

DATA PROTECTION POLICY.

1. Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (the "GDPR").

2. Who are we?

Vanguard (Bournemouth) Ltd is the data controller. This means it decides how your personal data is processed and for what purposes. Vanguard (Bournemouth) Ltd is a company limited by guarantee incorporated and registered in England and Wales with company number 7790618 and our registered office is Top Floor, 39 Poole Hill, Bournemouth, Dorset, BH2 5PW. We are a registered with ICO and our registration number is: ZA047230

3. How do we process your personal data?

Vanguard (Bournemouth) Ltd complies with its obligations under the "GDPR" by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data. Minimal personal data (contact information Only) is kept on mobile devices and these are password protected.

We use your personal data for the following purposes:

- To manage our employees
- To maintain our own accounts and records
- To inform you of news, events, activities and services, and to survey your views on matters relevant to the security industry
- To fulfil specific requirements of service delivery contracts with government agencies, local government,
- To operate commercially in trading;

4. What is the legal basis for processing your personal data?

- Processing is necessary for carrying out obligations under employment, health and safety, social security or social protection law, or a collective agreement.
- Processing is necessary under BS7858:2012 and the SIA ACS standards.

5. Sharing your personal data

Your personal data will be treated as strictly confidential and will not be shared except where specifically required by contractual agreements. We will only share your data with third parties in such cases where partnership working agreements require data sharing, specific consent will be obtained.

6. How long do we keep your personal data?

We keep data in accordance with the GDPR, and management team has decided that in relation to application data (i.e. consent data), the appropriate duration for data retention should be 2 years for people who we do not employ, 7 years from the end of employment for employees and self employed contractors.

Such personal data is time stamped, and we have systems in place to ensure that personal data is not retained indefinitely without the relevant consent or another relevant legal basis for processing.

7. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of your personal data which Vanguard (Bournemouth) Ltd holds about you;
- The right to request that Vanguard (Bournemouth) Ltd corrects any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for the Vanguard (Bournemouth) Ltd to retain such data;
- The right to withdraw your consent to the processing at any time;
- The right to request that the data controller provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability)¹.
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data
- The right to lodge a complaint with the Information Commissioners Office.

8. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will publish a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

Contact Details

To exercise all relevant rights, queries of complaints please in the first instance contact the Compliance Officer, Vanguard (Bournemouth) Ltd

You can contact the Information Commissioners Office on 0303 123 1113 or **via email** or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.