



Day2Day Fire & Security Ltd

Trades as: **ITS Fire & Security**

Units 1.2&4 The Granaries
Nuttys Farm, Childerditch Lane
Little Warley, Essex, CM13 3EH
Tel: 0300 303 2536 Email : sharon@itsfire.co.uk;

General Data Protection Regulation (GDPR) Data protection policy

Context and Overview

Key details

- Policy Prepared by: Sharon Alsop
- Approved by Director: Chris Day
- Policy becomes operation on: 16th May 2018
- Next review date: 16th May 2019

Introduction

This Policy sets out the obligations of Day2Day Fire&Security Ltd t/as ITS Fire & Security (**ITS**), a Company incorporated in England under Registration No: 0902 9532, whose address and Registered Office are shown in the Main Header above, regarding data protection and the rights of customers and contacts in respect of their personal data kept and accessed via our staff under the GDPR, whether it be by paper or digital means in the normal course of our business which is:

The installation, maintenance and monitoring of the provision of the following services for payment:

- Intruder Alarms, Fire Alarms
- Emergency Lights, Extinguishers
- Fire Risk Assessments, Fire Warden Training
- Fire Doors, Door Access Systems
- CCTV – Security Camera’s
- Safes & Ad-hoc related services
- RedCARE/Dualcom Secure Signalling to an Alarm Receiving Centre.

This policy describes how this personal data must be collected lawfully, handled and stored to meet the company’s data protection standards – and to comply with the law.

Upon being requested to provide estimates, to do works or provide any of our services for a client, it will be necessary for **ITS** to obtain personal details of individuals or representatives of the Company, firm or organisation requesting us, perhaps to provide estimated costings to fulfil the client’s requirements. The provision of such information will be the legal basis of our recording their freely given details as lawfully held with consent, such information will be input electronically onto the Company’s databases to provide and monitor the service(s) requested.

Day2Day Fire & Security Ltd Registered in England 0902 9532, Vat Reg: 197 6119 68
Registered Office: As per Letterhead
Directors: Rob Day & Chris Day

In partnership with **RSM Refko Ltd** (for Sprinkler System Maintenance)





Day2Day Fire & Security Ltd

Trades as: **ITS Fire & Security**

Units 1.2&4 The Granaries
Nuttys Farm, Childerditch Lane
Little Warley, Essex, CM13 3EH
Tel: 0300 303 2536 Email : sharon@itsfire.co.uk;

Why this policy exists

This data protection policy sets out and ensures that ITS

- Complies with data protection law and follow good practice
- Protects the rights of staff, partners, customers, suppliers and business partners
- Is open about how it stores and processes individuals' data
- Protects itself from the risks of a data breach

Page | 2

Data protection law

The Data Protection Act 1998 shortly to be updated by the GDPR. describes how organisations — including **ITS** — must collect, handle and store personal information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials.

To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The GDPR is underpinned by eight important principles. These say that personal data must:

1. Be processed fairly and lawfully
2. Be obtained only for specific, lawful purposes
3. Be adequate, relevant and not excessive
4. Be accurate and kept up to date
5. Not be held for any longer than necessary in a form that identifies the individual
6. Processed in accordance with the rights of data subjects
7. Be protected in appropriate ways
8. Not be transferred outside the European Economic Area (EEA), unless that country or territory also ensures an adequate level of protection

People, risks and responsibilities

Policy scope

This policy applies to:

- The Office of ITS
- All staff and sub-contractors working on behalf of ITS
- All Main Contractors, suppliers and other people working alongside or on behalf of ITS

Day2Day Fire & Security Ltd Registered in England 0902 9532, Vat Reg: 197 6119 68

Registered Office: As per Letterhead

Directors: Rob Day & Chris Day

In partnership with **RSM Refko Ltd** (for Sprinkler System Maintenance)





Day2Day Fire & Security Ltd

Trades as: **ITS Fire & Security**

Units 1.2&4 The Granaries
Nuttys Farm, Childerditch Lane
Little Warley, Essex, CM13 3EH
Tel: 0300 303 2536 Email : sharon@itsfire.co.uk;

It applies to all data that the company holds relating to identifiable individuals, even if that information technically falls outside of the GDPR. This information can include:

Page | 3

- Names of individuals
- Postal addresses
- Email addresses
- Telephone numbers
- ...plus, any other information relating to or identifying individuals.

Data protection risks

This policy helps to protect ITS from some very real data security risks, including:

- **Breaches of confidentiality.** For instance, information being given out inappropriately.
- **Failing to offer choice.** For instance, all individuals should be free to choose how the company uses data relating to them.
- **Reputational damage.** For instance, the company could suffer if hackers successfully gained access to sensitive data.

Responsibilities

Everyone who works for or with Day2Day Fire&Security Ltd has some responsibility for ensuring data is collected, stored and handled appropriately.

Each team member that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

However, these people have key areas of responsibility:

- The board of directors is ultimately responsible for ensuring that Day2Day Fire&Security Ltd meets its legal obligations.

Day2Day Fire & Security Ltd Registered in England 0902 9532, Vat Reg: 197 6119 68
Registered Office: As per Letterhead
Directors: Rob Day & Chris Day

In partnership with **RSM Refko Ltd** (for Sprinkler System Maintenance)





Day2Day Fire & Security Ltd

Trades as: **ITS Fire & Security**

Units 1.2&4 The Granaries
Nuttys Farm, Childerditch Lane
Little Warley, Essex, CM13 3EH
Tel: 0300 303 2536 Email : sharon@itsfire.co.uk;

- The [data protection officer], Sharon Alsop is responsible for:
 1. Keeping the board updated about data protection responsibilities, risks and issues.
 2. Reviewing all data protection procedures with an agreed schedule.
 3. Arranging data protection training and advice for the people covered by this policy.
 4. Handling data protection questions from staff and anyone else covered by this policy.
 5. Dealing with requests from individuals to see the data Day2Day Fire&Security Ltd holds about them (also called 'subject access requests').
 6. Checking and approving any contracts or agreements with third parties that may handle the company's sensitive data.
- The [IT manager], Steve Armario t/as SA Technology (a sub-contractor) is responsible for:
 - a) Ensuring all systems, services and equipment used for storing data meet acceptable security standards.
 - b) Performing regular checks and scans to ensure security hardware and software is functioning properly.
 - c) Evaluating any third-party services, the company is considering using to store or process data. For instance, cloud computing services.
- The [Admin Director], Chris Day, is responsible for:
 - Approving any data protection statements attached to communications such as emails and letters.
 - Addressing any data protection queries from journalists or media outlets like newspapers.

Page | 4

Day2Day Fire & Security Ltd Registered in England 0902 9532, Vat Reg: 197 6119 68
Registered Office: As per Letterhead
Directors: Rob Day & Chris Day

In partnership with **RSM Refko Ltd** (for Sprinkler System Maintenance)





Day2Day Fire & Security Ltd

Trades as: **ITS Fire & Security**

Units 1.2&4 The Granaries
Nuttys Farm, Childerditch Lane
Little Warley, Essex, CM13 3EH
Tel: 0300 303 2536 Email : sharon@itsfire.co.uk;

- Where necessary, working with other staff and external providers to ensure marketing initiatives abide by data protection principles.

General staff guidelines

Page | 5

- The only people able to access data covered by this policy should be those who need it for their work.
- Data should not be shared informally. When access to confidential information is required, employees can request it from their line managers.
- **ITS** will provide training to all employees to help them understand their responsibilities when handling data.
- Employees should keep all data secure, by taking sensible precautions and following the guidelines below.
- In particular, strong passwords must be used, and they should never be shared
- Personal data should not be disclosed to unauthorised people, either within the company or externally.
- Data should be regularly reviewed and updated if it is found to be out of date. If no longer required, it should be deleted and disposed of.
- Employees should request help from their line manager or the data protection officer if they are unsure about any aspect of data protection.

Data storage

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the IT manager or data controller.

When data is stored on paper, it should be kept in a secure place where unauthorised people cannot see it.

These guidelines also apply to data that is usually stored electronically but has been printed out for some reason:

- When not required, the paper or files should be kept in a locked drawer or

Day2Day Fire & Security Ltd Registered in England 0902 9532, Vat Reg: 197 6119 68
Registered Office: As per Letterhead
Directors: Rob Day & Chris Day

In partnership with **RSM Refko Ltd** (for Sprinkler System Maintenance)





Day2Day Fire & Security Ltd

Trades as: **ITS Fire & Security**

Units 1.2&4 The Granaries
Nuttys Farm, Childerditch Lane
Little Warley, Essex, CM13 3EH
Tel: 0300 303 2536 Email : sharon@itsfire.co.uk;

filing cabinet.

- Employees should make sure paper and printouts are not left where unauthorised people could see them, like on a printer.
- Data printouts should be shredded and disposed of securely when no longer required.

Page | 6

When data is **stored electronically**, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts:

- Data should be protected by **strong passwords** that are changed regularly and never shared between employees.
- If data is **stored on removable media** (like a CD or DVD), these should be kept locked away securely when not being used.
- Data should only be stored on **designated drives and servers**, and should only be uploaded to an **approved cloud computing services**.
- Servers containing personal data should be **sited in a secure location**, away from general office space.
- Data should be **backed up frequently**. Those backups should be tested regularly, in line with the company's standard backup procedures.
- Data should **never be saved directly to laptops** or other mobile devices like tablets or smart phones.
- All servers and computers containing data should be protected by **approved security software and a firewall**.

Data use

Personal data is of no value to **ITS** unless the business can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft:

- When working with personal data, employees should ensure **the screens of their computers are always locked** when left unattended.
- Personal data **should not be shared informally**. It should never be sent by email, as this form of communication is not secure.

Day2Day Fire & Security Ltd Registered in England 0902 9532, Vat Reg: 197 6119 68
Registered Office: As per Letterhead
Directors: Rob Day & Chris Day

In partnership with **RSM Refko Ltd** (for Sprinkler System Maintenance)





Day2Day Fire & Security Ltd

Trades as: **ITS Fire & Security**

Units 1.2&4 The Granaries
Nuttys Farm, Childerditch Lane
Little Warley, Essex, CM13 3EH
Tel: 0300 303 2536 Email : sharon@itsfire.co.uk;

- Data must be **encrypted before being transferred electronically**. The IT manager can explain how to send data to authorised external contacts.

- Personal data should **never be transferred outside of the European Economic Area**.

- Employees **should not save copies of personal data to their own computers**. Always access and update the central copy of any data.

Page | 7

Data accuracy

The law requires **ITS** to take reasonable steps to ensure data is kept accurate and up to date.

The more important it is that the personal data is accurate, the greater the effort Day2Day Fire&Security Ltd should put into ensuring its accuracy.

It is the responsibility of all employees who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible.

- Data will be held in **as few places as necessary**. Staff should not create any unnecessary additional data sets.

- Staff should **take every opportunity to ensure data is updated**. For instance, by confirming a customer's details when they call.

- **ITS** will make it **easy for data subjects to update the information** it holds about them. For instance, via the Alarm Receiving Company website using the Touch facility for monitored alarms or via written request to our office address.

- Data should be **updated as inaccuracies are discovered**. For instance, if a customer can no longer be reached on their stored telephone number, it should be removed from the database.

Subject access requests

All individuals who are the subject of personal data held by ITS are entitled to:

- **The right to know** what information the company holds about them and why.

Day2Day Fire & Security Ltd Registered in England 0902 9532, Vat Reg: 197 6119 68

Registered Office: As per Letterhead

Directors: Rob Day & Chris Day

In partnership with **RSM Refko Ltd** (for Sprinkler System Maintenance)





Day2Day Fire & Security Ltd

Trades as: **ITS Fire & Security**

Units 1.2&4 The Granaries
Nuttys Farm, Childerditch Lane
Little Warley, Essex, CM13 3EH
Tel: 0300 303 2536 Email : sharon@itsfire.co.uk;

- **The right of** Access to it
- **The right of** rectification of errors
- **The right of** erasure
- **The right** to restrict processing
- **The right** to data Portability
- **The right** to object
- **Rights** with respect to automated decision-making and profiling
- **Right** to be informed how the company is **meeting its data protection obligations.**

Page | 8

If an individual, contacts the company requesting this information, this is called a **subject access request.**

Subject access requests from individuals should be made by email, addressed to the data controller at sharon@itsfire.co.uk. The data controller can supply a standard request form, although individuals do not have to use this.

Individuals will be charged £10 per subject access request. The data controller will aim to provide the relevant data within 14 days.

The data controller will always verify the identity of anyone making a subject access request before handing over any information.

Disclosing data for other reasons

In certain circumstances, the GDPR allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, **ITS** will disclose requested data. However, the data controller will ensure the request is legitimate, seeking assistance from the board and from the company's legal advisers where necessary.

Providing information

ITS aims to ensure that individuals are aware that their data is being processed, and that they understand:

- How the data is being used
- How to exercise their rights

DEFINITIONS AND INTERPRETATIONS FOR 'TERMS USED'

Day2Day Fire & Security Ltd Registered in England 0902 9532, Vat Reg: 197 6119 68
Registered Office: As per Letterhead
Directors: Rob Day & Chris Day

In partnership with **RSM Refko Ltd** (for Sprinkler System Maintenance)





Day2Day Fire & Security Ltd

Trades as: **ITS Fire & Security**

Units 1.2&4 The Granaries

Nuttys Farm, Childerditch Lane

Little Warley, Essex, CM13 3EH

Tel: 0300 303 2536 Email : sharon@itsfire.co.uk;

Definitions and Interpretation

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 Paragraphs 39-40

“personal data” means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation (“GDPR”);

Page | 9

IN CONCLUSION

To these ends, the company has a privacy statement, setting out how data relating to individuals is used by the company.

[This is a ‘Living Document’ and will be subject to periodic review, our web site ‘Privacy Policy’ can be viewed online at our Company website(s)]

Chris Day

16th May 2018

Day2Day Fire & Security Ltd Registered in England 0902 9532, Vat Reg: 197 6119 68

Registered Office: As per Letterhead

Directors: Rob Day & Chris Day

In partnership with **RSM Refko Ltd** (for Sprinkler System Maintenance)

