

Pagoda Security & Facilities Management Ltd takes your privacy very seriously. This Privacy Notice is intended to set out your rights and answer any queries you may have about your personal data. If you need more information, please contact:

**Data controller:** Pagoda Security & Facilities Management Ltd, Office Suite, King & Queen, 13-16 Marlborough Place, Brighton. BN1 1UB

**Data protection officer:** Simon Errey, [hr@pagodasecurity.co.uk](mailto:hr@pagodasecurity.co.uk) , 01273 916888

Our personal information handling policy and procedures have been developed in line with the requirements of the 1995 European Union Data Protection Directive (Directive 95/46/EC) and the General Data Protection Regulation (in force from 25 May 2018) and applicable national law.

## **1. What information do we collect?**

We collect and process personal data about you when you interact with us and our products and when you purchase goods and services from us.

The organisation collects and processes a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number,
- the terms and conditions of your contract;
- details of your billing information for the organisation;
- information about any other emergency contacts;
- Site details including keys, alarm codes and risk assessments
- Call outs and incidents

## **2. How do we use this information and what is the legal basis for this use?**

We process the personal data listed in paragraph 1 above for the following purposes:

- as required to establish and fulfill a contract with you, for example, if you make a purchase from us or enter into an agreement to provide or receive services. This may include verifying your identity, taking payments, communicating with you, providing customer services and arranging the delivery or other provision of products or services. We require this information in order to enter into a contract with you and are unable to do so without it;
- to comply with applicable law and regulation in accordance with our legitimate interests in protecting Pagoda Security & Facilities Management Ltd's legitimate business interests and legal rights, including but not limited to, use in connection

- with legal claims, compliance, regulatory and investigative purposes (including disclosure of such information in connection with legal process or litigation);
- with your express consent to respond to any comments or complaints we may receive from you, and/or in accordance with our legitimate interests including to investigate any complaints received from you or from others, about our website or our products or services;
  - we may use information you provide to personalise (i) our communications to you; (ii) our website; and (iii) products or services for you, in accordance with our legitimate interests;
  - to monitor use of our websites and online services. We may use your information to help us check, improve and protect our products, content, services and websites, both online and offline, in accordance with our legitimate interests;
  - we may monitor any customer account to prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime, in accordance with applicable law and our legitimate interests;

### **3. With whom and where will we share your personal data?**

We may share your personal data with our subsidiaries to process it for the purposes of inter-group administration and to deliver products or services where elements of these are provided by group companies other than those with which you have directly contracted.

We may also share your personal data with the below third parties:

- Emergency services
- Emergency contacts
- Credit reference agencies

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if needed for the legal protection of our legitimate interests in compliance with applicable laws. Personal data may also be shared with third party service providers who will process it on behalf of Pagoda Security & Facilities Management Ltd for the purposes above.

In the event that our business or any part of it is sold or integrated with another business, your details will be disclosed to our advisers and those of any prospective purchaser and will be passed to the new owners of the business.

### **4. How long will you keep my personal data?**

We will not keep your personal information for any purpose for longer than is necessary and will only retain the personal information that is necessary in relation to the purpose. We are also required to retain certain information as required by law or for as long as is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions.

Where you are a customer, we will keep your information for the length of any contractual relationship you have with us and after that for a period of 12 months.

Where you are a prospective customer and you have expressly consented to us contacting you, we will only retain your data (a) until you unsubscribe from our communications; or, if you have not unsubscribed, (b) while you interact with us and our content; or (c) for 12 months from when you last interacted with us or our content.

In the case of any contact you may have with us, we will retain those details for as long as is necessary to resolve your query and for two weeks after the query is closed.

We will retain your data for a short time beyond the specified retention period, to allow for information to be reviewed and any deletion to take place. In some instances, laws may require Pagoda Security & Facilities Management Ltd to hold certain information for specific periods other than those listed above.

## **5. Where is my data stored?**

The personal data that we collect from you may be transferred to, and stored outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers, in which case the third country's data protection laws will have been approved as adequate by the European Commission or other applicable safeguards are in place.

## **6. What are my rights in relation to my personal data?**

You have the right to ask us not to process your personal data for marketing purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data, clicking the unsubscribe button on any communication we have sent to you or by contacting us.

Where you have consented to us using your personal data, you can withdraw that consent at any time.

If the information we hold about you is inaccurate or incomplete, you can notify us and ask us to correct or supplement it.

You also have the right, with some exceptions and qualifications, to ask us to provide a copy of any personal data we hold about you.

Where you have provided your data to us and it is processed by automated means, you may be able to request that we provide it to you in a structured, machine readable format.

If you have a complaint about how we have handled your personal data, you may be able to ask us to restrict how we use your personal data while your complaint is resolved. In some circumstances you can ask us to erase your personal data (a) by withdrawing your consent for us to use it; (b) if it is no longer necessary for us to use your personal data; (c) if you object to the use of your personal data and we don't have a good reason to continue to use it; or (d) if we haven't handled your personal data in accordance with our obligations.

**7. Where can I find more information about Pagoda Security & Facilities Management Ltd 's handling of my data?**

Should you have any queries regarding this Privacy Notice, about Pagoda Security & Facilities Management Ltd 's processing of your personal data or wish to exercise your rights you can contact Pagoda Security & Facilities Management Ltd's Privacy Team using this email [hr@pagodasecurity.co.uk](mailto:hr@pagodasecurity.co.uk). If you are not happy with our response, you can contact the Information Commissioner's Office: <https://ico.org.uk/>