

# GUARDFORCE SECURITY LIMITED

Protection with Intelligence

## DATA Protection (GDPR) POLICY

DATE:	August 2023	Objective – To maintain the ethical approach to business through policy process and awareness
ISSUE:	1	
REVIEW DATE:	August 2024	
POLICY NUMBER	GFS- POL - 005	

### SCOPE

The Data Protection Act (DPA) 1998 regulates the processing of information relating to individuals, this includes the obtaining, holding, using or disclosing of such information, and covers computerised records as well as manual filing systems and card indexes.

GFS will hold the minimum personal information necessary to enable it to perform its functions. All such information is confidential and needs to be treated with care, to comply with the law. This applies to GFS and its operations, personnel, third party consultants, contractors and vendors.

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	APPROVED	DISTRIBUTION
	Robert Hanratty (Compliance Manager)	1. Master file (S-Drive)



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## *1. Introduction*

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Guardforce Security Limited Office 2 Anglo House 43 – 45 Butts Green Road Hornchurch Essex RM11 2JS, UK is committed to preserving your privacy. Please read the following privacy policy to understand how we use and protect the information that you provide to us.

When we refer to “GUARDFORCE”, “we”, “us” or “our”, we are referring to Guardforce Security Limited, and as applicable any member of our group, including our subsidiaries, as defined in section 1159 of the UK Companies Act 2006, who are the data controllers. This privacy policy applies to our processing of personal data when you use our services, visit our websites or mobile applications or otherwise interact with us.

It is important for us to process and use your data only in accordance with the General Data Protection Regulation (“GDPR”, from the GDPR implementation date) or, until GDPR implementation date, the Data Protection Act 1998, (collectively the “Data Protection Laws”) and your expectations, and to be transparent with you in how we process and use your data.

This privacy policy will explain what data is collected, why it is collected, how the collected data is used and your options and rights regarding the collection of your personal data.

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## *2. Who we are*

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We are an international supplier providing services, as set out on our website, to the facilities and premises owned by our clients. From humble beginnings as a small business over 15 years ago, we’ve grown our specialisms and expertise to offer a range of high quality, sustainable and internationally accredited services. As a private, owned business we are not like public limited companies. Where other companies must focus on meeting short term targets, our private ownership enables us to make long term investments. This means we have strong relationships with our clients and longevity in the services we provide to them. We are all about supporting our clients’ long-term vision and objectives. We work at the heart of our clients’ businesses, and our sector expertise means we can design sustainable service solutions that align with their business strategies.

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### *3. What data we collect*

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In connection with the different ways we may interact with you and the various services that we provide, we collect the following categories of data (G=Guardforce category):

**G1:** Contact information, including name, address, telephone number and e-mail address.

**G2:** Identity data, including gender and date of birth.

**G3:** Communication data between you and us, including recordings of calls to our control room or offices, e-mail communication, online chats, comments and reviews collected through surveys or posts on social media platforms.

**G4:** Digital information data collected when you visit our websites, applications or other digital platforms, including IP-addresses, browser data, traffic data, social media behaviour, and user patterns. If you subscribe to our newsletters, we may collect data regarding which newsletters you open, your location when opening them and whether you access any links inserted in the newsletters.

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### *4. Where we collect your data from*

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Most of the data that we have about you are provided by you. We collect G3 and G4 data from our websites, applications and similar digital platforms.

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### *5. Use of your information*

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#### **Communication**

**Description:** We use G1, G2 and G3 data to ensure that we can supply the goods or services you have requested. We may provide such information by electronic or other means.

**Legal basis:** We use such data as part of our business relationship. Further, we use such data to provide you with other information necessary to fulfil our legitimate interests, including to ensure that we process invoices and to contact you, where necessary, concerning any orders you may place or services you supply to GUARDFORCE.

**Disclosure:** We may disclose G1 and G2 data to our corporate partners, as they may need this information to communicate with you and to provide support and assistance.

## Direct Marketing

**Description:** We may use G1, G2 and G4 data to provide you with newsletters from us about our products and services.

**Legal basis:** Our use of such data is based on our legitimate interests in providing you with relevant information to promote our products and services. You may at any time opt out of receiving such information.

**Disclosure:** We may process your data to enable us to send you relevant information to promote our products services.

## Profiling

**Description:** We may use and compile G1, G2, G3 and G4 data for profiling purposes. Profiling is an automated processing of personal data where your personal data is used to evaluate, analyse and predict your preferences, interests and behaviour (profiling). We may use this data to provide you with customised information about services and offers that you may appreciate.

**Legal basis:** We carry out profiling to fulfil a legitimate interest, which is to customise our services for your benefit. You may at any time object to our use of your personal data for profiling purposes.

**Disclosure:** We will not disclose the profiles we have generated based on your data to third parties other than any member of our group.

## Security

**Description:** We may carry out video surveillance on premises and store G4 data to prevent crime and ensure your safety.

**Legal basis:** We carry out video surveillance that is necessary to fulfil a legitimate interest which is to prevent crime and ensure your safety while you are on our premises.

**Disclosure:** We will not disclose video surveillance footage to third parties unless required by law or on request from authorities.

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## *6. How long we store your data for*

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We will only store your data for as long as it is necessary to fulfil the purpose of the processing of your data.

We will store your G1, G2, G3, G4 data from the point for the duration of our contractual relationship and up to a period of three years after our contractual relationship has ended, if we believe this is necessary to handle potential complaints or claims. We may store your data longer if you wish for us to keep your data and you have consented to this.

We will store G4 data as required by applicable law.

We will store your G1, G2 G3 & G4 data for as long as you wish to receive information and marketing communications from us where necessary.

We store video surveillance footage for a period of 31 days. The system has an overwrite facility thereafter and all data is deleted. If we deem it necessary to deliver video surveillance footage to the police due to a criminal incident or similar, we may store the video surveillance footage for legal reasons.

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### *7. International transfer of data*

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GUARDFORCE provides services worldwide and has operations and partners on all continents. We have affiliates, agents and corporate partners that are established in these jurisdictions outside of the European Economic Area to which we may transfer data, as described in section 5 above. We will ensure that your data is adequately protected by the receiving parties in such countries. Adequate protection may typically be to impose on the receiving party contractual obligations that ensure that it maintains the same level of privacy and data security as practised by us. You may ask for further information or a copy of the safeguards that we have in place to ensure lawful transfer of your data.

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### *8. Disclosure of your information*

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The information you provide to us will be held on our computers and may be accessed by companies within our group of companies who act for us for the purposes set out in this privacy policy or for other purposes approved by you. Those parties process information, fulfil and deliver orders, process payments and provide support services on our behalf.

Where you have provided us with your details for marketing purposes, we will not share this with or permit other companies in our network, to contact you about their related products and services without your prior consent.

If we pass your information to non-EEA/International organisations for processing on our behalf, we will ensure the appropriate level of protection is offered to your information, to ensure its protection as per the Data Protection Laws, while taking into account that the non-EEA country may not have equivalent data protection and privacy laws to the EEA.

Finally, if our business or part of it enters into a joint venture with or is sold to or merged with another business entity, your information may be disclosed to our new business partners or owners. Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.

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### *9. Security*

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We take appropriate measures to ensure that any personal data is kept secure, including security measures to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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## *10. How you can access, rectify or erase your data and file complaints*

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Under the General Data Protection Regulation, you have a number of important rights. In summary, those include rights to:

- Access to your personal data and to certain other supplementary information that this privacy policy is already designed to address;
- Require us to correct any mistakes in your information which we hold;
- Require the erasure of personal data concerning you in certain situations;
- Receive the personal data concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit the data to third parties in certain situations;
- Object at any time to processing of personal data concerning you for direct marketing;
- Object in certain other situations to our continued processing of your personal data;
- Otherwise restrict our processing of your personal data in certain circumstances;
- Claim compensation for damages caused by our breach of any data protection laws.

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individual's rights under the General Data Protection Regulation.

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## *11. Cookies*

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We use cookies on the websites to ensure functionality on the website, analyse website traffic and to see which areas of the website you have visited. Please read our cookie policy for more information.

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## *12. Complaints*

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If you wish to make a complaint about how your personal data is being processed by GUARDFORCE Group (or third parties), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and GUARDFORCE'S data protection representatives. Please see the relevant contact details below.

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### *13. GUARDFORCE contact details*

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Guardforce Security Limited Office 2 Anglo House 43 – 45 Butts Green Road Hornchurch Essex RM11 2JS, UK

[robert@guardforcesecurity.co.uk](mailto:robert@guardforcesecurity.co.uk) and [warren@guardforcesecurity.co.uk](mailto:warren@guardforcesecurity.co.uk)

Supervisory authority contact details:

The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF, United Kingdom. Tel: +44 (0) 303 123 1113

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### *14. Changes to our privacy policy*

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Any changes to our privacy policy in the future will be posted to our website and, where appropriate, through e-mail notification.

#### Document History

April 2019	Issue 1	Initial Document
April 2020	Issue 1	Annual Review
April 2021	Issue 1	Annual Review
April 2022	Issue 1	Annual Review
August 2022	Issue 1	Personnel Change
August 2023	Issue 1	Annual Review