CUSTOMER PRIVACY POLICY

Specialist Protection Services Ltd (SPS) is a company registered in England and Wales. In this policy we will be referred to as "SPS".

OVERVIEW

Maintaining the security of your data is a priority at SPS, and we are committed to respecting your privacy rights. We pledge to handle your data fairly and legally at all times. SPS is also dedicated to being transparent about what data we collect about you and how we use it.

This policy, which applies whether you visit our website to obtain our services or make a job application, provides you with information about:

- how we use your data;
- what personal data we collect;
- how we ensure your privacy is maintained; and
- your legal rights relating to your personal data.

HOW WE USE YOUR DATA

General

SPS Ltd uses your personal data:

- to provide security services to you;
- to make a tailored website available to you;
- to verify your identity;

- for crime and fraud prevention, detection and related purposes;

-to participate in recruitment and selection services where appropriate and you have applied for a job vacancy;

- for market research purposes - to better understand your needs;

- to enable SPS to manage customer service interactions with you; and

- where we have a legal right or duty to use or disclose your information (for example in relation to an investigation by a public authority or in a legal dispute).

Sharing data with third parties

In order to make certain services available to you, we may need to share your personal data with some of our service partners. These include IT and marketing service providers.

SPS only allows its service providers to handle your personal data when we have confirmed that they apply appropriate data protection and security controls. We also impose contractual obligations on service providers relating to data protection and security, which mean they can only use your data to provide services to SPS and to you, and for no other purposes.

Other third parties

Aside from our service providers, SPS will not disclose your personal data to any third party, except as set out below. We will never sell or rent our customer data to other organisations for marketing purposes.

We may share your data with:

- governmental bodies, regulators, law enforcement agencies, courts/tribunals and insurers where we are required to do so: -

- to comply with our legal obligations;
- to exercise our or your legal rights (for example in court cases);
- for the prevention, detection, investigation of crime or prosecution of offenders; and
- for the protection of our employees and customers.

International transfers

To provide our services to you, it may sometimes be necessary for SPS to share your data outside of the European Economic Area. This will typically occur when you are located outside the EEA or if you are based outside the EEA.

If this happens, we will ensure that the transfer will be compliant with data protection law and all personal data will be secure.

How long do we keep your data?

We will not retain your data for longer than necessary for the purposes set out in this Policy. Different retention periods apply for different types of data, however the longest we will normally hold any personal data is 6 years.

WHAT PERSONAL DATA DO WE COLLECT?

SPS may collect the following information about you:

- your name, age/date of birth and gender;

- your contact details: postal address including billing and delivery addresses, telephone numbers (including mobile numbers) and e-mail address;

- your on-line browsing activities on SPS websites;

- your interests, preferences, feedback and survey responses;
- your location;
- your correspondence and communications with SPS; and

- other publicly available personal data, including any which you have shared via a public platform (such as a Twitter feed or public Facebook page).

Our website is not intended for children and we do not knowingly collect data relating to children.

This list is not exhaustive and, in specific instances, we may need to collect additional data for the purposes set out in this Policy. Some of the above personal data is collected directly, for example when you set contact us via the website, or send an email to our customer services team. We may also collect personal data from third parties who have your consent to pass your details to us, or from publicly available sources.

HOW WE PROTECT YOUR DATA

Our controls

SPS is committed to keeping your personal data safe and secure.

Our security measures include: -

- encryption of data where appropriate;

- regular scenario planning and crisis management exercises to ensure we are ready to respond to cyber security attacks and data security incidents;

- regular testing of systems;

- security controls which protect the entire SPS' IT infrastructure from external attack and unauthorised access

WHAT YOU CAN DO TO HELP PROTECT YOUR DATA

SPS will never ask you to confirm any bank account or credit card details via email. If you receive an email claiming to be from SPS asking you to do so, please ignore it and do not respond.

If you are using a computing device in a public location, we recommend that you always log out and close the website browser when you complete an online session.

In addition, we recommend that you take the following security measures to enhance your online safety both in relation to SPS and more generally: -

- keep your account passwords private. Remember, anybody who knows your password may access your account.

- when creating a password, use at least 8 characters. A combination of letters and numbers is best. Do not use dictionary words, your name, email address, or other personal data that can be easily obtained. We also recommend that you frequently change your passwords.

- avoid using the same password for multiple online accounts.

YOUR RIGHTS

You have the following rights:

- the right to ask what personal data that we hold about you at any time.

- the right to ask us to update and correct any out-of-date or incorrect personal data that we hold about you free of charge;

-the right to request that your data is erased from our records.

Legal basis for SPS processing customer personal data

General

SPS collects and uses website visitor's' personal data because is it necessary for:

- the pursuit of our legitimate interests (as set out below);
- recruitment and selection purposes
- complying with our legal obligations.

Our legitimate interests

The normal legal basis for processing customer data, is that it is necessary for the legitimate interests of SPS, including:-

- selling and supplying services to our customers;

- protecting customers, employees and other individuals and maintaining their safety, health and welfare;

- promoting, marketing and advertising our products and services;
- continually improving our services;
- complying with our legal and regulatory obligations;

- preventing, investigating and detecting crime, fraud or anti-social behaviour and prosecuting offenders, including working with law enforcement agencies;

- handling customer contacts, queries, complaints or disputes;
- effectively handling any legal claims or regulatory enforcement actions taken against SPS; and
- fulfilling our duties to our customers, colleagues and other stakeholders.

CONTACT INFORMATION

If you have any questions about how SPS uses your personal data that are not answered here, or if you want to exercise your rights regarding your personal data, please contact us by any of the following means:

info@specialistprotection.com

You have the right to lodge a complaint with the Information Commissioner's Office. Further information, including contact details, is available at <u>https://ico.org.uk</u>.