

**GROUP DATA PROTECTION POLICY**

This Data Protection Policy is approved by the Group Data Protection Officer.

**Scope**

This Data Protection Policy covers the Asset Protection Group Limited and all its operating subsidiaries (including but not limited to Cannon Fire Protection Limited, Cannon Fire Safety Limited, Cannon Fire Protection Services Ltd, Cannon Fire Sprinklers Contracts Ltd, UK Fire Safety Systems Limited, Everyday Driver Support Limited, Asset Protection Partners Ltd, Alarm Response & Keyholding Limited, ARM Secure Corporate Services Ltd and Video Receiving Centre Limited). Asset Protection Group, in the context of this Policy Statement shall be hereon defined as Asset Protection Group Limited and all its subsidiaries.

APG Data Protection and Privacy Policy is in line with the laws set out in the GDPR (General Data Protection Regulation) and covers the following areas in layman's terms:

- Introduction ..... 2
- Who are we? ..... 2
- Principles for processing personal data..... 2
- Why do we collect Personal Information ..... 3
- Whose personal data do we collect ..... 3
- How we collect your personal data ..... 3
- What Personal data do we collect..... 4
- Voice Communications..... 5
- Who will we share your personal data information with and why ..... 5
- Legal basis for collecting and processing personal data ..... 6
- How we store personal data and Retention of personal data ..... 6
- Data Protection rights ..... 7
- Complaints or queries ..... 8
- Contact details ..... 8



## Introduction

Protecting your privacy is important to Asset Protection Group.

We are committed to protecting your personal information whether by individuals with whom we do business, visitors to and users of our websites.

We shall always be transparent with you about how we are using your details and shall process your personal Data in full accordance of the General Data Protection Regulation (GDPR) and the UK Data Protection Act 2018.

This Policy Notice explains what personal Data we collect, how we use and manage it and the rights you have in relation to your personal Data.

Before you provide us with any personal Data or browse our website, please read through this policy Notice in full and make sure that you are comfortable with our privacy practices.

## Who are we?

Asset Protection Group Limited comprises of Fire Safety and Security businesses with shared ownership and one common goal, protecting People, Properties and Peace of Mind..

Our full contact details can be found at the end of this notice.

This privacy notice covers all information held by the organisation be it captured by electronic means, paper records, in person or via social media. This policy covers our main websites <https://www.assetprotectiongroup.co.uk> and our subsidiaries websites

## Principles for processing personal data

Our principles for processing personal data are:

- **Fairness and lawfulness**, when we process personal data, the individual rights of the data subjects must be protected. All personal data must be collected and processed in a legal and fair manner.
- **Restricted to a specific purpose**, the personal data of Data Subject must be processed only for specific purposes.
- **Transparency**, the Data Subject must be informed of how his/her data is being collected, processed and used.

## Why do we collect Personal Information

We collect personal data for a variety of reasons to offer our services to you and to comply with our legal duties, including for the purpose of fulfilling our contractual obligations for our customers, to notify you of any changes to your services and to provide you with information in relation to similar goods and services that may be of interest, to administer our websites and help improve our products and services.

The range of services that we provide includes but not limited to:

- System design
- Specification
- Installation & commission
- Servicing & maintenance
- Around the clock monitoring
- Keyholding
- Alarm Response
- Static Guards
- Vacant Property Inspections
- Marketing

## Whose personal data do we collect

Asset Protection Group collects personal data from a range of individuals in the context of its business activities, including but not limited to:

- Representatives of our suppliers, customers and other business contacts
- Contractors
- Users of our websites, social media
- Individuals who contact us by any means
- Job applicants
- Employees

## How we collect your personal data

We obtain personal data which is knowingly and voluntarily disclosed to us, both in an online and offline context. We collect personal data when you:

- Visit our websites, and/or complete one of our forms; contact our customer service centres or request information from us in any other way including but not limited to;
- Visit our or your premises
- Submit an order to us
- Communicate with us via phone, websites, social networking websites, third party apps or similar technologies
- Subscribe to our blog, newsletters, emails or visit one of our trade counters at an exhibition



## What Personal data do we collect

Given the diversity of Asset Protection Group of companies UK wide customer base, the personal data that we collect will vary. Some of our customers may have a contract with us for their own home. Other customers may take the form of a local authority, housing association, private business or consortium who contract us to attend a portfolio of sites to provide a range of services and some customers may operate on behalf of another client such as a Facilities Management Organisation, to which we operate as a Data Controller and Data Processor.

The information we collect in order to meet our contractual obligations will therefore include but not limited to the following (where appropriate):

- Name
- Job title
- Photographic identification
- Address
- Phone numbers
- Voice communications
- Email address
- Medical Declaration (in the case of employees)
- Next of Kin details (in the case of employees)
- Details of your business and other interests
- Communications with you including notes from meetings and phone conversations
- Financial and payment information
- IP address, Access codes and passwords to enable us to maintain your systems and verify identity

## Voice Communications

We record all telephone communications with time and date to and from our Alarm Receiving Centre to comply with our Regulators. Details of length of time the recording are kept can be found below.

- We keep the recorded telephone communication for 12 months.
- For any recorded communication relating to incidents to social alarms then they are kept for 12 months.
- Any voice communications to our ARC that are subject to an enquiry will be retained until the conclusion of the enquiry.

## Who will we share your personal data information with and why

One of the Asset Protection Group companies may share your personal Data with people within the company who have a “need to know” that data for business or legal reasons, for example but not limited to the examples below:

- Administrative functions such as processing an invoice, or to direct a query that you have submitted to the relevant department within one of the Asset Protection Group companies.
- Monitoring Centre to enable monitoring of your system and site.
- Engineers attending service, installation and call outs.
- Sales and Site surveyors

We may disclose your personal data to third parties including but not limited to:

- Authorities
- Insurers
- To respond to Legal request or comply with a Legal obligation
- Suppliers including but not limited to, IT Support Services
- External monitoring centre
- Sub-contractors and Service Partners
- Screening Agencies
- Insurers where a need for credit insurance is identified
- For purpose of seeking Legal or other professional advice

If you would like to know who we have shared your personal data with in detail, please contact us using the contact details provided at the end of this Privacy Notice.

## Legal basis for collecting and processing personal data

Asset Protection Group of companies' Legal basis for collecting and using personal data as described in this privacy notice (statement) depends on the personal data we collect and the specific context in which we collect the information.

We will process your data under Asset Protection Group legitimate interests, to comply with the Law, contractual obligations, employment legislation and, also where applicable, with your consent.

## How we store personal data and Retention of personal data

We store all personal data on our secure drives, any password, access codes, IT addresses are stored on a separate secure drive which limited to a certain number of "need to know" personal. Our Websites servers are hosted from within then EEA.

We will keep your information for no longer than is necessary in accordance with any statutory time limits and regulator best practice guidelines, but the following will give you an idea of how long we shall retain your information.

**Employee data:** 7 years after employee leaves. Pension data and certificates for medical tests, for example, eye or hearing tests, will be kept indefinitely.

**Recruitment information:** CV's and applications for unsuccessful candidates will be deleted 6 months after campaign, unless the candidate has consented to a longer retention period.

**Client information:** For as long as a working relationship is active and then 7 years following last activity.

**Enquiries:** 24 months, we retain for this period for any client that does not sign up as often enquiries can take this period of time to come to fruition. For existing clients please refer to client information.

**Financial information:** 7 years after last Activity

## Data Protection rights

Your rights are detailed below, and you have a right to ask us to stop processing or remove certain types of personal data, especially sensitive data. Where there is no overriding lawful reason why we need to do this, we shall always honour your request. Contact details can be found at the end of this Privacy Notice. The Data Protection Act 2018 and GDPR affords Data Subjects (that is people whose information we capture) certain rights and these are listed below for your convenience:

- You have the **right to access** a copy of the personal information we hold about you by making a Subject Access Request (DSAR), you can do this by phone, in writing or by email to Asset Protection Group, for attention of Data Protection Officer (Full contact details are provided at the end of this Privacy Notice) **We will have to verify your identity before we can proceed.**
- You have the **right of rectification** to amend or update your personal information and ensure we maintain accurate and up to date records and or data about you.
- You have the **right to delete** the information we have on you, also known as ‘the right to be forgotten’.  
The broad principle underpinning this right is to enable an individual to request the deletion or removal of personal data where there is no compelling reason for its continued processing by Asset Protection Group.
- You have the **right to restriction ‘block’ or suppress** the processing of your personal data. Processing of your personal information may be restricted in the event it is no longer essential to support the use of services provided to you and/or not part of any contractual, legal or financial requirement to do so. Asset Protection Group is permitted to store the personal data, but not further process it. Asset Protection Group may retain just enough information about you to ensure that any restriction is respected in future.
- You have the **right for data portability** which allows individuals to obtain and or reuse their personal data for their own purposes across different services. It allows you to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability.
- You have the **right to object** to the processing of your personal information based on consent, our legitimate interests or the performance of a task in the public interest or exercise of official authority, direct marketing.
- You have the right to ask us to stop sending you withdraw consent **direct mail or email.**

You can read more about your rights at <https://ico.org.uk/your-data-matters/>

## Complaints or queries

We try to meet the highest standards when collecting and using personal information.

For this reason, we take any complaints we receive about this seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

If you have a concern, enquiry or complaint about how Asset Protection Group has used your personal Data please use contact detail below. Please note: you will be asked to prove your identify before any personal information can be released.

## Contact details

Data Protection Officer  
Suite 2,  
720 Mandarin Court Centre Park,  
Warrington,  
England,  
WA1 1GG

Registration Number: 09621327  
ICO Registration Number: ZB287276  
Tel: 01925 737 545  
Email: [dataprotection@apguk.co.uk](mailto:dataprotection@apguk.co.uk)

Date: 25/07/2022

Review Date: 07/03/2023

