



JPR PHOENIX PRIVACY NOTICE

We are JPR PHOENIX LTD.

Our registered trading address is 2 North Road, Penallta Industrial Estate, Hengoed. CF82 7SS. Company Registration number is 6320136.

We are committed to safeguarding your privacy. This policy together with our company data protection policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

JPR PHOENIX LTD is a data controller which means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

What information do we collect

We collect your personal data because it is necessary in relation to taking steps to enter into a contract with you and or the performance of a contract with you, including, but not limited to us servicing and maintaining your security systems.

We may collect, store and use the following kinds of data about you:

- **Information that you give us:** This is information about you that you give us by filling in our forms on site or by corresponding with us by phone, email or otherwise. It includes information you provide when you contact us for a quotation, respond to our emails and contact us to book a routine inspection or report a problem with your security systems. The information you give us may include your name, address, email address and phone number, financial information, arming and disarming times, key holder details and passwords and personal descriptions.
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- **Information that we collect about you:** This is information that you provide us.

We do not collect any sensitive personal data about you, such as information about your race, political opinions or religious beliefs, unless we obtain your explicit consent.

In addition, we do not knowingly collect personal data from or direct our content towards those under the age of 16.

How do we use your personal data?

Personal data submitted to us will be used for the purposes specified in this privacy policy.

We may use your personal data to:

- Carry out obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us.
- Provide you with information about other services that we can offer, which are similar to those that you have already enquired about.
- Send statements and invoices to you and collect payments from you.
- Comply with our statutory and regulatory obligations.
- Deal with enquiries and complaints made by you relating to our services or security systems.

Disclosing your personal data to others

We will not share your personal data with others, unless:

- We are under a duty to disclose or share your personal details in order to comply with any legal obligation, or in order to enforce or apply to our rules.
- Our business enters into a joint venture with, or is sold to or merged with, another business. We may then share your personal details with our new business partners.
- We use third parties to carry out business activities and they require your personal details to do so.

Where relevant, we will require that third parties follow our data protection and privacy policies and we will require that such third parties do not use your personal details for their own business purposes, without your prior consent.

Where do we store your personal data

We store your personal details on a secure server, with in our secure office & control room network.

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alterations of your personal information.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to us. As such any transmission is at your own risk. Once we have received information, we will use strict procedures and security features to prevent unauthorised access.

How Long do we keep your personal data for

We only keep your personal data for as long as is necessary to fulfil the purposes that we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means and the applicable legal requirements.

Our policy with reference to customers that have a contract with us is that we retain your personal data for 10 years. After this period we will contact you and if you require us to erase your personal information this will be carried out.

Our policy with reference to customers that are on a visit only basis is that we will retain their personal information for a period of three years. After this period we will contact you and if you require us to erase your personal information this will be carried out.

Your rights

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a data subject access request). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you. For example if you wanted us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.
- If you want to review, correct or request erasure of your personal information, object to the processing of personal data, or request that we transfer a copy of your

personal information to another party, please write to us at Unit 2, Penallta Industrial Estate, Hengoed CF82 7SS or email us at info@jprphoenix.com.

You will not have to pay a fee to access personal information (or to exercise any of the other rights). However we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

Your right to complain

If you have any problems with the way that we are handling your personal data, you should contact the Information Commissioners Office (ICO).

The ICO can be contacted by telephone on 0303 123 113 Monday to Friday, between 9am and 5pm, or by email at casework@ico.org.uk. You can also visit the ICO website by following this link: <https://ico.org.uk/>.

Changes to our privacy policy

We keep our privacy policy under regular review. This privacy policy was last updated on 27 April 2018.

Data Controller

The data controller responsible for your personal data is JPR PHOENIX LTD company registration number 6320136. Our data protection registration number is Z1430055.

If you have any questions regarding this privacy notice or how we handle your personal information, please contact JPR PHOENIX LTD on 01443 810730.