



Vigilant Facilities

DATA PROTECTION & PRIVACY POLICY

1. Purpose

The purpose of this GDPR Policy is to ensure that our small security company complies with the General Data Protection Regulation (GDPR) and the UK Data Protection Act 2018. This policy outlines how we collect, store, process, and protect personal data, ensuring that we handle personal information lawfully, transparently, and securely.

2. Scope

This policy applies to all employees, contractors, and third parties who process personal data on behalf of the company. It covers all personal data that the company handles, whether relating to employees, clients, suppliers, or other stakeholders.

3. Definitions

- **Personal Data:** Any information relating to an identified or identifiable natural person (data subject). This includes names, contact details, identification numbers, location data, and any other information that can be linked to an individual.
- **Processing:** Any operation or set of operations performed on personal data, such as collection, recording, storage, alteration, retrieval, consultation, use, disclosure, dissemination, erasure, or destruction.
- **Data Subject:** The individual to whom the personal data relates.
- **Data Controller:** The organization (our company) that determines the purposes and means of processing personal data.
- **Data Processor:** Any person or organization that processes data on behalf of the data controller.
- **Data Protection Officer (DPO):** The person responsible for overseeing data protection strategy and implementation within the company. For our small company, this role may be assumed by our managing director.

4. Data Protection Principles

We adhere to the following principles for processing personal data:

1. **Lawfulness, Fairness, and Transparency:** Personal data shall be processed lawfully, fairly, and in a transparent manner.
2. **Purpose Limitation:** Personal data shall be collected for specified, explicit, and legitimate purposes and not further processed in a manner incompatible with those purposes.



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3. **Data Minimization:** Personal data shall be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.
4. **Accuracy:** Personal data shall be accurate and, where necessary, kept up to date. Inaccurate data shall be erased or rectified without delay.
5. **Storage Limitation:** Personal data shall be kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the data is processed.
6. **Integrity and Confidentiality:** Personal data shall be processed in a manner that ensures appropriate security, including protection against unauthorized or unlawful processing, accidental loss, destruction, or damage.

5. Legal Bases for Processing

We will only process personal data where we have a legal basis to do so. The legal bases include:

- **Consent:** The data subject has given explicit consent for processing their data for a specific purpose.
- **Contractual Necessity:** Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract.
- **Legal Obligation:** Processing is necessary for compliance with a legal obligation to which the company is subject.
- **Legitimate Interests:** Processing is necessary for the purposes of legitimate interests pursued by the company or a third party, provided these interests are not overridden by the data subject's rights.

6. Rights of Data Subjects

Data subjects have the following rights under GDPR:

- **Right to be Informed:** Data subjects have the right to be informed about the collection and use of their personal data.
- **Right of Access:** Data subjects have the right to access their personal data and receive a copy of it.
- **Right to Rectification:** Data subjects have the right to have inaccurate personal data corrected or completed if it is incomplete.
- **Right to Erasure (Right to be Forgotten):** Data subjects have the right to request the deletion or removal of their personal data where there is no compelling reason for its continued processing.
- **Right to Restrict Processing:** Data subjects have the right to request the restriction or suppression of their personal data under certain circumstances.
- **Right to Data Portability:** Data subjects have the right to obtain and reuse their personal data for their own purposes across different services.



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- **Right to Object:** Data subjects have the right to object to the processing of their personal data in certain circumstances, including for direct marketing purposes.
- **Rights related to Automated Decision-Making and Profiling:** Data subjects have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal or similarly significant effects.

7. Data Security

We are committed to ensuring the security of personal data. We will implement appropriate technical and organizational measures to protect personal data from unauthorized access, loss, alteration, or destruction. These measures include:

- **Access Controls:** Restricting access to personal data to authorized personnel only.
- **Encryption:** Using encryption technologies to protect personal data during storage and transmission.
- **Regular Audits:** Conducting regular audits and assessments of data security practices to identify and address vulnerabilities.
- **Data Breach Response:** Implementing a data breach response plan to ensure that any data breaches are managed effectively, and affected data subjects are informed promptly in accordance with legal requirements.

8. Data Retention

We will retain personal data only for as long as necessary to fulfill the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements. Once personal data is no longer needed, it will be securely deleted or anonymized.

9. Data Sharing

We will only share personal data with third parties when there is a legitimate reason to do so and where we have ensured that the third party provides adequate protection for the data. This includes:

- **Service Providers:** Sharing data with third-party service providers who perform functions on our behalf, such as IT support, payroll processing, or legal advice.
- **Legal Obligations:** Sharing data to comply with legal obligations, such as responding to a court order or government request.



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- **Client Requirements:** Sharing data with clients when required for the performance of a security contract, ensuring that any such data sharing is compliant with GDPR.

10. Data Breaches

In the event of a data breach, we will:

- **Assess the Risk:** Determine the severity of the breach and its potential impact on data subjects.
- **Report to the ICO:** Notify the Information Commissioner's Office (ICO) within 72 hours if the breach is likely to result in a risk to the rights and freedoms of data subjects.
- **Inform Data Subjects:** Notify affected data subjects without undue delay if the breach is likely to result in a high risk to their rights and freedoms.
- **Mitigate the Impact:** Take immediate steps to contain and mitigate the effects of the breach and prevent future incidents.

11. Employee Responsibilities

All employees are responsible for:

- **Understanding and Complying:** Familiarizing themselves with this policy and ensuring compliance in their day-to-day work.
- **Data Handling:** Handling personal data responsibly and securely in line with this policy and company procedures.
- **Reporting Issues:** Reporting any concerns about data protection, potential breaches, or security risks to the designated Data Protection Officer or management.

12. Training

We will provide regular training to all employees on GDPR compliance, data protection principles, and the company's data handling procedures. New employees will receive GDPR training as part of their induction.

13. Monitoring and Review

This policy will be reviewed annually, or sooner if necessary, to ensure it remains compliant with legal requirements and reflects current best practices. Any updates to the policy will be communicated to all employees.



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14. Conclusion

Our security company is committed to protecting the personal data of all individuals we interact with. By adhering to this GDPR Policy, we ensure that personal data is handled responsibly, securely, and in compliance with all relevant legal requirements.

This GDPR Policy outlines our commitment to data protection and provides a framework for ensuring that personal data is handled in accordance with GDPR requirements.

M J Khan

Managing Director

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