Privacy Notice Sept 2018





Privacy Notice

We are a Security Services company, trading as Capricorn Security Group Ltd (Company Number 8556714) ("we", "us", "our" or "Capricorn"). Our registered office is at: Wilsons Park, Monsall Road, Newton Heath, Manchester, M40 8WN.

We are committed to safeguarding your privacy. This policy - together with the Capricorn Rules and any other documents referred to on it - 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.

Capricorn Security Group 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?

You supply personal data that includes your name and address. We hold this information to enable us to comply with statutory obligations and to pursue our legitimate interests for the purposes set out in the section below.

How do we use your personal data?

We may use your personal data to:

- Set up officer and customer portfolios for deployment purposes
- Comply with our statutory and regulatory obligations;
- Deal with enquiries and complaints made by you relating to your order for security officers.

If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

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 to comply with any legal obligation or in order to enforce or apply our rules.
- our business enters 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 or owners.

Where we store your personal data

Capricorn Security Group Ltd

Document: Privacy Notice

We store all your personal details on a secure software deployment package, within the European Economic Area.

Head Office: 1035 Oldham Road, Newton Heath, Manchester, M40 2NW Leeds Office: 101-103 Kirkstall Rd, Leeds, LS3 1JL

Page **2** of **4**

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 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.

How secure is my data?

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Your rights

Document: Privacy Notice

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.

Page 3 of 4

Publish Date: Sept 2018

- 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 want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

t: 0161 205 5055 (Manchester) t: 0113 479 0974 (Leeds) e: enquiries@capricornsecurity.co.uk Publish Date: Sept 2018



If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please write to us at Capricorn Security Group, Wilsons Park, Newton Heath, Manchester, M40 8WN or email us at operations@capricornsecurity.co.uk

You will not have to pay a fee to access your 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 Commissioner's Officer (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's website by following this link: https://ico.org.uk/.

Changes to our privacy policy

We keep our privacy policy under regular review and any updates are posted on our site. This privacy policy was last updated on 27th March 2018.

Data Controller

The data controller responsible for your personal data is Capricorn Security Group Ltd (Company Number 8556714.) Our data protection registration number is ZA056531.

If you have any questions about this privacy notice or how we handle your personal information, please contact our Operations Team on 0161 205 5055.

Document: Privacy Notice Page 4 of 4 Publish Date: Sept 2018