

## Privacy Policy

Gryphon Safety and Security, are committed to protecting your privacy and promise to collect, process and share your data safely and securely when you use us for employment opportunities, training or consultancy. Our Privacy Policy tells you how we do this and what your rights are. Any personal data processed in line with our Privacy Policy is controlled by us, as the data controller. **Our Privacy Promise**

**Transparency** – We will always tell you what data we’re collecting about you and how we use it. We only share your data with trusted partners and will never sell your data.

**Secure** – We are committed to always follow industry best practices to ensure your data is stored safely and securely. We protect the confidentiality, accuracy and availability of the information we collect about you.

**Control** – We will always give you control over the marketing (i.e. offers of training and employment) you receive from us. You can choose the types of messages you receive and whether you want to stop receiving marketing communications.

### Information we collect about you:

- Personal and contact information when you apply for a place on one of our courses, or employment opportunities (or update the information held from a previous application), including your name, address, email address, telephone number(s), social media username(s), title, date of birth, gender and security question answers, for example town of birth and mother’s maiden name. We may collect some of that contact information when you interact with us including via our office administration team.
- Details (and copies) of your communications and interactions with us via our company office including by email, telephone (voice recordings), post and online via social media channels.
- Copies of documents you provide to prove your identity (including driving licence and passport) when you are applying for employment, consultancy packages, or a place on a training course, or where there is a legal reason to request this from you.
- Transaction details including payments from you for training courses, equipment and payments to you for work carried out.
- Your financial information including your bank account details (which are sent to BACS) when payed by direct debit.
- We may also receive personal data directly from you or from various third parties and public sources, including social media channels (if you interact with us through those channels), or other third parties including credit reference agencies.

### How and why we use your personal data:

In the table below, we set out all of the ways we use your personal data, and why. We have also identified what our legitimate interests are where appropriate.

It is sometimes necessary for us to process your personal data in order to enter into a contract with you, or to satisfy a contractual requirement (referred to as ‘performance of a contract with you’ below), or to comply with a statutory requirement. In those circumstances,

if you do not provide the personal data we require, we will be unable to provide our services to you.

**Table of how we use your data and why:**

	How we use your personal data:	Why we use your personal data:
Application for training or employment	<p>We use your personal and contact information to register you as a learner.</p> <p>We collect financial information if you use a payment card or set up paying by direct debit.</p>	Necessary for the performance of a contract with you.
Eligibility	<p>The personal details you provide at the time of application and, where relevant, any identity documents you have provided to check whether you are eligible for training or employment.</p> <p>For example, when your application is received we have an automated process in place to verify that the details you provide are correct and to verify you are over 16, and that you are a UK or Isle of Man resident.</p>	Necessary for compliance with a legal obligation.
Verification	We may require copies of documents to verify your identity where we are required by law to provide assistance, or in order to comply with any request you may make regarding training or employment.	Necessary for compliance with a legal obligation.
Attending our training courses	We use the personal and contact information provided by you and the transaction details about your purchases, to provide other services to you.	Necessary for the performance of a contract with you.
Managing your data	We use your personal and contact information, financial information, and transaction details about your purchases, to manage your account, to contact you regarding training, and to pay for work.	Necessary for the performance of a contract with you.

<p>Communicating with you</p>	<p>We use the personal and contact information provided by you, copies of your communications with us and, in some circumstances, transaction details, to manage our relationship with you.</p> <p>For example:</p> <p>to notify you about changes to our Account Terms or Privacy Policy; to communicate with you in response to any query, request or complaint you may have including by email or telephone, and whether relating to any training that you have purchased from us or otherwise.</p>	<p>Necessary for the performance of a contract with you.</p> <p>Necessary to comply with a legal obligation.</p> <p>Necessary for our legitimate interests (to keep our records updated).</p>
<p>Staff training</p>	<p>We use copies of your communications with us (including voice recordings) in order to train our staff.</p>	<p>Necessary for our legitimate interests (to ensure that we are able to provide the best service to you).</p>
<p>Market research</p>	<p>We may use the personal and contact information you have provided to ask you to take part in market research or a survey.</p> <p>We also use the results of any surveys or market research that you undertake to improve our website, or our service.</p>	<p>Necessary for our legitimate interests (to assess and improve our service and business).</p>
<p>Technical issues</p>	<p>If you contact us about an issue we may use technical information, personal and contact information to administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).</p>	<p>Necessary for our legitimate interests (for running the business, the provision of administration and IT services, security and fraud prevention).</p>

Experience	<p>We use information about your use of our website, and (in some circumstances) your personal and contact information, and other relevant information that we receive from you or third parties, to deliver relevant website content, and other direct marketing to you, and to manage the delivery of that content.</p> <p>For example, we may display relevant notifications to you based on your use of our website.</p>	Necessary for our legitimate interests (to ensure that you are shown relevant content based on your use of our website).
Publicity	We may use your personal and limited contact information in any publicity materials provided that you have given your consent.	Your consent.
Regulatory compliance	We may use your personal and contact information, financial information, information about any transaction between you and us, information about your use of our website, or technical information, to enable us to comply with our legal and regulatory obligations, and employer protection measures.	Necessary to comply with a legal obligation.
Fraud prevention	We may use your personal and contact information, financial information, information about any transaction between you and us, information about your use of our website, or technical information, in order to undertake analysis for the purposes of identifying and dealing with any fraud or fraudulent activity.	<p>Necessary to comply with a legal obligation.</p> <p>Necessary for our legitimate interests (to ensure that transactions and interactions with us are not fraudulent).</p>

Queries	We may use your personal and contact information, financial information, information about any transaction between you and us, information about your use of our website, or technical information for the purpose of dealing with any request, complaint or query from you.	Necessary to comply with a legal obligation. Necessary for our legitimate interests (to respond to you and to deal with any request you may have).
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### How we can use your personal data for direct marketing:

We can send you marketing communications through a number of different channels. You will receive direct marketing by email if you have attended one of our training courses or have accepted paid work with us. If you have connected with us through our website and have either consented to receive such email marketing and/or have not asked us to stop sending direct marketing by email to you.

### How to opt out of direct marketing

You can opt out from receiving direct marketing communications and notifications from us at any time. There are various ways you can do this:

- To stop receiving marketing by email:
  - Email us stating that you no longer wish to receive any further marketing or notifications
- To stop receiving notifications via social media groups on your mobile device:
  - Request that the group administrator removes you from the group via email.
- Write to us

### How can I stop my personal data being used for direct marketing?

If you would like us not to use your personal data to personalise marketing to you, you can notify us of this request by emailing the office on [info@gryphonsecurity.co.uk](mailto:info@gryphonsecurity.co.uk) If you choose to stop personalised direct marketing, you will continue to receive marketing communications and notifications from us. However, they will not be personalised to you.

To stop all direct marketing (including both marketing communications/notifications and personalisation) you must opt out of both. Please note that our systems may take up to 72 hours to update after changing your preferences.

### Sharing your information with our partners

We may share your data with our partners/other agencies that we work with on a subcontractor basis.

### How we share your data with third parties:

We sometimes share the data we collect from you with the following trusted third parties:

- Banks and payment providers – to set up a direct debit/debit on your account, to pay wages to you and to obtain payment of any amounts due to us.
- Our IT system providers – in order to provide software to set up communications providers and to provide our systems to us, including for the purposes of hosting, support and software licensing.
- Marketing service providers – to allow us to send email communications (including, for example, Whatsapp, Twitter, Instagram etc.)
- Social media platforms – for the purpose of targeted advertising.
- Professional advisers including lawyers, bankers, auditors and insurers – for the purposes of providing consultancy, banking, legal, insurance and accounting services.
- Police or other such regulatory authority – as part of an investigation or otherwise for legal or regulatory purposes.
- Dispute Resolution agencies – for the purposes of dealing with any complaints.
- Credit reference agencies – for the purpose of checking the details that you have provided us with are correct and to comply with our regulatory obligations.
- Auditors – to audit our systems and transactions for the purposes of ensuring efficiency, or regulatory or contractual compliance.
- UK law enforcement agencies – for the purposes of ensuring that we comply with the law and have adequate security measures in place.
- We will disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request. We do this in order to protect our rights, property or safety of our clients, employees or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

### **How we protect your personal data:**

We have put various measures in place to protect your personal data:

- We are independently certified to a number of industry recognised standards, including ISO 9001:2015 which helps us maintain the highest levels of data security across our entire business.
- Our entire site is accessed using https rather than http, meaning that all information that is sent and received is encrypted for additional security. You can see this in the address bar of your browser.
- As described in this Privacy Policy, we may in some instances disclose your personal data to third parties. Where we do, we require that third party to have appropriate technical and organisational measures in place to protect your personal data. However, in some instances we may be compelled by law to disclose your personal data to a third party, and have limited control over how it is protected by that party.

Your personal data may be processed outside the European Economic Area (EEA) – including by staff operating outside the EEA who work for us or for one of our third parties

mentioned. That includes social media agencies for the purposes of providing relevant marketing or notifications to you.

Where your personal data is transferred outside of the EEA, we require that appropriate safeguards are in place. To find out more about the appropriate safeguards that we have in place, please [contact us](#).

#### **How long we keep your personal data:**

We will only keep your personal data 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.

At the end of that retention period, your data will either be deleted or anonymised (so that it can no longer be associated with you) for research or statistical purposes.

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 you may be entitled to ask us to delete your data: see 'Your rights' below for further information.

#### **Your rights:**

You have the right:

- to ask us not to use your personal data for direct marketing. See further information on how to do this above.
- to ask us not to process your personal data where it is processed on the basis of legitimate interests, if there are no compelling reasons for that processing;
- to request from us access to personal information held about you (see [below](#));
- to ask for the information we hold about you to be rectified if it is inaccurate or incomplete;
- to ask that we stop any consent-based processing of your personal data after you withdraw that consent;
- to ask, in certain circumstances, to delete the personal data we hold about you;
- to ask, in certain circumstances, for the processing of that information to be restricted; and
- to ask, in certain circumstances, for data portability.

#### **Contact us:**

If you have any questions about our Privacy Policy, including any requests to exercise your rights, please contact the Data Controller using the details set out below:

By post to:

**Data Controller**  
**Gryphon Event Safety and Security Limited**

**Gryphon House  
Knaresborough Drive  
GRANTHAM  
Lincolnshire  
NG31 8UP**

By email to:

[info@gryphonsecurity.co.uk](mailto:info@gryphonsecurity.co.uk)

In order to request a copy of the personal data that GESS holds about you, please send your request in writing to the Data Controller at the above address. To enable us to verify your identity and process your request, you must include all of the following information and documentation with your request:

- your full name;
- the email address registered to your account;
- a description of the data that you are requesting, including a date range;
- a copy of your current and valid photo ID (e.g. passport photo page);
- proof of your address in the form of a photocopy of a utilities or service provider bill; and
- the date of the request.

If you are unhappy with our processing of your personal data, you have the right to complain to the Information Commissioner's Office (ICO) at any time. The ICO's contact details are available here: <https://ico.org.uk/concerns/>. We would, however, appreciate the chance to deal with any concerns before you approach the ICO, so please contact the Data Controller by email in the first instance.

### **Changes to this Privacy Policy**

Any changes that we may make to our Privacy Policy in the future will be posted on our website. Where appropriate, we will notify you of the changes when you next visit our website.

This Privacy Policy was last updated on 22<sup>nd</sup> May 2018.