Securitatem Group Ltd

PRIVACY AND COOKIE POLICY

1. Introduction

1.1 This is a Securitatem Group policy and as such covers all companies affiliated with the Group – namely Securitatem Consultancy Ltd and Securitatem Installations Ltd. All employees, workers and contractors of the Companies will adhere to and operate within the bounds of this policy.

1.2 The Securitatem Group understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1.3 Please read this Privacy and Cookie policy carefully and ensure that you understand it. Your acceptance of this policy is requested. By continuing to use this site you are agreeing to accept this policy and our use of 'cookies.

2. Definitions and Interpretation

2.1 In this policy the following terms shall have the following meanings:

- **Account** - means an account required to access and/or use certain areas and features of our Site;
- **Cookie** - means a small text file placed on your computer or device by our site when you visit certain parts of our site and/or when you use certain features of our site. Details of the 'cookies used by our site are set out in Part 14, below; and
- **Cookie Law** - means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003.

3. Information About Us

3.1 Our Site is owned and operated by Securitatem Group a limited company registered in England under company number 11805679.

Registered address: Unit 5 Roebuck Business Park, Ashford Road, Harrietsham, Kent ME17 1AB

Data Protection Officer: Nanette Moulton

Email address: headoffice@securitatemgroup.com

Telephone number: 020 3746 2214

Postal address: Unit 5 Roebuck Business Park, Ashford Road, Harrietsham, Kent ME17 1AB

3.2 We are regulated by the Information Commissioner's Office (ICO).

4. What Does This Policy Cover?

4.1 This Privacy and Cookie policy applies only to your use of our site. Our site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

5. What Is Personal Data?

5.1 Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the GDPR) and the Data Protection Act 2018 (collectively, the Data Protection Legislation) as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

5.2 Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

6. What Are My Rights?

6.1 Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 15.
- The right to access the personal data we hold about you. Part 13 will tell you how to do this.
- The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 15 to find out more.
- The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 15 to find out more.
- The right to restrict (i.e. prevent) the processing of your personal data.
- The right to object to us using your personal data for a particular purpose or purposes.
- The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

6.2 For more information about our use of your personal data or exercising your rights as

outlined above, please contact us using the details provided in Section 16.

6.3 It is important that your personal data is kept accurate and up to date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

6.4 Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

6.5 If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

6.6 We would welcome the opportunity to resolve your concerns ourselves, so please contact us first, using the details in Section 16.

7. What Data Do You Collect and How?

7.1 Depending upon your use of our site, we may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. Please also see Section 15 for more information about our use of 'cookies and similar technologies. We do not collect any 'special category' or 'sensitive' personal data or personal data relating to children or data relating to criminal convictions and/or offences.

Data Collected	How we Collect the Data
Identity Information including name and title	Via the Survey Request form and Contact Us form
Contact information including, address, email address and telephone number	Via the Survey Request form and Contact Us form
Technical information including e.g. IP address	This is automatically traced during the use of our website via statistic software

8. How Do You Use My Personal Data?

8.1 Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we may use your personal data, and our lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Basis
Registering you on our site	Identity Information including name and title Contact information including collected, address, email address and telephone number	To provide requested information or newsletter subscription via the Survey Request form and Contact Us form
Providing and managing your access to our site	No personal data is required	No personal data is collected

Administering business	Identity Information including name and title Contact information including collected, address, email address and telephone number	To provide requested information or newsletter subscription via the Survey Request form and Contact Us form
Supplying our services to you	Identity Information including name and title Contact information including collected, address, email address and telephone number	To provide requested information or newsletter subscription via the Survey Request form and Contact Us form
Communicating with you	Identity Information including name and title Contact information including collected, address, email address and telephone number	To provide requested information or newsletter subscription via the Survey Request form and Contact Us form
Supplying you with information by email and or post that you have opted-in-to you may opt-out at any time by writing to us	Identity Information including name and title Contact information including collected, address, email address and telephone number	To provide requested information or newsletter subscription via the Survey Request form and Contact Us form

8.2 With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, telephone or post with information, news, and offers on services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. If you have given us your details via the Request a Survey form or Contact Us form and no longer require our services, please contact us using the details in Part 15 to advise us you wish to opt out of any further communication.

8.3 We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

8.4 We use the following automated systems for carrying out certain kinds of profiling. If at any point you wish to query any action that we take on the basis of this or wish to request 'human intervention' (i.e. have someone review the action themselves, rather than relying only on the automated method), the Data Protection Legislation gives you the right to do so. Please contact us to find out more using the details in Section 16.

8.5 The following automated profiling may take place: Google analytics which allows site data tracking and statistics software that gives us vital insights on how visitors find our site, what they do when they get there, and other important information on the health of our business.

8.6 We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do

use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Section 16.

8.7 If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

8.8 In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

9. How Long Will You Keep My Personal Data?

9.1 We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long We Keep It
Identity Information including name and title	6 months from submission of the survey request If the survey results in a contract, information will be kept for 7 years after cessation - for corporate memory, re-employment, industrial tribunal, or other litigation purposes
Contact information including collected, address, email address and telephone number	6 months from submission of the survey request If the survey results in a contract, information will be kept for 7 years after cessation - for corporate memory, re-employment, industrial tribunal, or other litigation purposes
Technical information including e.g. IP address	This is automatically traced during the use of our website via statistic software and kept for a maximum of 26 months

10. How and Where Do You Store or Transfer My Personal Data?

10.1 We will only store or transfer your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the Data Protection Legislation, GDPR, and/or to equivalent standards by law.

10.2 We share your data within the group of companies of which we are a part. Where this involves the transfer of personal data outside the EEA, our group ensures that personal data is protected by requiring all companies within the group to follow the same rules with respect to personal data usage. These are known as "binding corporate rules". More information on binding corporate rules is available from the European Commission: Binding Corporate Rules (BCR).

10.3 The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- Limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality; and
- Procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so.

11. Do You Share My Personal Data?

11.1 We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions.

11.2 If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy and Cookie policy.

11.3 In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

11.4 If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Section 9.

12. How Can I Control My Personal Data?

12.1 In addition to your rights under the Data Protection Legislation, set out in Section 5, when you submit personal data via our site, you may be given options to restrict our use of your personal data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided at the point of providing your details.

13. Can I Withhold Information?

13.1 You may access certain areas of our site without providing any personal data at all. However, to use all features and functions available on our Site you may be required to submit or allow for the collection of certain data.

13.2 You may restrict our use of 'cookies. For more information, see Section 15.

14. How Can I Access My Personal Data?

14.1 If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a 'subject access request'.

14.2 All subject access requests should be made in writing and sent to the email or postal addresses shown in Section 16. To make this as easy as possible for you, a Data Subject Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

14.3 There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee

may be charged to cover our administrative costs in responding.

14.4 We will respond to your subject access request not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

15. How Do You Use 'Cookies?

15.1 Our Site may place and access certain first-party 'cookies on your computer or device. First-party 'cookies are those placed directly by us and are used only by us We use 'cookies to facilitate and improve your experience of our site and to provide and improve our products and services. We have carefully chosen these 'cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

15.2 All 'cookies used by and on our site are used in accordance with current Cookie Law.

15.3 Before 'cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those 'cookies. By giving your consent to the placing of 'cookies you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of 'cookies; however certain features of our site may not function fully or as intended.

15.4 Certain features of our Site depend on 'cookies to function. Cookie Law deems these 'cookies to be "strictly necessary". These 'cookies are shown in the table below. Your consent will not be sought to place these 'cookies, but it is still important that you are aware of them. You may still block these 'cookies by changing your internet browser's settings as detailed below, but please be aware that our Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

15.5 The following first-party 'cookies will be placed on your computer or device:

Name of Cookie	Purpose	Strictly Necessary
_tum	Visitor segmentation cookie	Yes
_utmc	Session cookie	Yes
_utma	Unique visitor cookie	Yes
_utmz	Visibility on channels	Yes

15.6 Our Site uses analytics services provided by Google Analytics. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling us to better understand how our site is used. This, in turn, enables us to improve our Site and the products and/or services offered through it.

15.7 The analytics service used by our site uses 'cookies to gather the required information. You do not have to allow us to use these 'cookies, however whilst our use of them does not pose any risk to your privacy or your safe use of our Site, it does enable us to continually improve our Site, making it a better and more useful experience for you.

15.8 The analytics service used by our Site uses the following 'cookies:

Cookie Name	Expiration Time	Description

_ga	2 years	Used to distinguish users.
_gid	24 hours	Used to distinguish users.
_gat	1 minute	Used to throttle request rate. If Google Analytics is deployed via Google Tag Manager, this cookie will be named _dc_gtm_<property-id>.
AMP_TOKEN	30 seconds to 1 year	Contains a token that can be used to retrieve a Client ID from AMP Client ID service. Other possible values indicate opt-out, inflight request or an error retrieving a Client ID from AMP Client ID service.
gac<property-id>	90 days	Contains campaign related information for the user. If you have linked your Google Analytics and Google Ads accounts, Google Ads website conversion tags will read this cookie unless you opt-out. Learn more. Our Google analytics account is not linked to Google Ads.

15.9 In addition to the controls that we provide, you can choose to enable or disable ‘cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all ‘cookies or only third-party ‘cookies. By default, most internet browsers accept ‘cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

15.10 You can choose to delete ‘cookies on your computer or device at any time, however you may lose any information that enables you to access our site more quickly and efficiently including, but not limited to, login and personalisation settings.

15.11 It is recommended that you keep your internet browser and operating system up to date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

15.12 Our site may place and access certain first-party ‘cookies on your computer or device. First-party ‘cookies are those placed directly by us and are used only by us. We use ‘cookies to facilitate and improve your experience of our site and to provide and improve our products and services In addition, our Site uses analytics services provided by Google Analytics which also use ‘cookies. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling us to better understand how people use our site.

16. How Do I Contact You?

16.1 To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

For the attention of Nanette Moulton

Email address: headoffice@securitatemgroup.com

Telephone number: 020 3746 2214

Postal Address: Unit 5 Roebuck Business Park, Ashford Road, Harrietsham, Kent, ME17 1AB

17. Changes to this Privacy and Cookie Policy

17.1 We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

17.2 Any changes will be immediately posted on our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our Site following the alterations. We recommend that you check this page regularly to keep up to date.

18. Compliance

18.1 By signing the annual Policy Acknowledgement Form, employees/workers/contractors are confirming their understanding and acceptance of this policy. If it is found that they are failing to comply with this, disciplinary action may be invoked up to and including termination.

18.2 Any employee who wishes to complain about their treatment under this policy should do so by means of the Grievance procedure. Any issue experienced by a worker/contractor should be brought to the attention of the Operations Director for resolution.

19. Review

19.1 The effectiveness of this policy and associated arrangements will be reviewed annually or when there is a change in circumstances/work practices, or the introduction of new legislation. All reviews and amendments will be made under the direct supervision of the Securitatem Group's CEO.

Group CEO:

Joseph McGee

Policy reviewed: 12/10/2026