



Hound Security

Always on guard

Privacy Policy

1. Introduction

Hound Security Limited is committed to conducting its business in accordance with all applicable laws and regulations in respect of Personal Data, and the protection of the “rights and freedoms” of individuals whose information Hound Security Limited collects and processes in accordance with the EU’s General Data Protection Regulation (GDPR). This policy sets forth the expected behaviours of Hound Security’s Employees and Third Parties in relation to the collection, use, retention, transfer, disclosure and deletion of any Personal Data belonging to a Hound Security Limited customer (i.e. the Data Subject). Personal Data is 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. Personal Data is subject to certain legal safeguards and other regulations, which impose restrictions on how organisations may process Personal Data. An organisation that handles Personal Data and makes decisions about its use is known as a Data Controller. Hound Security Limited, as a Data Controller, is responsible for ensuring compliance with the Data Protection requirements outlined in this policy. Non-compliance may expose Hound Security Limited to complaints, regulatory action, fines and/or reputational damage. Hound Security Limited is fully committed to ensuring continued and effective implementation of this policy and expects all Hound Security Limited’s Employees and Third Parties to share in this commitment. Any breach of this policy will be taken seriously and may result in disciplinary action or business sanction.

2. Scope

This policy applies to all processing of Personal Data in electronic form (including electronic mail and documents created with word processing software) or where it is held in manual files that are structured in a way that allows ready access to information about individuals. This policy has been designed to establish a standard for the processing and protection of Personal Data by Hound Security Limited. Where national law imposes a requirement, which is stricter than imposed by this policy, the requirements in national law must be followed. Furthermore, where national law imposes a requirement that is not addressed in this policy, the relevant national law must be adhered to.

3. Definitions

Employee	An individual who works part-time or full-time for Hound Security Limited under a contract of employment, whether oral or written, express or implied, and has recognised rights and duties. Includes temporary employees and independent contractors.
Third Party	External organisations with which a Hound Security Limited company conducts business and is also authorised to, under the direct authority of Hound Security Limited, process the Personal Data of Hound Security Limited contacts
Personal Data	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
Customer	Any past, current or prospective Hound Security Limited customer.
Identifiable Natural Person	Anyone 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 one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
Data Controller	A natural or legal person, Public Authority, Agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data.
Data Subject	A natural person whose personal data is processed by a controller or processor.
Process, Processing	Any operation performed on Personal Data, whether or not by automated means, including collection, use, storing, making available, deletion etc.
Data Protection	The process of safeguarding Personal Data from unauthorised or unlawful disclosure, access, alteration, processing, transfer or destruction.
Data Protection Authority	An independent Public Authority responsible for monitoring the application of the relevant Data Protection regulation set forth in national law. (Information Commissioner's Office).

Data Processors	The entity that processes data on behalf of the data controller.
Consent	Freely given, specific, informed and explicit consent of the Data Subject by statement or action signifying agreement to the processing of their personal data.
Special categories of data	Personal Data pertaining to or revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership; data concerning health or sex life and sexual orientation; genetic data or biometric data.
Third Country	Any country not recognised as having an adequate level of legal protection for the rights and freedoms of Data Subjects in relation to the Processing of Personal Data.
Personal Data Breach	A breach of security leading to the accidental or unlawful access to destruction, misuse, loss, alteration, unauthorised disclosure of Personal Data.
Encryption	Personal data that is protected through technological measures to ensure that the data is only accessible / readable by those with specified access.
Pseudonymisation	Data amended in such a way that no individuals can be identified from the data (whether directly or indirectly) without the use of additional data.
Anonymisation	Data amended in such a way that no individuals can be identified from the data (whether directly or indirectly) by any means or by any person.

4. Personal Data

In order for us to process orders, administer your account, provide the goods and services and meet all contractual obligations, the following information might be requested:

- Contact name
- Job title
- Company name
- Business telephone number
- Business email address
- Mobile telephone number
- Bank account information (when applicable)
- Home address (when applicable)
- Date of birth (when applicable)

This information is gathered by in-person request and we shall only collect the data necessary to provide the goods or services, or such as is required for security screening in the case of new employees. We do not collect special category data.

5. How we may use your personal data

Hound Security Limited 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. We are required to retain information in accordance with the law and how long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs. In order for us to provide the services we need to collect personal data for correspondence purposes and/or detailed service provision. 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. We process your information for the purpose of delivering the goods and services, in the legitimate interest of Hound Security Limited and its clients and may use the information to contact you in order to provide the goods and/or services.

Personal information which you supply to us may be used in a number of ways, for example:

- To set up your account and process orders.
- For continuing administration of your account and all goods and services provided.

6. Will my personal data be shared with anyone else?

We may pass your personal data on to third-party service providers contracted to Hound Security Limited 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 our procedures. If there is a requirement for sensitive personal data to be passed onto a third party we will only do so once we have obtained your consent, unless we are legally required otherwise.

7. Under what circumstances will Hound Security Limited 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. We will contact you for correspondence purposes and/or detailed service provision. In terms of being contacted for marketing purposes Hound Security Limited would contact you for additional consent.

8. Retention Period

Hound Security Limited will process personal data for the duration of the contract and such time afterwards as industry standards require and will store the personal data in accordance with our Retention Period documented information.

9. 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:

- You have the right to know exactly how your personal data will be processed by us. We commit to processing your data fairly, lawfully and transparently, details of which are set out in this Privacy Notice.
- Right of access – you have the right to request access to the Personal Data we hold about you.
- Right of rectification – you have the right to request changes to data we hold about you that is inaccurate or incomplete.
- Right to be forgotten – you have the right to request erasure of your data or the right to be forgotten completely, where there is no legitimate reason for your data to continue to be processed. Page 4 of 5 GDPRREC3.1 Classification: Public Issued Date: 15/01/18 V1
- Right to restriction of processing – you have the right to request that processing of your data is restricted so that data remains stored but is not further processed by us.
- 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 your data being processed, if the processing is for a legitimate interest without compelling grounds, or for direct marketing.
- Right to judicial review: in the event that we were to refuse 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 3.9 below. All of the above requests will be forwarded on should there be a third party involved (as stated in 3.4.1 above) in the processing of your personal data.

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 write to us at Hound Security Limited, 10 The Paddocks, Codicote, Hitchin, SG4 8YX or email us at info@houndsecurity.co.uk

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.

10. Can I find out the personal data that Hound Security Limited holds about me?

At your request, Hound Security Limited can confirm what information we hold about you and how it is processed. If we do 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
- Contact details of the data protection office, 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 Hound Security Limited 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. Page 5 of 5 GDPRREC3.1 Classification: Public Issued Date: 15/01/18 V1
- 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.

11. What forms of Identification will I need to access this?

Hound Security Limited accepts the following forms of ID when information on your personal data is requested:

- Passport
- Drivers Licence
- Birth Certificate
- Utility Bill (Dated within the last three months)

12. How to contact us

Hound Security can be contacted in the following ways:

- **Post:** Hound Security Limited, 10 The Paddocks, Codicote, Hitchin, SG4 8YX
- **Email:** info@houndsecurity.co.uk
- **Phone:** 0800 689 3591