

PRIVACY STATEMENT

INTRODUCTION

We are Avantguard Security Limited, trading as Avantguard Security (Company number: 6789692). Our registered office is at 55-57 Sea Lane, Rustington, West Sussex, BN16 2RQ.

We are committed to safeguarding your privacy. This statement together with our General Data Protection Policy – sets out the basis on which any personal data we collect from you, or that you provide to us, or will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and what we will do with it.

Avantguard 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 the General Data Protection Regulation (2016/379) to notify you of the information contained in this privacy statement.

It is important that you read this statement, together with any other policy that we might 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 is Anthony Woolcott.

THE PERSONAL DATA WE COLLECT

We collect your personal data because it is necessary, in relation to taking steps to enter into a contract with you and/or performance of a contract with you. We may collect, store and use the following kinds of data about you:

- **Information that you give to us:** This is information about you that you give to us by filling out forms on our website, or corresponding with us by telephone, email or otherwise. This includes, but is not limited to information you provide when you apply for a job, enquire about a contract or when speaking to us at a marketing event. The information you give to us might include your name, address, email address, phone number. Please note that we only collect information from you that is necessary to fulfil the purpose we require it for.
- **Information we collect about you:** When visiting our website, blog, and/or social media channels, we automatically collect the following information (Please note that we only use this information for analytical purposes, we do not use this information to contact you):
 - IP address
 - Geographical location
 - Browser type
 - Referral source
 - Length of visit
 - Number of page views
- **Information we receive from other sources:** We may receive your information when we work with third parties, this includes but is not limited to; business partners, sub-contractors, advertising networks. However, we will notify you when we receive information about you

from other sources and the purposes for which we intend to use this information. For example, referrals.

We do not collect any sensitive personal data about you, such as information about your race, political opinions or religious beliefs – if we are required to collect special personal data we will always obtain your explicit consent first. In addition, we do not knowingly collect personal data from, or direct our content towards those under the age of 16.

OUR LAWFUL BASIS FOR USING THIS DATA

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Fulfil a contract we have entered into with you
- Comply with a legal obligation
- Carry out a task in the public interest

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests)
- We have legitimate interests in processing the data, such as direct marketing

Where you have provided us with consent to use your data, you may withdraw your consent at any time. We will make this clear when requesting your consent, and explain how you go about withdrawing consent if you wish to do so. Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify Avantguard's use of your data.

HOW WE USE THIS DATA

Personal data collected or obtained in the ways mentioned above will be used for the purposes specified in this privacy statement. We may use personal data to:

- Carry out our obligations arising from any contracts entered into between you and us and to provide you with the information about services and jobs that you request from us.
- Provide you with information about other services we provide, which may interest you.
- Send statements and invoices and make payments to you.
- Comply with our statutory and regulatory obligations.
- To deal with enquiries and complaints.

You can withdraw consent to any marketing emails, at any time, by emailing:

sales@avantguardsecurity.co.uk

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HOW WE STORE PERSONAL DATA

Avantguard stores all personal data on a secure server, within the European Economic Area. We will take reasonable, technical and organisational precautions to prevent the loss, misuse or alteration of your personal data.

Where Avantguard shares personal data with a third party processor, we will ensure that we only work with processors who can provide sufficient guarantees that they are compliant with the General Data Protection Regulation. We will also establish a data sharing agreement, where a risk assessment deems it necessary, with the processors, either as a contract or a standalone agreement, to ensure the fair and lawful processing of any personal data that we share. We will, only share data that the third party needs to carry out their service.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site. As such, any transmission is at your own risk. However, once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

HOW LONG DO WE KEEP PERSONAL DATA FOR?

Avantguard only keeps personal data for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying 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 for 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 within the applicable legal requirements.

HOW SECURE IS YOUR PERSONAL DATA?

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way, altered or disclosed.

Further to this, we only allow access to personal data to employees, suppliers and other third parties on a need to know basis. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have procedures in place to deal with any suspected data security breach and will notify you (and any other necessary individuals) and the Information Commissioners Office in the event of a breach.

DATA SHARING

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so. Where it is legally required, or necessary (and it complies with general data protection law) we may share personal information about you when:

- We are under a duty to disclose or share your personal data in order to comply with legal or regulatory obligations, or in order to enforce or apply our own rules.
- We use third parties to carry out business activities and they require your personal details to do so. This may include analytics and search engine providers that assist us in the improvement and optimisation of our site.
- You have given explicit consent to it being shared with third parties for relevant marketing activities, as per below

Where relevant, we will ensure that the third parties that we work with follow the General Data Protection Regulation (2016/379) and we will ensure that those third parties do not use your personal information for their business purposes, without your prior, explicit consent.

YOUR RIGHTS

Under the General Data Protection Regulation, where Avantguard holds your personal data, you have the right to:

- Request access to your personal information. This allows you to ask Avantguard for all of the personal information that we hold about you. This is known as a subject access request.
- Request that your personal information is corrected. This allows you to have any incorrect or out of date information about you changed.
- Request the right to be forgotten. This allows you to ask use to delete or remove personal data where there is no good, or legal reason for us to continue to process it. You also have the right to ask us to delete or remove information where you have exercised your right to object to us processing your personal data.
- Object to processing of your personal data where we are relying on a legitimate interest 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 data for direct marketing purposes.
- Request the restriction of processing your personal data. This allows you to ask us to suspend the processing of your personal data, for example, if you wanted to check the accuracy of the information we hold about you.

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We print double sided as part of our **ENVIRONMENTAL Policy**

If you would like to review, verify, correct, or request the removal of your personal data, object to the processing of your personal data, please contact **Anthony Woolcott** at aww@avantguardsecurity.co.uk and we ensure this is completed within 30 days.

If you make a subject access request, and if we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

Avantguard does not ordinarily charge for subject access requests, however, we reserve the right to charge £10.00 for any requests that may be deemed excessive or repetitive. Where a request is deemed to be excessive or repetitive, the period of completion will be extended to 60 days. Alternatively, we may refuse to comply with the request in such circumstances.

COOKIES

Cookies are text files, placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track your use of a website and to compile analytical reports on the activity taking place on our website and blog.

The Interactive Advertising Bureau (IAB) is an industry body that provides in-depth information about cookies. You can set your browser not to accept cookies and the IAB website provides instruction on how to do this. However, in some instances, some parts of our website/blog may not function if you do not allow cookies from your browser(s).

We can automatically collect and store the following information about your visit to our site:

- The internet domain and IP address from where you access our sites.
- The type of browser software and operating system used to access our sites.
- The data and time that you accessed our sites.
- The pages you visit on our sites, including landing and exit pages.
- If you linked to our site from another site, and the address of that site.

The cookies we use are 'analytical' cookies. They allow us to identify click stream patterns, to improve our site and learn about a number of visitors to our site – as well as the types of technology that our visitors use.

We only use this information to ensure that our site stays compatible with a selection of browsers and systems and to ensure that our site appeals to the wider, intended audience.

MARKETING

You have the right to ask us not to process your personal data for marketing purposes. We will inform you – before we collect your data. If we intend to use 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 not checking certain boxes on the forms we use to collect your data and you can exercise the right, at any time, by contacting:

aww@avantguardsecurity.co.uk

COMPLAINTS

Avantguard take any complaints about our collection and use of personal information very seriously. If you have any problems with the way that we are handling your personal data, in the first instance, please contact **Anthony Woolcott** at aww@avantguardsecurity.co.uk and we will endeavour to resolve the situation.

Alternatively, you can make a complaint to the Information Commissioners Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

DATA CONTROLLER AND DATA PROTECTION OFFICER

The data controller responsible for your personal data is Avantguard Security Limited, trading as Avantguard Security (Company Number 6789692.)

If you have any questions about this privacy notice or how we handle personal information, please contact our data protection officer.

Our data protection officer is **Anthony Woolcott** – aww@avantguardsecurity.co.uk

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