



POL/17

Integrated Management System

Last Review: 12<sup>th</sup> May 26

Next review: 12<sup>th</sup> May 27

## GDPR Privacy Policy

### Summary

H&M Security Services Ltd is committed to protecting all personal data that we collect and handling it responsibly.

This covers the personal data that H&M Security collects from employees or people applying for work with us, and clients and potential clients who we interact with, including sales and marketing information that we may obtain from third parties.

The following sections below explain in more detail:

- The types of personal data we collect from you.
- The types of personal data we receive from third parties
- Why we process your personal data
- Who we share your personal data with
- Personal data transfers outside of the EEA
- How long we retain your personal data
- Your rights to withdraw your consent and to object (including withdrawing from direct marketing)
- Your personal data rights
- How to contact us and exercise your rights

For details concerning how we collect information about the use of our website, you can read our Cookies Policy.

### **1. Personal data H&M Security collects, from employees/people applying for work, and Clients/potential clients.**

#### Employees/people applying for work

When you apply for work with H&M Security you will be required to complete an application pack. This contains all the personal information we require to confirm your employment and complete the appropriate level of vetting required by the Security Industry Authority. It also contains information that we will be expected to provide to our clients on whose sites you will be working. This will include:

- Your name and contact details
- Five-year work history
- Passport, Visa, birth certificate
- SIA Licence and other training Certificates
- Proof of address
- Drivers Licence
- Bank Details
- HM Revenue & Customs Information
- Medical Form
- ID & Photograph



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### Clients and potential clients

In order that we can deliver services to our clients we will need to collect personal information from client representatives who we may have to contact regarding security related incidents and service delivery. These will normally be restricted to:

- Your name and contact details.
- Contract details

We will also collect data for potential contacts working for companies or on projects who we anticipate may require security services at a later date. This will be restricted to:

- Your name and contact details
- Who you work for and projects you are linked to

## **2. Personal Data H&M Security receives from third parties**

Sometimes we receive personal data from third parties, in particular commercial partners providing information on construction-based projects and/or security tendering opportunities. A full list of our current partners is available on request.

### Referrals from current clients and contacts.

In relation to personal data provided by third parties we will apply the same level of protection to this data as any other and provide people with the right to withdraw their consent and have data removed.

## **3. Why H&M Security processes your personal data**

This section explains the reasons why we process your personal data and our legal base for doing so.

### Legitimate interests

We process your personal data when necessary to pursue our legitimate interests in the following:

- Employing staff and processing job applications.
- Confirming training qualifications and personal details to select suitable staff for sites and provide details to clients.
- Monitoring medical conditions that may impact on your work and informing clients if any condition represents a risk that needs to be managed.
- Ensuring compliance with our regulatory bodies, i.e. SIA.
- Managing legal claims, and investigative matters.
- Recording hours of work and payments.
- Using incident reports CCTV footage to protect the security of our clients and their staff, prevent unlawful activity.

You have a right to object to any processing that we undertake for our legitimate interests.



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### Consent

If you have opted-in to receive information or allow your information to be used by any of our commercial partners (for example by ticking a box on a tendering website) then we can provide you with the information of the source on request, or we can provide a list of our current Commercial Partners.

We also rely on consent to process information obtained from you through our website or social media sites.

Wherever we rely on your consent to process personal data, you have the right to withdraw that consent.

### Contract

We process your personal data when necessary for contractual reasons, such as administering your account, and to provide products and services that you have requested.

### Legal obligation

We are legally required to process your personal data in cases where we need to:

- Respond to certain requests by government or law enforcement authorities.
- Comply with local police, or Health and Safety investigations to collect CCTV footage of particular incidents.

## **4. Who we share personal data with**

We may share some of your personal data with the following recipients:

- Accountancy company employed by H&M Security to process officers pay.
- Clients requiring personal details to confirm qualifications or criteria required to work on site is met.

## **5. Personal data transfers outside of the EEA**

The EEA includes all EU countries, as well as Iceland, Liechtenstein and Norway. Currently none of the third parties that we share personal data with transfer personal data outside of the EEA. However, if your personal data is ever transferred to a country outside of the EEA and that country is not subject to an EU adequacy decision, we will ensure your data is protected by appropriate safeguards (for example, EU approved standard contractual clauses, a Privacy Shield Certification, or a Suppliers Corporate Rules). In this instance, a copy of the relevant safeguard can be provided for your review on request.

## **6. How Long H&M Security retains personal data**

### Employees/people applying for work

We retain personal data on employees for as long as you remain employed by H&M Security Services and then archived on file for a further seven years following the date you leave our employment.

Application packs for people who were not successful in their interview will be retained for one month and then removed. CV's from applicants seeking work will be cleared from our systems after six months.

Any information we hold that may give rise to potential legal disputes, i.e. accident and incident reports, will be retained for seven years.



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### Clients and potential clients

We retain personal data relating to clients for as long as your contract remains open, and for seven years after the end of the contract to ensure we have sufficient details to respond to any claims that may arise from that work.

Our contact details for potential clients are reviewed annually and anyone we hold personal data for given an opportunity to exercise your right to withdraw consent. Where we are asked not to send direct marketing, we keep a record of that fact and ensure that we respect your request in the future.

### Where we store your personal data

H&M Security may process and store personal data you provide to us on our internal and external third party hosted databases for the purpose of H&M Security maintaining a record of data protection impact assessments and processing records as required under GDPR. All the personal data you provide to us is stored on systems with technical and organizational security measures and controls. We will only store data for as long as is necessary for H&M security to process such personal data for the purposes set out in this privacy statement, to enable H&M Security to keep a record of data protection impact assessments and in accordance with H&M Security's internal retention policies and procedures.

If the personal information you provide to us becomes inaccurate or out of date you should inform us as soon as possible and we will update it. We will also review all personal information on current staff annually.

## **7. Your right to withdraw consent and object**

Wherever we rely on your consent to process personal data, you always have a right to withdraw that consent. You also have the right to object to any use of your personal data for direct marketing purposes, as well as to processing that we undertake on data we hold based on our legitimate interests.

## **8. Your other personal data rights**

In addition to your rights to withdraw your consent and to object, you have the right to ask us:

- For access to information about your personal data or for a copy of your personal data
- To correct or delete your personal data
- To restrict (i.e. stop any active) processing of your personal data
- To provide you with certain personal data in a structured, machine-readable format and to transmit that data to another organization.

These rights may not always apply, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law to keep or have a compelling legitimate interest in keeping. If this is the case, then we will let you know when we respond to your request.

## **9. How to contact us and exercise your rights**

The easiest way to stop receiving information from us is opting out of communications through the [info@hmsecurityservices.co.uk](mailto:info@hmsecurityservices.co.uk) e-mail or through the online preference on our website.

We will assist with any queries you have about your personal data. You can contact our Data Protection Officer at any time using the contact details below:



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Attention of Data Protection Officer  
H&M Security Services Ltd  
Connaught House  
Broomhill Road  
Woodford Green  
Essex, IG8 0XR

When you do so, please provide your full name, your preferred contact information, and a summary of your query.

If you have unresolved concerns, you also have the right to complain to the data protection authority where you live, work or where you believe a breach may have occurred. This is likely to be at the Information Commissioners' Office in the UK.

The ultimate responsibility for this policy lies with the Managing Director who ensures that it is given and retains the highest of priorities. This policy and its implementation will be reviewed at least annually and updated as required.

Signed by:

A handwritten signature in cursive script, appearing to read 'Ian Henderson', written over a horizontal dotted line.

**Ian Henderson**  
**Managing Director**  
**H & M Security Services Ltd**