



This privacy and cookie policy sets out how Advanced Access Ltd collects, uses and protects personal data that you provide to us. In accordance with the General Data Protection Regulation (GDPR) it also sets out the legal basis on which such personal data is processed. It should be read in conjunction with our Website Privacy & Cookie notice dated May 2018.

## **Processing on the legal basis of 'legitimate interests' (Article 6.1(f) of the GDPR)**

In simple terms the legal basis of 'legitimate interests' means that the processing is necessary to provide the services Advanced Access Ltd provides as a specialist supplier of Access Control, CCTV, Door Entry, Security Systems and associated accessories to UK based installers.

In order to do this we may collect and keep a record of personal data about you from our telephone conversations, emails and written communications. When you contact us, you may be required to provide certain information such as your name, company name, telephone number and email address. We may also ask you for additional information such as your mobile phone number, address, or credit card details as required under the circumstances. Please let us know if any of your personal data changes or is inaccurate so that we may keep our records up-to-date.

We may use the personal data we collect from you in various ways, including to:

- to provide you with a quotation
- to process any orders placed by you
- to communicate with you
- for maintaining our internal records
- to improve the quality of our service and
- to perform analytics from Google\* for website performance, your interest in specific product types, customise our website in accordance with your interests or special offers for instance.

\*Please note that Google analytics terms do not allow for data that may identify someone to be passed to them. See the Data Confidentiality section:

<https://support.google.com/analytics/answer/6004245?hl=en-GB> although you can still opt-out at. Further details can be found at <https://support.google.com/analytics/answer/6004245?hl=en-GB>

Your personal data may be shared with a third party under events that for example might include;

- we were to sell or buy any business or assets,
- if Advanced Access Ltd and its assets were acquired by a third party
- if we are under a legal duty
- if we needed to enforce our terms and conditions of trade
- any other such agreements which may include fraud protection or credit risk reduction.

We do not share your personal data with any third parties for any marketing purpose.

We use email monitoring and blocking software via a third party. Emails sent to us, including attachments, may be monitored and used by us and our third party for monitoring compliance and managing security in line with our policies.

We produce our own e-newsletters/e-shots and send these via a specialised third party email marketing platform. We use their tools and industry standard statistical tools around email opening and clicks to help us monitor and improve on our e-newsletters/shots.

### **Job Applicants, current and former employees**

The personal data processing described in this section is on the legal basis of 'legitimate interests' (Article 6.1(f) of the GDPR).

When individuals apply to work at Advanced Access Limited, we will only use the information they supply to us to process their application and to monitor our recruitment activities. Where we want to disclose information to a third party for example to take up a reference we will inform them beforehand.

Personal information will be held on unsuccessful candidates for up to a period of 3 months after the recruitment campaign has been completed and then it will be securely destroyed or deleted. We consider 3 months a reasonable period of retention in case of any queries arising from the recruitment campaign.

Once someone has taken up a position of employment a file will be set up relating to the employment. This file will be kept secure and will only be used for the purposes directly relevant to the individual's employment. Once employment has ended information will be deleted and/or destroyed as necessary once the purpose for its collection expires and all legal requirements have been met. Specific information will be retained for longer as necessary for legal defence. Further details are available by emailing [gdpr@advanced-access.co.uk](mailto:gdpr@advanced-access.co.uk) or by writing to the Data Protection Officer at the address at the end of this document.

### **Processing on the legal basis of 'consent' (Article 6.1(a) of the GDPR)**

In certain circumstances we may ask for your specific permission ('consent') before processing your personal data. In these circumstances we will provide notice of the exact nature of the processing and give you a genuine choice to accept or refuse.

Should you choose to accept ('consent') to such processing you then have the right to withdraw your 'consent' at any time by informing us that you no longer give permission for your personal data to be used in this way.

If you have previously agreed to us using your personal contact information for direct marketing purposes you may change your mind at any time by clicking the unsubscribe box in the email footer and following the link or by emailing us at [gdpr@advanced-access.co.uk](mailto:gdpr@advanced-access.co.uk) or by writing to the Data Protection Officer at the address at the end of this document.

## **Processing on the legal basis of 'necessary for contract' (Article 6.1(b) of the GDPR)**

In simple terms the legal basis of 'necessary for contract' means that the processing is necessary to fulfil the contract that we have agreed or need to enter into with you.

Processing based on this basis includes

- Name and address for delivery of goods/services
- Contact details for communications purposes
- Payment details for goods/services
- Financial details for credit scoring

## **Retention of personal data**

Unless there are overriding legal requirements, we retain your personal data only for as long as necessary to:

- Complete the service/s requested
- Perform our legal obligation by retaining minimal information on a suppression list to maintain your contact preferences

## **Keeping your personal data secure**

All information we collect about you will be used and protected by us in accordance with current data protection law and this Privacy Notice.

We are committed to ensuring that your information is kept secure. In order to prevent unauthorised access or disclosure we have put in place appropriate technical and organisational measures to safeguard personal data from loss, misuse, unauthorised access, disclosure, alteration, damage or destruction.

## **Cookies**

In respect of data collected from our website, we use standard technology called 'cookies'. Cookies are small pieces of information that are stored by your browser on your computer's hard drive. We need this information to identify you and to store information about the products you view between visits. This helps us to improve our service to you. Although most browsers automatically accept cookies you can usually change your browser to prevent cookies being stored. If you do turn cookies off, however, this may limit the service that we are able to provide to you.

Advice on how to control cookies can be found at <https://www.aboutcookies.org/> or <http://www.allaboutcookies.org/>

## **Personal data transfers**

We do not transfer the personal data we collect to any other entity outside of the EEA.

## **Your data protection rights**

Under GDPR you have certain rights with regards to the processing of your personal data. If you would like to exercise any of these rights or need further information please email [gdpr@advanced-access.co.uk](mailto:gdpr@advanced-access.co.uk) or write to the Data protection officer, at the address at the end of this document.

These rights are summarised below.

### **Right of access**

You may request details of personal data that we hold about you including:

- a description of the personal data, the purposes for which it is being processed, whom it may be shared with and how long it is kept for
- information on your rights of rectification, erasure, restriction objection and portability as described below
- existence of automated decision making where relevant
- transfer safeguards where relevant

You may request a copy of the information held about you by contacting us with your request either by emailing [gdpr@advanced-access.co.uk](mailto:gdpr@advanced-access.co.uk) or by using the contact form on the website or by writing to the Data protection officer at the address at the end of this document. This may incur a charge within the limits allowed by the UK Data Protection Act.

### **Right of rectification**

You have the right to have inaccurate personal data rectified without delay. If you believe that any information we are holding on you is incorrect or incomplete, please write to us at the above address or email us at [gdpr@advanced-access.co.uk](mailto:gdpr@advanced-access.co.uk).

### **Right to erasure**

Under some circumstances you have the right to request the erasure of your personal data without undue delay.

Examples

- Withdrawal of consent where consent was basis of collection
- No longer necessary for purposes collected
- No overriding 'legitimate interest' grounds

### **Right of restriction**

You have the right to ask us to restrict the processing of your personal information under the following circumstances

- Accuracy is contested
- Processing is unlawful but you oppose deletion and request restriction instead
- Your personal information is no longer needed by us but you require it to be kept for establishment, exercise or defence of legal claims
- Pending a right to object action (see below)

## **Right to object**

You have the right to object to processing of your personal information on grounds relating to your particular situation or circumstances.

You have the right to object to direct marketing.

## **Right to portability**

You have the right to have your personal data that we have collected on the legal basis of 'consent' transferred to another entity in a machine-readable format.

## **Right to lodge a complaint with a Supervisory Authority**

You have a right to lodge a complaint with the Supervisory Authority in the country of your place of residence or work. The Supervisory Authority in the UK is the Information Commissioner's Office (ICO).

## **Further information**

This site and services offered here are targeted at adults and are not intended for children under the age of 13 and we do not knowingly collect information from children under 13.

You can write to us at Advanced Access Limited, Unit 1B Spinney View, Stone Circle Road, Round Spinney, Northampton NN3 8RF

We may change this policy from time to time by updating this page. This policy is effective from May 2018.