

DATA PROTECTION & PRIVACY POLICY



East Midlands Central Station (EMCS) Limited (hereinafter known as the Company) is committed to protecting and respecting your privacy.

This Policy has been written in for compliance with the General Data Protection Regulation (GDPR) and to explain when and why we collect personal information about people who are employees or our clients or potential clients, how the Company uses it, the conditions under which we may disclose it to others and how we keep it secure. We are registered with the Information Commissioners Office (ICO) and our Registration No. is: **Z9748049**.

We may change this Policy from time to time so please check that you have the current version. If you are using our website, you're agreeing to be bound by this Policy.

Any questions regarding this Policy and our privacy practices should be sent by email to sales@emcs.co.uk or by writing to us at Waterside House, Tissington Close, off Brailsford Way, Chilwell, Nottingham, NG9 6QG.

Who are we?

"An independent Alarm Receiving Centre"

As the only truly independent Alarm Receiving Centre in the country, EMCS have no links whatsoever to an alarm company and are free to provide impartial recommendations on the very best alarm monitoring solution for each individual client. Established in 1987, with just a handful of Intruder Alarm Systems, the Company today provides monitoring services for approximately 75,000 premises across the UK and Ireland covering a range of disciplines including Intruder, Fire, Personal Attack, Medical, Machinery, CCTV, Access Control and Environmental alarms. EMCS is a privately owned, family run business with absolutely no debt and no external investors. Dedicated to staying in the forefront of technology, the Company continues to reinvest in staff, buildings and development of services thereby ensure the best delivery of services to our clients. Our intentions remain to forge longstanding relationships with our clients. This involves listening to their requests and where possible the tailoring of our services accordingly. Our extensive staff selection process, carefully structured development schemes together with our hands-on management team, reinforces our dedication to fostering a long-term loyalty to both the Company and clients. The aim is to have a professional, cheerful, enthusiastic team who have a clear understanding of the needs and expectations of our clients and who are pro-active in our commitment to delivering them.

All of our front and back offices are based in the UK where you can either talk to one of our customer service team to enjoy a more personal touch, or take advantage of our automated response facility. Both are available 24 hours a day, seven days a week. We consider this to be the minimum requirement for a personal Alarm Monitoring Service. In addition, our field advisers will visit you when it's convenient, either at your own or your client's business premises.

Our Alarm Receiving Centre is completely self-contained. All of our facilities are resistant to both physical attack and power failures, and in the extremely unlikely event of a main system failure, we are still able to provide a continuous, uninterrupted back-up service. EMCS have been awarded NSI Gold for the remote monitoring of security and fire alarm systems, are recognised by the SSAIB and are accredited to ISO9001. We were also one of the first Alarm Receiving Centres to be accredited to BS8418 for CCTV monitoring. In addition, we gained approval for monitoring LPS1020 fire systems in December 2007, I.S. 228/PSA33 for the Monitoring of Intruder Alarms in EIRE and BS8484 for the Provision of Lone Worker Device (LWD) Services in November 2014.

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How do we collect information from you?

We obtain information about our:

- a) employees when they initially apply for positions in the Company and
- b) clients when they make an initial enquiry for our services and ongoing through the term of the contract services provided.

What type of information is collected from you?

The personal information we collect is usually limited to name, address, email address, contact telephone number(s). In relation to our clients, this may also include keyholders for the systems.

How is this information used?

We may use this information to:

- process an application for employment (including those required for Security Screening checks current at the time of application) and ongoing through employment for such as pensions, personal taxation and the like;
- process enquiries and orders from our clients;
- to carry out our obligations arising from any contracts entered into;
- dealing with system users and keyholders in relation to installed and maintained systems;
- seeking views or comments on the services we provide;
- notification of changes to our services;
- sending of information which has been requested and that may be of interest. This may include information about terms and conditions, system installations, maintenance & monitoring and the like.

We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our statutory or regulatory obligations (for example Security Screening Records are retained for term of employment plus 7 years, captured CCTV images 31 days unless required to be held for evidential evidence). We will hold your personal information on our systems for as long as is necessary for the relevant activity or as long as is set out in any relevant contract agreement.

Who has access to your information?

We will not sell or rent information to third parties other than the emergency services or in the case of employees for pensions, personal taxation and the like. **Legal disclosures.** We may, in appropriate cases, voluntarily or where required by law, pass your data to the Police and similar organisations such as law enforcement agencies (including fraud prevention and detection) or other governmental agencies.

We will never share information with third parties for marketing purposes.

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Third Party Service Providers working on our behalf: We may pass information to our third-party service providers, agents subcontractors and other associated organisations for the purposes of completing tasks and providing services on our behalf albeit this is normally limited to the Alarm Receiving Centre support systems. However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep all information secure and not to use it for their own direct marketing purposes. Please be reassured that we will never release any information to third parties beyond the emergency services or approved subcontractors for them to use for their own direct marketing purposes in any circumstance unless we are required to do so by law, for example, by a court order or for the purposes of prosecution or prevention of crime.

Third Party Product Providers we work in association with: Due to the nature of our business, we work closely with the emergency services. The emergency services will only use such details to provide information and carry out their obligations arising from any contract entered into with us. However, we take steps to ensure that everyone's privacy rights continue to be protected.

Your choices

You will always have a choice about whether or not you wish to receive information from us. However, the Company does undertake direct marketing. All direct marketing is undertaken strictly in line with current ICO guidelines. These are:

We will only carry out unsolicited electronic marketing if the person we are targeting has given us their permission. However, there is an exception to this rule known as the 'soft opt-in' and this will only be used when the following conditions are met;

- where we have obtained your details in the course of a sale or negotiations for a sale of a product or service;
- where the messages are only marketing similar products or services; and
- where you are given a simple opportunity to refuse marketing when their details are collected, and if you do not opt out at this point, you are given a simple way to do so in future messages.

When we send an electronic marketing message (other than e-mails), we will tell the recipient who we are and provide a valid contact address. In the case of e-mails, we will identify ourselves and provide an address.

The Telephone Preference Service (TPS) and Fax Preference Service (FPS) are operated by the Direct Marketing Association, and allow people to register their numbers to opt out of receiving unsolicited calls or faxes. We will not market individuals or organisations who have registered their numbers with the TPS or FPS.

In summary, we will ensure that our marketing campaigns are always permission-based and we explain clearly what any personal details will be used for. We will provide a simple way for you to opt out of marketing messages and have a system in place for dealing with complaints.

How you can access and update your information

The accuracy of your information is important to us. If you change email address, or any of the other information we hold is inaccurate or out of date, please email us at: sales@emcs.co.uk or by writing to us at Waterside House, Tissington Close, off Brailsford Way, Chilwell, Nottingham, NG9 6QG.

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You have the right to ask for a copy of the information the Company holds about you (we may charge £10 for information requests) to cover our costs in providing you with details of the information we hold about you.

In certain circumstances, such as where the data is no longer necessary for the purposes for which it was collected, you have a right to require us to erase all personal data held about you.

Note: There are a number of exemptions to this right, for example in relation to freedom of expression and compliance with legal obligations.

Security precautions in place to protect the loss, misuse or alteration of your information

When you give us personal information, we take steps to ensure that it's kept securely.

Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our IT Systems (soft copy information) or held securely in our offices (hard copy information).

System users. Where we have given you a password or passcode for identifying you as an authorised system user, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Profiling

We do not analyse your personal information to create a profile of your usage or any other such as interests and preferences so that we can contact you with information relevant to you.

We may make use of the information about you in order to provide you with information that directly affects you or in the case of system users, their system.

Use of 'cookies'

Like many other websites, the Company website does use cookies. We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service. They enable us:

- To estimate our audience size and usage pattern.
- To store information about your preferences, and so allow us to customise our site according to your individual interests.
- To speed up your searches.
- To recognise you when you return to our site.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.

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Links to other websites

Our website may contain links to other websites run by other organisations. However, these are limited to our Certifications/Accreditations namely, NSI, SIA, PSA and the like. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access these using links from our website.

In addition, if you linked to our website from a third-party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third-party site and recommend that you check the policy of that third-party site.

18 or Under

We are concerned to protect the privacy of children aged 18 or under (although under the GDPR this is currently the under 16's). If you are aged 18 or under, please get your parent/guardian's permission beforehand whenever you provide us with personal information.

Transferring your information outside of Europe

As part of any application for employment or the services offered to you, the information which you provide to us may be transferred to countries outside the European Union ("EU").

These countries may not have similar data protection laws to the UK. By submitting your personal data, you're agreeing to this transfer, storing or processing. If we transfer your information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.

If you access our services while you are outside the EU, your information may be transferred outside the EU in order to provide you with those services.

Website recording

At the time of publication of this Policy, our web site does not use any web site recording service. Should this change then this Policy will be updated to reflect this change.

Your Rights Under Data Protection Legislation

You have various rights under data protection legislation:

- (a) your right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.
- (b) You're right to correct any errors in the information we hold about you, and to change and correct any details you have already given us. Please inform us about any changes to your details so that we can keep our records accurate and up to date.
- (c) You're right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by writing to us at sales@emcs.co.uk or by writing to us at Waterside House, Tissington Close, off Brailsford Way, Chilwell, Nottingham, NG9 6QG.

Review of this Policy

We keep this Policy under regular review. This Policy was last updated in March 2018.