



Safeguard Pest Control LTD GDPR REC Privacy Notice

GDPR REC_4.1 (V1)

May 18, 2018



Safeguard Pest Control LTD- GDPR Privacy Notice
GDPR REC_4.1 (V1)

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| Version # | Implemented By | Revision Date | Approved By | Approval Date | Reason |
|-----------|-----------------------------|---------------|-------------|---------------|----------------|
| 1 | Joe Ward and Kevin Morrison | 5/18/2018 | | | Initial Policy |
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Safeguard Pest Control LTD- GDPR Privacy Notice

GDPR REC_4.1 (V1)

1. Executive Summary

This applies to all data subjects whose personal data is collected, in line with the requirements of the GDPR.

2. Responsibilities

- 2.1 The Data Protection Officer / GDPR Owner is responsible for ensuring that this notice is made available to data subjects prior to Safeguard collecting/processing their personal data.
- 2.2 All Employees/Staff of Safeguard who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.
- 2.3 Designated Employees/Staff of Safeguard are responsible for ensuring that the applicable Consent Statement as set out in Schedule A to this Privacy Notice is presented to and completed by all interested parties. A copy of the policy is posted on our website at <http://www.Safeguardgroup.co.uk>.

3. Privacy notice

3.1 Who are we?

Safeguard Pest Control LTD is a pest control company that provides among other things pest control and , bird control services. Safeguard is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the GDPR.

Safeguard is a "data controller". This 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.

This notice applies to current and former employees, workers and contractors. This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time. This notice also may apply as noted to customers and vendors of Safeguard, as appropriate.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Our Data Protection Officer / GDPR Owner and data protection representatives can be contacted directly here:

- GDPR Owner: Mrs. Joanne Read
- Joanne@Safeguardgroup.co.uk
- (O) 0121 443 1111



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- (M) 0766 614 6409

3.2 Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are “special categories” of more sensitive personal data which require a higher level of protection.

Depending on your relationship with Safeguard, that is whether you are an employee or former employee, a contractor hired by Safeguard, a vendor providing services or goods to Safeguard, or a customer of Safeguard, we may collect, store, and use the following categories of personal information:

- Contact details such as name, title, addresses, telephone numbers, and email addresses.
- Date of birth.
- Gender.
- Marital status and dependants.
- Next of kin and emergency contact information.
- National Insurance number.
- Bank account details, payroll records and tax status information.
- Salary, annual leave, pension and benefits information.
- Start date.
- Location of employment or workplace.
- Copy of driving licence.



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- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process).
- Employment records (including job titles, work history, working hours, training records and professional memberships).
- Salary history.
- Performance information.
- Disciplinary and grievance information.
- CCTV footage and other information obtained through electronic means such as swipe card records.
- Information about your use of our information and communications systems.
- Photographs.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Trade union membership.
- Information about your health, including any medical condition, health and sickness records.
- Genetic information and biometric data.
- Information about criminal convictions and offences.

How we use particularly sensitive personal information

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations or exercise rights in connection with employment.
3. Where it is needed in the public interest, such as for equal opportunities monitoring.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public. We may also process such information about members or former members in the course of legitimate business activities with the appropriate Safeguard.



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Our obligations as an employer

We will use your particularly sensitive personal information in the following ways:

- We will use information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws.
- We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.
- We will use trade union membership information to pay trade union premiums, register the status of a protected employee and to comply with employment law obligations.

Do we need your consent?

We do not need your consent if we use special categories of your personal information to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

Information about criminal convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We do not envisage that we will hold information about criminal convictions.

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will



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collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of you working for us.

How is your personal information collected?

We collect personal information about employees, workers, customers, and contactors through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies

We will collect additional personal information in the course of job-related activities throughout the period of you working for us.

Our obligations as a service provider

We will use personal information about you in the following ways:

- We will use information about you so that we can provide you the services for which you have engaged us to provide.
- We will use information about you to be able to invoice for and collect for any services that we perform under your agreement with us.
- We will use the information about you to maintain records necessary to satisfy any regulatory governing agency requirements.

How is your personal information collected?

We collect personal information about customers when they enter into agreements with us to provide identified services. This information is generally received directly from the customer. We may sometimes collect additional information from third parties including credit reference agencies or other similar agencies

3.3 Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified, herein. Consent is required for Safeguard to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will tell you why and how the information will be used. See Schedule A for the Consent Form.

You may withdraw consent at any time. To withdraw your consent, please contact the GDPR Owner. You will then need to submit to the GDPR Owner a Consent Withdrawal Form as set out in Schedule B to the privacy notice. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

3.4 Disclosure

How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:



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1. Where we need to perform the contract we have entered into with you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest.

Situations in which we will use your personal information

We need all the categories of information in the lists above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

- Making a decision about your recruitment or appointment.
- Determining the terms on which you work for us.
- Checking you is legally entitled to work in the UK.
- Paying you and, if you are an employee, deducting tax and National Insurance contributions.
- Liaising with your pension provider.
- Administering the contract we have entered into with you.
- Business management and planning, including accounting and auditing.
- Conducting performance reviews, managing performance and determining performance requirements.
- Making decisions about salary reviews and compensation.
- Assessing qualifications for a particular job or task, including decisions about promotions.
- Gathering evidence for possible grievance or disciplinary hearings.
- Education, training and development requirements.
- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work.



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- Ascertaining your fitness to work.
- Managing sickness absence.
- Complying with health and safety obligations.
- To prevent fraud.
- To monitor your use of our information and communication systems to ensure compliance with our IT policies.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- To conduct data analytics studies to review and better understand employee retention and attrition rates.
- Equal opportunities monitoring.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

[If you fail to provide personal information](#)

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit or providing services to your structure), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

[Change of purpose](#)

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. 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.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

[Automated decision-making](#)

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

1. Where we have notified you of the decision and given you 21 days to request reconsideration.



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2. Where it is necessary to perform the contract with you and appropriate measures are in place to Safeguard your rights.
3. In limited circumstances, with your explicit written consent and where appropriate measures are in place to guard your rights.

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to guard your rights.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

Data sharing

We may have to share your data with third parties, including third-party service providers and other entities in the group.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU; however, at present we do not anticipate any need to do so. If we do, you can expect a similar degree of protection in respect of your personal information.

Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents) and other entities within our group. The following activities are carried out by third-party service providers: payroll, pension administration, benefits provision, background checks, credit related checks, service related data and records management, and administration and IT services.

How secure is my information with third-party service providers and other entities in our group?

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.



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When might you share my personal information with other entities in the group?

We will share your personal information with other entities in our group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data.

What about other third parties?

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

Data security

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

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.

3.5 Retention period

Safeguard will only retain your personal information for as long as 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.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee, worker, customer, or contractor of the company we will retain as required and securely destroy your personal information.



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3.6 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Safeguard refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.7 below.
- 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 contact the GDPR Owner responsible for privacy in writing.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.5 above) in the processing of your personal data.

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.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

3.7 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Safeguard (or third parties as described in 3.4 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Safeguard's data protection representatives Data Protection Officer / GDPR Owner.



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We have appointed a GDPR Owner to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the GDPR Owner. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

3.8 Privacy statement

Read more about how and why we use your data below.

4. Online privacy statement

Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

“any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

How we use your information

This privacy notice tells you how we, Safeguard, will collect and use your personal data.

Why does Safeguard need to collect and store personal data?

In order for us to provide you with employment or contract related information or services we need to collect personal data. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

In terms of being contacted for marketing purposes Safeguard would contact you for additional consent.

Will Safeguard share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to Safeguard in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf.

When they no longer need your data to fulfil this service, they will dispose of the details in line with Safeguard's procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

How will Safeguard use the personal data it collects about me?

Safeguard will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. Safeguard is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be



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governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

Under what circumstances will Safeguard contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

Can I find out the personal data that the organisation holds about me?

Safeguard at your request, can confirm what information we hold about you and how it is processed. If Safeguard does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Safeguard or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

What forms of ID will I need to provide in order to access this?

Safeguard accepts the following forms of ID when information on your personal data is requested: passport; driving licence; birth certificate, utility bills (from the last three months); and valid government issued identity cards. Other forms may be added based on a review and approval of Safeguard.

Contact details of the Data Protection Officer / GDPR Owner:



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| | GDPR Owner contact details |
|-----------------|-------------------------------------|
| Contact Name: | Mrs. Joanne Read |
| Address line 1: | Pear Tree House |
| Address line 2: | Sale Green |
| Address line 3: | Droitwich |
| Address line 4: | Worcestershire |
| Address line 5: | WR9 7LN |
| Email: | Joanne@Safeguardgroup.co.uk |
| Telephone: | (O) 0121 443 1111 (M) 0776 614 6409 |

Document Owner and Approval

The Data Protection Officer / GDPR Owner is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all on the Company website <http://www.Safeguardgroup.co.uk> and is published with the Company policies.

This Privacy Notice was approved by the GDPR Owner on 25th May 2018 and is issued on a version controlled basis under his/her signature.



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SCHEDULE A
CONSENT STATEMENT

- 1.1 I hereby grant Safeguard Pest Control LTD, (and where required a third party processor), authority to process my personal data for legitimate reasons which are in adherence and conform with the requirements of the General Data Protection Regulation. A copy of the Privacy Notice may be found at <http://www.Safeguardgroup.co.uk>.
- 1.2 I am aware that I may withdraw my consent at any time by using the Data Subject Consent Withdrawal Form.

Signed by data subject:

Print Name:

Date:



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SCHEDULE B
CONSENT WITHDRAWAL FORM

GDPR – Consent Withdrawal Form

1.3 I hereby withdraw my consent to process my personal data from Safeguard Pest Control LTD (“Safeguard”).
Safeguard no longer has my consent to process my personal data for the purpose of
.....
.....
.....
..... which was previously granted.

Signed by data subject: Print Name:
.....

Date:

Request actioned:

Signed GDPR Owner: Print Name:
.....

Date: