

Updated 18 May 2018

O'Brien Security Systems is committed to protecting your personal information and respecting your privacy and rights when it comes to information processing. O'Brien Security Systems is committed to maintaining compliance with current data protection legislation, any future legislation that comes into force as and when required, and to maintain transparency about how it processes personal data. O'Brien Security Systems processes the personal data of both its own employees and its business contacts, and works to robust information security policies to ensure this data is kept secure and the risk of data breach is reduced to a minimum. O'Brien Security Systems is regularly audited by NSI, (the leading Certification Body for the security and fire protection industries in the UK and Eire, and provides certification and auditing services to companies within these sectors), to ensure that it consistently meets industry standards.

This Privacy Notice informs you how and why O'Brien Security Systems collects your personal information, how O'Brien Security Systems processes your personal information, who has access to your personal information, and details your rights as an individual to control how your personal information is processed.

By continuing to use O'Brien Security Systems, you give O'BRIEN SECURITY SYSTEMS permission to process your personal data for the purposes identified as set out within this Privacy Notice.

This Privacy Notice contains information regarding:

- **LAWFUL BASIS FOR PROCESSING YOUR INFORMATION**
- **COLLECTION OF PERSONAL INFORMATION**
- **HOW O'BRIEN SECURITY SYSTEMS USES YOUR INFORMATION**
- **VISITORS TO THE O'BRIEN SECURITY SYSTEMS WEBSITE**
- **PEOPLE WHO CONTACT O'BRIEN SECURITY SYSTEMS VIA SOCIAL MEDIA**
- **ENQUIRIES**
- **O'BRIEN SECURITY SYSTEMS APPROVED AND APPLICANT COMPANIES**
- **COMMUNICATIONS**
- **PEOPLE WHO USE O'BRIEN SECURITY SYSTEMS SERVICES**
- **RECRUITMENT, STAFF DETAILS AND SECURITY SCREENING**
- **BOARD, SUBCONTRACTORS AND COMMITTEE MEMBERS**
- **CCTV**
- **COMPLAINTS**
- **YOUR RIGHTS**
- **SUBJECT ACCESS REQUESTS**
- **CHANGES TO THIS PRIVACY NOTICE**
- **HOW TO CONTACT US**
- **DISCLAIMER**
- **LINKS TO OTHER WEBSITES**

To comply with the data protection requirements of the General Data Protection Regulation (GDPR), there must be a lawful basis to collect, process and store any O'Brien Security Systems as a data controller, the lawful bases under which personal data is processed include:

1. The contractual agreement with each approved company for the provision of audit services. Personal information that O'Brien Security Systems collects during the application and approval processes will be limited to what is necessary and processed for the purposes of fulfilling its contractual obligations. See the 'O'Brien Security Systems approved and applicant companies' section below.
2. Where the processing is necessary for the purposes of legitimate interests pursued by O'Brien Security Systems or by yourselves as a third party. For example, O'Brien Security Systems may occasionally send out communications using your contact details that are of specific importance to approved companies, or may ask for your input when developing a new service. See the 'Communications' section below. (Where such interests are overridden by your interests or fundamental rights and freedoms, O'Brien Security Systems will instead ask for your consent.)
3. Any active consent you may have given O'Brien Security Systems to receive or access particular services where another lawful basis does not apply. You will be asked to demonstrate your consent with an affirmative action, such as ticking a box or filling in your email address.

When you access and browse the O'Brien Security Systems website and when you correspond with O'Brien Security Systems by phone, post or email, you may give O'Brien Security Systems information about yourself. This information can include your name, postal address, email address, landline and/or mobile telephone number and information about your employment (including your job title, responsibilities and employer's details) as well as other personal information.

This Privacy Notice applies, but is not limited to, personal information that O'Brien Security Systems collects from:

- visitors to the O'Brien Security Systems website;
- applicant companies wishing to obtain O'Brien Security Systems approval;
- approved companies maintaining their O'Brien Security Systems approval;
- associated third party organisations, stakeholders, suppliers and subcontractors;
- complainants and other individuals in relation to a complaint or enquiry;
- individuals who use O'Brien Security Systems services (e.g. Standards on Subscription);
- external committee members;
- job applicants and O'Brien Security Systems current and former employees;
- visitors to the O'Brien Security Systems Head Office (including passersby).

Where O'Brien Security Systems collects personal data (for example your name, postal address or e-mail address) this information is used exclusively by O'Brien Security Systems for providing the services you have requested or which are detailed within your service contract. O'Brien Security Systems will only pass your personal data to relevant third party organisations or individuals either as a contractual requirement, with your explicit consent, or if specifically compelled to do so by law or court order or other legitimate reason.

Unfortunately, the transmission of information via the internet is not completely secure. Although O'Brien Security Systems does its best to protect your personal data, it cannot guarantee the security of your data transmitted to the O'Brien Security Systems site; any transmission is at your own risk. Once O'Brien Security Systems has received your information, robust information security measures in place protect it and minimise the risk of unauthorised access.

Public Website Areas

You can visit the O'Brien Security Systems website without revealing who you are or giving any information about yourself, except where you voluntarily choose to give O'Brien Security Systems your personal details via e-mail or by enquiring about any of O'Brien Security System's services.

Website Forms

In order to access certain services on the O'Brien Security Systems website you may be required to fill in a web form which includes completing your personal details. When you submit a web form, this information is sent directly to O'Brien Security Systems only, and is then processed as appropriate.

People who email O'Brien Security Systems

O'Brien Security Systems may monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

You can contact O'Brien Security Systems via Facebook or by direct message if you wish to enquire or comment on our services. These communications are managed by O'Brien Security Systems Marketing department and are only ever shared internally at O'Brien Security Systems, for the purpose of providing you with the information you have requested. Should O'Brien Security Systems wish to quote your comment with your name and / or company within O'Brien Security marketing literature or on the O'Brien Security Systems website, you will be first contacted by the O'Brien Security Systems Marketing department to ask for your explicit consent to do so.

O'Brien Security Systems receives enquiries about our services through the website and by telephone, post and email. Enquiries will typically require the person to enter some form of contact details to allow O'Brien Security Systems to follow them up.

For general enquiries, a record of the enquiry is retained by O'Brien Security Systems until the enquiry has been dealt with and no further follow up is needed.

If an individual or Company makes an application enquiry or receives a quotation, but does not wish to progress the application at that time, the details are held on O'Brien Security Systems internal system for 24 months. This is because O'Brien Security Systems is often contacted by individuals that are in the process of building or renovating their property, and are a long way off being ready for work to be carried out. Quotation figures remain valid for a minimum period of 6 months, as it enables these customers to renew their interest in pursuing a quotation.

On termination of the contract with O'Brien Security Systems we retain personal customer information in accordance with the Limitation Act 1980. We also must legally retain details of all financial transactions for 6 years from the end of the last financial year they relate to, (or longer if they show a transaction that covers more than one of the Company's accounting periods).

All information provided to O'Brien Security Systems is treated as Confidential. This information is stored securely on O'Brien Security Systems internal database and is only used for purposes related to the administering of services requested. Any financial details given by the customer have access limited to the relevant personnel at O'Brien Security Systems.

All information collected throughout the annual audit of O'Brien Security Systems by the National Security Inspectorate (NSI) are also treated as Confidential and is stored securely on NSI's internal CRM database. Evidence collected during audits may contain samples of personnel files, which could in turn contain personal data. NSI collects this information as evidence for the audit process in order to deliver its Certification Body services, and will only ever take a record of personal data where necessary for the purpose of continuing industry approval.

O'Brien Security Systems may also share information with the Police if there is a lawful basis for doing so, with the United Kingdom Accreditation Service (UKAS) or an Alarm Receiving Centre (should the premises be monitored).

Employment of Staff

Applicants for roles at O'Brien Security Systems are asked to complete a Job Application, and provide either a reference or detailed CV. This information is used solely by O'Brien Security Systems management for the purpose of assessing the applicant's suitability for the role, leading to a possible invitation to interview.

Personal details of unsuccessful applicants are held by the O'Brien Security Systems HR Manager for a period of 6 months after the decision, for the legitimate interest of assessing eligibility for any other roles that may be more suitable. O'Brien Security Systems does not share this information with any other party within this time. Applicants do have the right to contact the HR Manager and withdraw their details at any time during the recruitment process, and the HR Manager will then update the records accordingly.

O'Brien Security Systems requires successful applicants to provide proof of identity, such as a passport or a birth certificate, to ensure the applicant is eligible to work in the UK, which is a legal requirement. O'Brien Security Systems also requires the applicant's full name, contact details, home address, bank details and name and contact details of their next of kin. O'Brien Security Systems may also ask about any medical conditions, details of which remain strictly private and confidential for the attention of the HR Manager only. O'Brien Security Systems collects personal data from the Job application form for the purpose of setting up the employee on the payroll system, the pension scheme and to facilitate the security screening background checks. O'Brien Security Systems will only share the employee's details with the third parties providing these services to allow the service provision.

The contract of employment forms O'Brien Security Systems with the lawful basis to process employees' personal data in order to fulfil its contractual obligations, plus any specific consent given by the employee for additional services or benefits. Information disclosed remains strictly private and confidential and under the control of the O'Brien Security Systems HR Manager, and only accessible by the CEO and HR Manager. Should an employee wish to enquire about the personal information O'Brien Security Systems holds about them, they can make a 'subject access request' to the HR Manager.

Successful applicants to O'Brien Security Systems are required to complete a security screening check before commencing employment with O'Brien Security Systems. This process is conducted by the HR Manager who collects personal data for the purpose of carrying out background screening on behalf of its employees. Successful applicants are asked to complete a security screening application form provided by the O'Brien Security Systems HR Manager. Applicants are asked to provide their current passport or a birth certificate, a driving license and a utility bill or bank statement with their current home address stated. These forms are checked and counter signed by the O'Brien Security Systems HR Manager. The HR manager will ask the applicant about their previous work experience, education, referee details, and for answers to the questions relevant to the role they have applied for. The HR Manager will share the applicant's name, date of birth and address history with third parties (the Criminal Disclosure and Barring Service and Equifax) where it is necessary to fulfil their contractual obligations to the applicant and to O'Brien Security Systems, and where obliged to do so by law.

Once the preliminary screening is successful, the applicant can then commence their employment with O'Brien Security Systems. The O'Brien Security Systems HR Manager compiles a separate file relating to their employment containing the documentation listed above. Please note this file is kept separately to the employee's HR file. The information contained in this is kept in a secure location and is only used for purposes directly relevant to that person's employment.

If the employment is terminated or an employee resigns, O'Brien Security Systems retains both the security screening and HR file for each individual file for 7 years before destruction. O'Brien Security Systems will inform any third parties processing the data to remove it subject to data protection requirements.

O'Brien Security Systems Board members, subcontracted auditors and members of O'Brien Security Systems committees are subject to the same screening process as O'Brien Security Systems employees. Each individual is asked to sign a contractual agreement and complete the required documentation before they commence their relationship with O'Brien Security Systems. Personal data requested

will be limited to what is appropriate for the role and kept Confidential at all times. Records are kept by O'Brien Security Systems for 7 years after cessation of the contract with O'Brien Security Systems.

O'Brien Security Systems has detector-activated CCTV cameras installed around the Head Office in Swansea for the purposes of crime prevention and public safety. O'Brien Security Systems staff, visitors to O'Brien Security Systems or passersby may be recorded on these cameras. The footage is stored by O'Brien Security Systems for a limited time before it is overwritten. O'Brien Security Systems may monitor the footage in the event of a security breach. O'Brien Security Systems will only ever share the footage with the local Police force in the event of a criminal investigation. The contact number for CCTV enquiries is stated on signage around the building.

Visitors to O'Brien Security Systems are asked to sign in using the Visitors Book in the Reception area. Information requested includes name, company and vehicle registration. In the unlikely event of a fire, this information is used to perform a roll call and ensure all visitors have evacuated the building. The O'Brien Security Systems car park is private property and is available for use by O'Brien Security Systems staff and visitors only, and by providing your registration number, O'Brien Security Systems is able to identify your vehicle. This information remains at O'Brien Security Systems Head Office and is not shared with any other party.

O'Brien Security Systems occasionally receives complaints. A complaint to O'Brien Security Systems can be lodged by letter by telephone or email.

Details about complaints made and the parties involved are stored securely. It may be necessary to share the contact details of the complainant with the parties involved or with other relevant bodies in order to progress the complaint. O'Brien Security Systems will gain authorisation from the complainant before passing any confidential information or personal data to other parties.

O'Brien Security Systems takes any complaints received about collection and use of personal data very seriously and encourages people to bring to its attention any collection or use of information they think is unfair, misleading or inappropriate.

Complaint details are retained for 7 years before destruction in case of any further proceedings.

Under the General Data Protection Regulation (GDPR) and the Data Protection Act 1998 (DPA), O'Brien Security Systems recognises and respects that you have rights as an individual providing personal data:

- You have the right to know exactly how your personal data will be processed by O'Brien Security Systems. O'Brien Security Systems commits to processing your data fairly, lawfully and transparently, details of which are set out in this Privacy Notice.
- You have the right to request access to the personal data that O'Brien Security Systems holds about you.
- You have the right to request changes to the data held about you if the data is incorrect or requires additional information.
- You have the right to request erasure of your data or the right to be forgotten completely, where there is no legitimate reason for your data to continue to be processed.
- You have the right to request that processing of your data is restricted so that the data remains stored but is not further processed by O'Brien Security Systems.
- You have the right to request a copy of your data in a portable format.
- You have the right to object to your data being processed, if the processing is for a legitimate interest without compelling grounds, or for direct marketing.

You may notify O'Brien Security Systems of any request to change how your personal data is processed or to update your records by telephone, email or post (- see 'How to Contact Us').

O'Brien Security Systems retains the right to continue processing personal data if there are compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the individual, or the processing is for the establishment, exercise or defense of legal claims.

Please note: should you choose to erase your data or restrict how your data is processed, this may affect your ongoing service provision, or impact upon the sharing of important information and updates.

If you wish to make a free Subject Access Request to access a copy of the personal data O'Brien Security Systems stores about you, or understand how it is processed and why, please follow the instructions below:

1. Contact your O'Brien Security Systems Head Office contact (email preferred).
2. Include details of your request – which information about you do you wish to have access to?
3. Provide sufficient evidence about yourself for O'Brien Security Systems to verify your identity. (O'Brien Security Systems may have to contact you otherwise.)

O'Brien Security Systems will deal with your request without undue delay, within 1 month of the receipt of your request. O'Brien Security Systems will notify you if it is unable to provide the information within 1 month, detailing the likely timescale. If O'Brien Security Systems is unable to grant you access to your data for a specific reason you will be notified immediately. In certain circumstances, such as where a large amount of data is requested which may require extensive time or resource to gather and collate the data, O'Brien Security Systems reserves the right to charge a fee to account for this activity.

This Privacy Notice is regularly reviewed and may change from time to time.

How to contact us

If you wish to contact O'Brien Security Systems for further information about this Privacy Notice, you can call us, email us or write to us at:

O'Brien Security Systems
46 Lon Mafon,
Tycoch,
Swansea
SA2 9ER

E: info@obriensecuritysystems.co.uk

T: 01792 299992

This Privacy Notice does not provide exhaustive detail of all aspects of O'Brien Security Systems collection and use of personal information. However, O'Brien Security Systems is happy to provide any additional information or explanation needed when requested. O'Brien Security Systems makes every effort to ensure that the information provided on its website is accurate and current. However, it cannot guarantee this and cannot accept responsibility for any errors, omissions, misstatements or mistakes on the website. Anyone becoming aware of such matters is requested to notify O'Brien Security Systems in writing or by e-mail.