we have relied upon your consent and you opt to withdraw it this does not invalidate our lawful basis for processing data historically.

Special category processing

If we are processing special categories of data such as medical records pertaining to our employees, we are entitled by law to do so where it is necessary for the purposes of employment law and to support individuals with a particular disability or medical condition. We may also obtain your consent to process this type of data.



Criminal data processing

On occasion, we may process data relating to criminal offences where it is necessary for the purpose of your employment. We are allowed to use your personal information in this way to carry out our obligations to comply with Standard BS7858 + PSA74:2019.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We may also request your specific consent to process this type of data.

We may share your personal data with:

- Third party providers for employment purposes such as payroll, pension provider etc.
- Delivery partners.
- Our business partners.
- Our legal advisors in the event of a dispute or other legal matter.
- Law enforcement officials, government authorities, or other third parties to meet our legal obligations; and
- Any other party where we ask you and you consent to the sharing.

Transfers to third countries and international organisations:

We do not transfer any personal data to third countries or international organisations outside of the UK.

Where we are processing personal data pertaining to EEA citizens, we have satisfied ourselves that such transferred data is fully protected and safeguarded as required by the EU- General Data Protection Regulation.

We retain your personal data while you remain an employee, client, prospect client or job applicant, unless you ask us to delete it. Our Retention and Disposal Policy (copy available on request) details how long we hold data for and how we dispose of it when it no longer needs to be held. We will delete or anonymise your information at your request unless:

- There is an unresolved issue, such as claim or dispute.
- We are legally required to; or



- There are overriding legitimate business interests, including but not limited to fraud prevention and protecting customers' safety and security.

Your Rights

The General Data Protection Regulation gives you specific rights around your personal data. For example, you have to be informed about the information we hold and what we use it for, you can ask for a copy of the personal information we hold about you, you can ask us to correct any inaccuracies with the personal data we hold, you can ask us to stop sending you direct mail, or emails, or in some circumstances ask us to stop processing your details. Finally, if we do something irregular or improper with your personal data you can seek compensation for any distress you are caused or loss you have incurred. You can find out more information from the ICO's website <https://ico.org.uk/your-data-matters/> and this is the organisation that you can complain to if you are unhappy with how we deal with you.

Accessing and Correcting Your Information

You may request access to, correction of, or a copy of your information by contacting us at info@mcelwainesecurity.com.

Marketing Opt-Outs

You may opt out of receiving emails and other messages from our organisation by following the instructions in those messages.

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 web page 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 of interest. However, once you have used these links to leave our site, you should note that we do 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.

We will occasionally update our Privacy Notice. When we make significant changes, we will notify you of these through either email or alternatively we will also publish the updated Notice on our website.