

PRIVACY NOTICE

In accordance with the General Data Protection Regulation (GDPR), we have implemented this privacy notice to inform you, of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

This notice applies to current and former clients

A) DATA PROTECTION PRINCIPLES

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing is fair, lawful and transparent
- b) data is collected for specific, explicit, and legitimate purposes
- c) data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- d) data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- e) data is not kept for longer than is necessary for its given purpose
- f) data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- g) we comply with the relevant GDPR procedures for international transferring of personal data

B) TYPES OF DATA HELD

We keep several categories of personal data on our clients in order to carry out effective and efficient processes. We keep this data in clients file relating to each Client and we also hold the data within our computer systems, for example, our invoicing system.

Specifically, we hold the following types of data:

- a) Personal details such as name, company address, emails, phone numbers
- b) Bank account details
- c) VAT registrations
- d) Purchase order numbers
- e) Vender number
- f) Site keys
- g) Security access codes
- h) Emergency contacts
- i) Job title
- j) CCTV footage

C) COLLECTING YOUR DATA

You provide several pieces of data to us directly upon the start of our contract.

In some cases, we will collect data about you from third parties, such as yellow page, yell.com, etc.

Personal data is kept in files or within the Company's Finance Department and IT systems.

D) LAWFUL BASIS FOR PROCESSING

The law on data protection allows us to process your data for certain reasons only. In the main, we process your data in order to comply with a legal requirement or in order to effectively manage the terms and condition of contract we have with you.

The information below categorises the types of data processing we undertake and the lawful basis we rely on.

| Activity requiring your data | Lawful basis |
|--|-----------------------------|
| Carry out the contract that you have entered into with us e.g. using your name, contact details | Performance of the contract |
| Set up your account | Performance of the contract |
| Carry out the delivery of the services you have on your account | Performance of the contract |
| Ensuring payments are made under your account | Performance of the contract |
| Ensuring VAT and insurance premium tax is paid | Legal obligation |
| Carrying out checks in relation to your company status and validating the information supplied to us | Legal obligation |
| Making financial decisions in relation to entering both initial and subsequent contracts | Our legitimate interests |
| Making decisions about service delivery methods | Our legitimate interests |
| Ensuring efficient administration of contractual services to you | Our legitimate interests |
| Effectively monitoring the service provided including adherence to commitments and service entitlements | Our legitimate interests |
| Maintaining up to date records about you to ensure, amongst other things, effective correspondence can be achieved and appropriate contact points in place | Our legitimate interests |
| Ensuring we receive payment | Performance of the contract |
| Dealing with legal claims made against us | Our legitimate interests |
| Preventing fraud | Our legitimate interests |
| Ensuring our administrative and IT systems are secure and robust against unauthorised access | Our legitimate interests |

E) FAILURE TO PROVIDE DATA

Your failure to provide us with data may mean that we are unable to fulfil our requirements for entering into a contract with you or performing the contract that we have entered into.

F) CRIMINAL CONVICTION DATA

We will only collect criminal conviction data where it is appropriate given the nature of the services we provide you and where the law permits us. This data will usually be collected during contract negotiation, however, may also be collected during our engagement. We rely on the lawful basis performance of the contract, legal obligation or our legitimate interests to process this data.

G) WHO WE SHARE YOUR DATA WITH

Employees within our company who have responsibility for finance, accounts, administration of payment and contractual benefits and the carrying out performance related procedures will have access to your data which is relevant to their function. All employees with such responsibility have been trained in ensuring data is processing in line with GDPR.

Data is shared with third parties for the following reasons:

- Deliveries

- Payments
- Invoices
- Client's queries
- Providing cleaning services
- Cleaners on site

We may also share your data with third parties as part of a Company sale or restructure, or for other reasons to comply with a legal obligation upon us. We have a data processing agreement in place with such third parties to ensure data is not compromised. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

We do not share your data with bodies outside of the European Economic Area.

H) PROTECTING YOUR DATA

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

I) RETENTION PERIODS

We only keep your data for as long as we need it for, which will be at least for the duration of your service contract plus 7 years from the date that service contract with us terminates, although in some cases we will keep your data for a longer period after your contract has ended. Some data retention periods are set by the law. Retention periods can vary depending on why we need your data, as set out below:

| Record | Recommended Retention Period |
|------------------------|---|
| HMRC approvals | Permanently |
| Money purchase details | 6 years after transfer or value taken |
| Health data | 30 or 50 years |
| Litigation cases | 7 years from the conclusion of the litigation case |
| All other data | 7 years from the date the service contract with us terminates |

J) AUTOMATED DECISION MAKING

Automated decision making means making decision about you using no human involvement e.g. using computerised filtering equipment. No decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

K) CLIENT RIGHTS

You have the following rights in relation to the personal data we hold on you:

- a. the right to be informed about the data we hold on you and what we do with it;
- b. the right of access to the data we hold on you. More information on this can be found in the section headed "Access to Data" below and in our separate policy on Subject Access Requests";
- c. the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as 'rectification';
- d. the right to have data deleted in certain circumstances. This is also known as 'erasure';
- e. the right to restrict the processing of the data;
- f. the right to transfer the data we hold on you to another party. This is also known as 'portability';
- g. the right to object to the inclusion of any information;

h. the right to regulate any automated decision-making and profiling of personal data.

L) CONSENT

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data.

M) MAKING A COMPLAINT

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.

N) DATA PROTECTION COMPLIANCE

Our appointed compliance officer in respect of our data protection activities is:

Zeinab Ibrahim
020 8964 1001