

Fal Fire Protection Limited, T/a Fal Fire & Security

Privacy Notice Statement to Customers.

What this is about:-

On 25 May 2018, new EU Data Protection Regulations come into force. They require any organisation that keeps or processes information about people that could identify them, to comply with its directives and this includes sending them a Privacy Notice explaining certain things about what information we hold and how and why we process it.

Fal Fire is committed to keeping your personal data private. We shall process any personal data we collect from you in accordance with Data Protection Legislation and the provisions of this Privacy Notice. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

Data Protection Legislation means (i) before 25 May 2018, the EU Data Protection Directive 95/46 and all national implementing laws (including the UK Data Protection Act 1998); and (ii) on or after 25 May 2018, the EU General Data Protection Regulation 2016/679 ("**GDPR**"); together with all other applicable and national implementing legislation relating to privacy or data protection; and where we use the terms "**personal data**", "**data subject**", "**controller**", "**processor**" and "**process**" (and its derivatives), such terms shall have the meanings given to them in the Data Protection Legislation.

DATA CONTROLLER

For the purpose of the GDPR Fal Fire is the data controller of your information. This means that we are responsible for deciding how we hold and use your personal data. We are required under Data Protection Legislation to notify you of the information contained in this Privacy Notice.

DATA PROTECTION OFFICER

We have appointed a Data Protection Officer (**DPO**) to oversee compliance with this Privacy Notice. If you have any questions about this Privacy Notice or how we handle your personal data, please contact the DPO at the contact details set out below.

COLLECTING INFORMATION FROM YOU

Fal Fire will collect and process your personal data you provide us through application forms, our website, face-to-face and electronic communication (including telephone conversations) in order to provide our services to you. All of this data is provided voluntarily by you in order for us to deliver the service to you and you own customers. Where premises are controlled by you, which requires you to provide us with personal information FROM YOUR OWN CUSTOMERS, we are still bound by the requirements of this GDPR, and rely upon you to be compliant with the letter and the spirit of the GDPR in this regard.

THE KIND OF INFORMATION WE HOLD ABOUT YOU

We may collect, store, and use some or all the following categories of personal data about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal and or business email addresses.
- Details relating to the worksite premises where we deliver our services to you such as address, telephone numbers and email addresses. This information is supplied to us by you or your agents.
- Details relating to occupants of the worksite premises including the address, their names, telephone numbers and email addresses. **IT IS EXTREMELY IMPORTANT THAT YOU, AS THE DATA CONTROLLER OF YOUR OWN CUSTOMERS' PERSONAL INFORMATION, undertake your own GDPR process, including ensuring you have a legal mandate to hold and share their information, under this legislation. We accept this information in good faith as having been so processed.**

- Information collected from publicly available sources such as Companies House. Such third parties may include fraud prevention agencies, banks, merchants and credit reference agencies.
- Other information about an individual that you or they disclose to us when communicating with us
- CCTV footage and other information obtained through electronic means such as recording conversations on the telephone, which may be collected as you enter our premises or when you discuss matters on the telephone.
- Photographs –this is unusual and would be for purposes of identification at certain sensitive sites, and by discussion and agreement with you, the customer or any individuals whose photographs were to be used.
- IP addresses –these are collected by our website to log visitors and where they are from. Web services routinely keep a log of their users’ IP addresses. These logs are used for numerous largely mundane and innocuous purposes, such as to provide customized features to particular users, to prevent or enable access to content, or to blacklist IP addresses involved in “denial of service” attacks against a site. We do not have enough information on our customers or website users to enable us to identify individuals from IP addresses unless they have elected to register and acquire a logon. You can disable this function as follows:

*Open Internet Explorer > Internet Options > Privacy tab. Under Location check **Never allow websites to request your physical location**. Also press the **Clear Sites** button to remove old sites which have access to your physical location.*

- Cookies:
 - These are generally generated when you log on to our website for Google Analytics to see how people use our website, and are anonymous statistics. The cookies collect information in an anonymous form, including the number of visitors to the site, how visitors were directed to the website, and the pages they have visited. This is to improve the website experience for users.
 - There may also be cookies associated with the use of our website for customers who register for an account on our website, to access more services and information.

You may refuse to accept cookies by activating the setter on your browser as follows

***To Disable, Enable Cookies in Internet Explorer.** Open **Internet Explorer** and click the **Tools** button. Next click **Internet Options** and select the **Privacy** tab. Under **Settings**, move the slider to the top to **block all cookies** or to the bottom to **allow all cookies**, and then click **Apply**.*

This allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site. For information on how to control and/or disable your cookies please search in the settings toolbar or your pc or MAC.

LAWFUL GROUNDS FOR USING YOUR INFORMATION

We are permitted to process your personal data in compliance with Data Protection Legislation by relying on one or more of the following lawful grounds:

- You have explicitly agreed to us processing such information for a specific reason.
- The processing is necessary to perform the agreement we have with you or to take steps to enter into an agreement with you.
- The processing is necessary for compliance with a legal obligation we have.
- The processing is necessary for the purposes of a legitimate interest pursued by us, which might be:
 - to provide services to you and to notify you that services are due
 - to send you invoices following the provision of services
 - Reminders that bills are due or overdue for payment
 - to ensure that our customer accounts are well-managed;
- To prevent, detect, investigate and prosecute fraud and alleged fraud, money laundering and other crimes and to verify your identity in order to protect our business and to comply with laws that apply to us and/or where such processing is a contractual requirement of the services
- To protect our business interests;
- To ensure that complaints are investigated;
- To keep our customers informed about relevant services, **unless you have indicated at any time that you do not wish us to do so.**

You are at liberty to withdraw your consent for us to have and process your information at any time. However in practice, this would result in our company being unable to continue to effectively provide you with the services we are in business to provide.

PURPOSES OF PROCESSING

Specifically, we and any of our other group companies may use your information for the following purposes and under the following legal bases:

How we use your information	Legal basis
To provide and manage your account(s) and our relationship with you	<ul style="list-style-type: none"> • Where necessary for the performance of our agreement or to take steps to enter into an agreement with you • Where the law requires this • Where it's in our legitimate interests to ensure that our customer accounts are well-managed, so that our customers are provided with a high standard of service, to protect our business interests and the interests of our customers
To give you statements and other information about your account or our relationship	<ul style="list-style-type: none"> • Where necessary for the performance of our agreement or to take steps to enter into an agreement with you • Where the law requires this
To handle enquiries and complaints	<ul style="list-style-type: none"> • Where necessary for the performance of our agreement or to take steps to enter into an agreement with you • Where the law requires this • Where it's in our legitimate interests to ensure that complaints are investigated, for example, so that our customers receive a high standard of service and so that we can prevent complaints from occurring in future
To provide our services to you	<ul style="list-style-type: none"> • Where necessary for the performance of our agreement or to take steps to enter into an agreement with you • Where the law requires this
For assessment, testing (including systems tests) statistical, market and product analysis and market research. [We may use this information to prepare statistical reports to be shared internally or with our group companies. We compile these reports from information about you and our other customers. The information in these reports is never personal and you will never be identifiable from them].	<ul style="list-style-type: none"> • Where the law requires this • Where it's in our legitimate interests to develop, build, implement and run business models and systems which protect our business interests and provide our customers with a high standard of service
To evaluate, develop and improve our services to you and other customers	<ul style="list-style-type: none"> • Where it's in our legitimate interests continually to evaluate, develop or improve our products as well as the experiences of users of our sites, so that our customers are provided with a high standard of service
To protect our business interests and to develop our business strategies	<ul style="list-style-type: none"> • Where it's in our legitimate interests to protect our people, business and property and to develop our strategies • Where necessary for the performance of our agreement or to take steps to enter into an agreement with you • Where the law requires this
To contact you, by post, phone, text, email and other digital methods. This may be: <ul style="list-style-type: none"> • to help you manage your accounts • to meet our regulatory obligations • to keep you informed about products and services you hold with us and to send you information about products or services (including those of other 	<ul style="list-style-type: none"> • Where the law requires this • Where we have agreed to contact you in our agreement • Where the law requires this • Where you agree • Where it's in our legitimate interests to share information with our customers about products / services that may be relevant and beneficial to them. Where we send you marketing messages, you can always tell us when you no longer wish to receive them. There is a Contact link on our website where you can contact us

How we use your information	Legal basis
companies) which may be of interest to you	
To collect any debts owing to us	<ul style="list-style-type: none"> • Where it's in our legitimate interests to collect any debts owing to us
To meet our regulatory compliance and reporting obligations and to prevent, detect, investigate and prosecute fraud and alleged fraud, money laundering and other crimes. We may record your image on CCTV when you visit our premises.	<ul style="list-style-type: none"> • Where the law requires this • Where it's in our legitimate interests to prevent and investigate fraud, money laundering and other crimes • Where such processing is a contractual requirement of the services you have requested
To assess any application for services you make, including carrying out fraud, money laundering, identity, sanctions screening and any other regulatory checks.	<ul style="list-style-type: none"> • Where you have made data public • Where such actions are in our legitimate interests, for the protection of our business interests • Where the law requires this
To monitor, record and analyse any communications between you and us, including phone calls	<ul style="list-style-type: none"> • Where it's in our legitimate interests, to check your instructions to us, to prevent and detect fraud and other crime, to analyse, assess and improve our services to customers, and for training, for the enhancement of our customer service provision and protection of our business interests
To transfer your information to or share it with any third party to whom your account has been or may be transferred following a restructure, sale or acquisition of any group company	<ul style="list-style-type: none"> • Where necessary for the performance of our agreement with you • Where we have a legitimate interest in restructuring or selling part of our business
To share your information with UK or other relevant tax authorities, credit reference agencies, fraud prevention agencies, and UK and overseas regulators and authorities	<ul style="list-style-type: none"> • Where the law requires this • Where we have a legitimate interest in performing certain credit checks so that we can make responsible business decisions. As a responsible organisation, we need to ensure that we only provide certain products to companies and individuals where the products are appropriate, and that we continue to manage the services we provide, for example if we consider that you may have difficulties making a payment to us. • Where we have a legitimate interest in assisting with the prevention and detection of fraud and other crime • Where we have a legitimate interest in assisting UK and overseas regulators, who monitor companies to ensure that they comply the law and regulations
To share your information with our partners and service providers	<ul style="list-style-type: none"> • Where necessary for the performance of our agreement • Where we have a legitimate interest in using third parties to provide some services for us. Third parties may include such organisations as the <ul style="list-style-type: none"> ○ SSAIB, who audit us, and retain the information relating to audited sites for their own records. SSAIB have their own published Privacy Notice. ○ Alarm receiving centres who process and monitor information relating to some alarms systems where this has been set up on request of the customer. The alarm receiving centre we use is EMCS, who also have their own published Privacy Notice.

INFORMATION SHARING

We keep all your personal data confidential. However, in order to be able to service your needs to the best of our ability, we may share any information you provide to us with our group companies and their agents, counterparties and support service or data providers, wherever located. This may include contact and site information, shared with subcontractors who may be required to carry out specialist works for us. If you have provided information to other members of our group, those entities may also share that information with us. We will ensure that if we share such information with third parties, any such disclosure is at all times in compliance with Data Protection Legislation.

To help us provide services, your data will be processed internally and externally by other third parties. We may use third parties for administrative, servicing, monitoring and storage of your data. We will outsource some services to third parties whom we consider capable of performing the required processing activities so that there is no reduction in the service standard provided to you by us. For example, in order to facilitate sharing of customer documentation with them (customers) we have data shared with and available to customers stored on Google Drive which is a trusted and highly secure platform.

The recipients or categories of recipients, of your information may be:

- UK and overseas regulators and authorities in connection with their duties (such as crime prevention).
- Anyone to whom we may transfer our rights and/or obligations;
- Any other person or organisation after a restructure, sale or acquisition, as long as that person uses your information for the same purposes as it was originally given to us or used by us (or both).
- Credit reference, identity and address verification organisations who may record and use your information and disclose it to other lenders, financial services organizations and insurers. Your information may be used by those third parties to make assessments in relation to your creditworthiness for debt tracing or giving credit for the supply of services..
- Fraud prevention agencies and law enforcement agencies who will use it to prevent fraud and money-laundering and to verify your identity if false or inaccurate information is provided by you and fraud is identified. We, fraud prevention agencies and law enforcement agencies may access and use your information for example, when:
- Checking details on applications for credit and credit related or other facilities;
- Managing credit and credit related accounts or facilities;
- Recovering debt;

RETENTION AND DISPOSAL OF DATA

We will only keep the information we collect about you on our systems or with third parties for as long as required for the purposes set out above or as required to comply with any legal obligations to which we are subject. This will involve us regularly reviewing our files to check that information is accurate and up-to-date and still required.

We will normally destroy or erase data after statutory timelines lapse. However, we may retain your information, or information relating to your account after you cease to be a customer for longer than this, provided it is necessary for a legal, regulatory, fraud prevention or other legitimate business purpose. An example of this would be where we are required to continue hold information on fire alarms systems we have serviced as a requirement of our regulatory body, BAFE.

STORAGE OF YOUR PERSONAL DATA AND DATA SECURITY

All information you provide to us is stored in our secure servers or those of trusted third parties such as Google Drive. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know basis. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

MARKETING INFORMATION

We and other members of our group may use your information from time to time to inform you by letter, telephone, text (or similar) messages, email or other electronic means, about similar services which may be of interest to you or them.

You, may, at any time, request that we cease or do not send such information by one, some or all channels, by contacting us using the contact details set out below.

RIGHTS OVER YOUR PERSONAL DATA

Under certain circumstances, by law you have the right to:

- Be informed about the processing of your personal data (i.e. for what purposes, what types, to what recipients it is disclosed, storage periods, any third party sources from which it was obtained, confirmation of whether we undertake automated decision-making, including profiling, and the logic, significance and envisaged consequences).
- Object to your personal data being processed for a particular purpose or to request that we stop using your information.
- Ask us to transfer a copy of your personal data to you or to another service provider or third party where technically feasible and otherwise required by applicable regulations.
- Withdraw, at any time, any consent that you have previously given to us for our use of your personal data.
- Ask us to stop or start sending you marketing messages at any time.
- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your working relationship with us.
- Request the erasure of your personal data. This enables you to ask us to delete or remove personal data where you think that we do not have the right to process it.

Any request for access to or a copy of your personal data must be in writing and we will endeavour to respond within a reasonable period and in any event within one month in compliance with Data Protection Legislation. We will provide this information free of charge unless the request is manifestly unfounded or excessive. We will comply with our legal obligations as regards any individual's rights as a data subject.

If you would like to contact us in relation to any of the rights set out above please contact us using the following contact details. To protect your privacy and security, we may take reasonable steps to verify your identity before providing you with the details.

Jan Elizabeth Blackler, Data Protection Officer, Fal Fire & Security, Unit 11, The Beehive Units Kernick Industrial Estate, Parkengue Penryn, TR10 9EP

RIGHT TO COMPLAIN TO THE ICO (Information Commissioners Office)

You can contact the ICO if you have any concerns about how Fal Fire has handled your personal data and you also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. You can contact the ICO via their helpline on 0303 123 1113. You can find out more information about your rights as a data subjects, their regulatory powers and actions they can take on their website <https://ico.org.uk/>

THIS PRIVACY NOTICE

The content or services mentioned on our website may be changed in future and consequently this Privacy Notice may also change. Any changes we may make to this Privacy Notice in the future will be posted on this page and where appropriate, notified to you by email. We recommend that you re-visit this page regularly and inform us if you do not agree to any term mentioned here.

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