

# PRIVACY POLICY

Gatehouse Security Limited ("Gatehouse", "we", "us" or "our") is a company incorporated in England and Wales with company number 07227741. Our registered office is 32 Lower Village, Haywards Heath, West Sussex RH16 4GS.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, or that we obtain from other sources will be processed by us when you:

- use our services; and/or
- purchase products from us.

## 1 BASIS FOR PROCESSING PERSONAL DATA

**1.1** Sections 1.2 – 1.7 below explain how and why we process your personal data, as well as the legal basis on which we carry out this processing.

**1.2 To enter contracts with you:** Where you order goods and/or services from us, we will process your personal data to process your order so that we can deliver these goods and/or provide services to you. Our use of personal data in this way includes sharing your personal data with our staff, suppliers, delivery companies and other potential subcontractors.

The legal basis on which we process your personal data in this way is the necessity to be able to enter into and perform the contract for the sale of goods and/or services you have requested from us. If you do not wish to provide us with your personal data in this way, you will be unable to purchase goods and/or services from us.

**1.3 To respond to your queries and complaints:** Handling the information you have sent us enables us to respond to you. We may also keep a record of these to inform any future communication with us and to demonstrate how we communicated with you.

The legal basis on which we do this are our contractual obligations to you, our legal obligations and our legitimate interests in providing you with the best service and understanding how we can improve our service and products based on your experience.

**1.4 To send you relevant, personalised communications by email or post in relation to updates, offers, services and products.**

We'll do this on the basis of our legitimate business interest. Of course, you are free to opt out of receiving these requests from us at any time by updating your preferences by emailing us at [info@gatehousesecurity.co.uk](mailto:info@gatehousesecurity.co.uk) or by phoning Customer Services on 01444 473396 / 07921 438744.

**1.5 To send you communications required by law or which are necessary** to inform you about our changes to the services we provide you. For example, updates to this Privacy Notice, product recall notices, service reminders and legally required information relating to your orders. These service messages will not include any promotional content and do not require prior consent when sent by email or text message.

**1.6 Sometimes, we'll need to share your details with a third party who is providing a service** (such as delivery couriers). We do so to fulfil our contractual commitments to you in connection with your order(s).

Without sharing your personal data, we'd be unable to fulfil your request.

**1.7 If our business is sold:** We will transfer your personal data to a third party:

**1.7.1** in the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets (at all times in accordance with all applicable data protection laws); or

**1.7.2** if Gatehouse or substantially all its assets are acquired by a third party, in which case personal data held by Gatehouse about its customers will be one of the assets transferred to the purchaser, in each case, the legal basis on which we process your data in these circumstances is our legitimate interest to ensure our business can be continued by a purchaser. If you object to our use of personal data in this way, the relevant seller or buyer of our business may not be able to provide good and/or services to you.

## **2 CATEGORIES OF INFORMATION WE COLLECT FROM YOU**

**2.1** We will collect and process the following personal data about you.

**2.2 Information you give us:** This is information about you that you give us when corresponding with us by phone, e-mail or otherwise. This may include – but is not necessarily exclusive to - names, addresses, email addresses, telephone numbers and other information relevant to the nature of the work/service(s) you have contacted us about.

**2.3 Information we receive from other sources:** We are working closely with third parties (including, for example sub-contractors in technical and delivery services) from whom we may also receive information about you.

**2.5** We do **not** process any special categories of personal data, meaning personal data revealing:

**2.5.1** racial or ethnic origin;

**2.5.2** political opinions; religious or philosophical beliefs or trade union membership;

**2.5.3** genetic or biometric data that uniquely identifies you; or

**2.5.4** data concerning your health, sex life or sexual orientation.

**2.6** We do not collect data relating to criminal convictions or offences or related security measures.

## 3 CATEGORIES OF RECIPIENTS OF PERSONAL DATA

**3.1** The details in our Privacy Policy relating to third parties other than Gatehouse are for your information only. We are not responsible for the privacy policies or practices of third party recipients of your personal data. Where third parties are recipients of your personal data from us, please read any information those third parties provide you about how, why and the legal basis for, their processing of your personal data and make your own enquiries in respect of them.

**3.2** Your personal data may be shared by us with categories of recipients that include:

**3.2.1** Business partners, suppliers and sub-contractors for the performance of any contract we enter into with you.

**3.2.2** In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.

**3.2.3** If Gatehouse or substantially all its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.

**3.2.4** If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions and other agreements; or to protect the rights, property, or safety of Gatehouse, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## 4 COOKIES

**4.1** A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer. We only use (and store) non-essential cookies on your computer's browser or hard drive if you provide your consent.

**4.2** We use traffic log cookies to identify which pages of our website are being used. This helps us to 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 purposes.

**4.3** A cookie in no way gives us access to your computer or any information about you.

**4.4** You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

## 5 USES MADE OF THE INFORMATION

**5.1** We will combine the information you provide to us with information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

**5.1** We may on occasions use pictures of the work we have completed on our website and to adhere to our commitments with Checkatrade. We will respect your privacy and images will not contain any details of location.

## 6 WHERE WE STORE PERSONAL DATA

**6.1** All of our suppliers are based within the EEA.

**6.2** We do **not** store any payment transaction information.

**6.3** We have implemented measures designed to secure your personal information from accidental loss and from unauthorised access, use, alteration and disclosure. All information you provide to us is transmitted using TLS encryption, and is stored on our secure servers behind firewalls. We limit access to our servers to ensure that your information is not viewable by any unauthorised parties. Although we will do our best to protect your personal data, Gatehouse cannot guarantee the security of data transmitted via the internet/email. Any transmission is at your own risk.

## 7 PERIODS OF STORAGE

**7.1** Where you order goods and/or services from us, we will retain your data for a period of six (6) years after the goods were delivered and/or the services performed. This will ensure that we are able to assist you should you have any questions or feedback in relation to our goods and/or services or to protect or defend our legal rights.

**7.2** Where we have processed your personal data to provide you with marketing communications with consent, we may contact you at least every twelve (12) months to ensure you are happy to continue receiving such communications. If you tell us that you no longer wish to receive such communications, your personal data will be removed from our lists.

**7.3** Where we have processed your data for any other reason (such as where you have contacted us with a question in connection with our goods and/or services), subject to section 7.1, we will retain your data for a period of twelve (12) months

## 8 YOUR RIGHT TO OBJECT UNDER DATA PROTECTION LAWS

**8.1** You have the right to object to us processing your personal data where we are processing personal data:

**8.1.1** based on our legitimate interests (as set out at section 1 above). If you ask us to stop processing your personal data on this basis, we will stop processing your personal data unless we can demonstrate compelling grounds as to why the processing should continue in accordance with data protection laws; and

**8.1.2** for direct marketing purposes. If you ask us to stop processing your personal data on this basis, we will stop.

In each case please do so by contacting us directly (please see section 12).

## 9 YOUR OTHER RIGHTS UNDER DATA PROTECTION LAWS

### Right of access

**9.1** You have the right to receive confirmation as to whether your personal data is being processed by us, as well as various other information relating to our use of your personal data. You also have the right to access your personal data which we are processing. You can exercise this right by contacting us directly (please see section 12). After 25 May 2018 we will deal with Access Requests for free, however we are entitled under the Act to refuse to process your request, or to charge for a request to meet our costs in providing you with details of the information we hold about you, if we feel the request is manifestly unfounded or excessive.

### Right to rectification

**9.2** You have the right to require us to rectify any inaccurate personal data we hold about you.

**9.3** You also have the right to have incomplete personal data we hold about you completed, by providing a supplementary statement to us.

**9.4** If you request a correction of your personal information we will take reasonable steps to check its accuracy and correct it.

### Right to restriction

**9.5** You have the right to restrict our processing of your personal data where:

**9.5.1** the accuracy of the personal data is being contested by you;

**9.5.2** the processing by us of your personal data is unlawful, but you do not want the relevant personal data erased;

**9.5.3** we no longer need to process your personal data for the agreed purposes, but you want to preserve your personal data for the establishment, exercise or defence of legal claims; or

**9.5.4** we are processing your data on the basis of our legitimate interest (as set out at section 1 above) and you:

**9.5.4.1** object to our processing on the basis of our legitimate interest under section 8.1.1 above; and

**9.5.4.2** want processing of the relevant personal data to be restricted until it can be determined whether our legitimate interest overrides your legitimate interest.

**9.6** Where any exercise by you of your right to restriction determines that our processing of personal data is to be restricted, we will then only process the relevant personal data in accordance with your consent and, in addition, for storage purposes and for legal claims.

### Right to data portability

**9.7** You have the right to receive your personal data in structured, standard machine-readable format and the right to transmit such personal data to another controller.

## Right to erasure

**9.8** You have the right to require we erase your personal data which we are processing where one of the following grounds applies:

**9.8.1** the processing is no longer necessary in relation to the purposes for which your personal data was collected or otherwise processed;

**9.8.2** our processing of your personal data is based on your consent, you have subsequently withdrawn your consent and there is no other legal ground we can use to process your personal data;

**9.8.3** you object to the processing in your personal data as set out in section 8.1.1 above and we have no overriding legitimate interest for our processing;

**9.8.4** the personal data have been unlawfully processed; and

**9.8.5** the erasure is required for compliance with a law to which we are subject.

**9.9** On verification of your request for erasure, please note that we will endeavour to erase the relevant data as quickly as possible. We will try to comply with your request within one month.

**9.10** You have the right to lodge a complaint with the Information Commissioner's Office, the supervisory authority for data protection issues in England and Wales.

**9.11** Exercising your rights: You can exercise your rights by contacting us directly (please see section 12).

## 10 LINKS ON OUR WEBSITE

Our website may, from time to time, contain links to and from the websites of our partner networks and affiliates. Our service connects you to different websites. If you follow a link to any of these websites or use our service, please note that you have left our website and these websites have their own privacy policies. We do not accept any responsibility or liability for these policies or websites. Please check these policies before submitting any personal data to these websites.

## 11 CHANGES TO OUR PRIVACY POLICY

Any changes we make to our privacy policy in the future will be posted on our webpage and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

## 12 CONTACTS

Questions, comments and requests regarding this privacy policy are welcomed.

You can contact us by telephoning our Customer Services team on 01444 473396 or by writing to us at Privacy, Gatehouse Security Limited, 32 Lower Village, Haywards Heath, West Sussex RH16 4GS.

We can be contacted by email at [info@gatehousesecurity.co.uk](mailto:info@gatehousesecurity.co.uk)

This privacy policy was last updated on 24 May 2018