

# Privacy Policy

This policy applies to all prospective applicants, Customers, Sub-contractors & Suppliers, Website User and the owner and provider of this website SECOM Plc.

SECOM Plc takes the privacy of your information very seriously and this policy outlines our conduct of how we collect and use the Data that is provided.

This Policy does not cover companies, services or applications that are not owned or controlled by SECOM Plc, and you should refer to the Privacy Notice/Policy of any such third party

**Please read the policy carefully.**

## 1. Definitions and interpretation

In this privacy policy, the following definitions are used.

**Data:** Collectively all information that is provided to SECOM Plc. This definition incorporates, where applicable, the definitions provided in GDPR

**EEA** SECOM Plc may transfer data outside the UK and EEA, and that these transfers are protected by appropriate safeguards, such as Standard Contractual Clauses or through the UK's new "data protection test" for adequacy.

**SECOM Plc** A company incorporated in England Wales with registered number 2585807 whose registered office is: Secom House 52 Godstone Road Kenley, Surrey, CR8 5JF

**UK & EU Cookie Law** The Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011 While the UK has left the EU, it retained and adapted many EU laws, including those related to data protection and privacy. PECR continues to be relevant and is enforced in the UK. It's important to note that PECR works alongside the UK GDPR (General Data Protection Regulation) and the Data Protection Act 2018. Organizations need to comply with both PECR and the UK GDPR when engaging in electronic communications activities.

**Third Party** Any third party that accesses the Website and is not either (i) employed by SECOM Plc and acting during their employment of (ii) engaged as a consultant or otherwise providing services to SECOM Plc and accessing the Website in connection with the provision of such services

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## **Data Sharing**

### **GDS**

Government Digital Service is only accessed by authorised people and our suppliers to; improve the site by monitoring how you use it; gather feedback to improve our services e.g. email alerts; respond to any feedback received and requested; send email alerts to users who request them; allow you to access government services and make transactions; provide you with information about local services if required.

### **Website**

The website that you are currently using, [www.secom.plc.uk](http://www.secom.plc.uk), and any sub-domains of this site unless expressly excluded by their own terms and conditions.

### **Cookies**

A small text file placed on your computer by this Website when you visit certain parts of the Website and/or when you use certain features of the Website. Details of the cookies used by this Website are set out in the clause below (Cookies).

In this policy, unless the context requires a different interpretation:

- a) the singular includes the plural and vice versa
- b) references to sub-clauses, clauses, schedules or appendices are to sub-clauses, schedules or appendices of this privacy policy.
- c) a reference to a person includes firms, companies, government entities, trusts and partnerships.
- d) “including” is understood to mean “including without limitation”.
- e) reference to any statutory provision includes any modification or amendment of it.
- f) the headings and sub-headings do not form part of this privacy policy.

## **2. General**

SECOM Plc has appointed a Data Protection Officer (DPO) who is responsible for advising on and monitoring our compliance with data protection laws. The DPO is your primary point of contact for all GDPR-related enquiries, including Subject Access Requests, Erasure requests, and general questions.

The GDPR Committee supports the DPO and sets company policy on GDPR compliance.

You can contact our DPO at: Head of Compliance & Training via [GDPR@secom.plc.uk](mailto:GDPR@secom.plc.uk)

### **GDPR Committee Members**

The GDPR Committee consist of members with relevant experience in the field of corporate governance/risk, business management and IT security the members are.

- Head of Compliance and Training
- Health & Safety Manager
- Human Resources Manager
- Financial Director
- General Manager IT and Infrastructure

Any questions contact:

### **Head of Compliance**

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Any changes we make to our privacy policy in the future will be posted on SECOM Plc webpage [www.secom.plc.uk](http://www.secom.plc.uk) and, where appropriate, notified to you electronically. Please check our website frequently to see any updates or changes to our privacy policy.

### 3. Scope

The policy outlines SECOM Plc commitment to protect personal information. It is equally important for SECOM Plc to be compliant and by doing so we have adopted regulatory, statutory and industry guidelines to manage all personal data securely.

. When you submit personal data to SECOM Plc, we will process it on a specific, lawful basis. These legal bases are outlined in detail in the 'Legal Basis for Processing' section of this policy. We will only process your information:

- In the context of SECOM Plc activities and for the purposes for which it was provided.
- To actively monitor the behavior of individuals where necessary for security or service provision.
- For the provision or offer of services to the individual.

SECOM Plc are responsible for protecting your personal data at all times, this is done by.

- Implementing policies and procedures
- Appointing a company Data Protection Officer (DPO). . to deal with all GDPR enquires
- Providing a clear, transparent and legitimate interests for processing your data
- Adhering to legal obligations when processing your data
- Giving you the opportunity to either request or delete your data
- Regular compliance/assurance checks are conducted
- Ensuring all relevant staff are trained

### 4. Data Collected

In accordance with SECOM Plc policy, information that is collated consist of both general and special categorised data, this may include but not limited to the following.

#### *General Categories*

- a) Name
- b) Date of Birth
- c) Email Address
- d) Telephone Numbers
- e) Address
- f) Feedback and Complaints
- g) Application for employment

#### *Special Categories*

- h) Biometrics – CCTV Images and Recording
- i) Health – Job specific

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## 5. Our Use of Data and Data Retention

For purposes of the General Data Protection Regulations (GDPR), SECOM Plc is the “data controller”.

We will retain any Data that you have provided to SECOM Plc only for as long as is necessary to fulfill the purposes for which it was collected, or to comply with our legal and regulatory obligations. The following table provides the minimum retention periods for specific data types, with the purpose for retention listed

Data Type	Retention Period	Reason for Retention
Subcontractor Records	3 years	To meet contractual and legal obligations.
Head Office Admin	3 years	For internal record-keeping and business purposes.
Finance	7 years	To comply with UK tax and accounting laws.
Business Systems	Minimum 2 years	For ongoing service provision and historical reference
CCTV/ Call Recordings	Minimum 12 months	For security, quality assurance, and legal claims.

Unless we are obliged or permitted by law to do so, and subject to any third-party disclosures specifically set out in this policy, your Data will not be disclosed to third parties. This includes our affiliates and/ or other companies within our group.

All personal Data is stored securely in accordance with the principles of GDPR. For more details on security see the clause below (Security).

Any or all the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our website. Specifically, Data may be used by us for the following reasons:

- a) internal record keeping
- b) improvement of our products/services
- c) contact for marketing or market research purposes which may be done using email, telephone, fax or mail. Such information may be used to customise or update the Website
- d) financial documents and statements such as invoices, credit notes etc...
- e) compelled by the court of law
- f) creating customer files
- g) third party suppliers carrying out specific functions on behalf of SECOM Plc
- h) authorising access control to various systems
- i) tax and payroll purpose

in each case, this is in accordance with this privacy policy.

## 6. Data Storage

All information provided are stored on SECOM Plc servers at Kenley and backed up to our secure inhouse servers in Hainault and Leeds.

Unfortunately, transmission of information via internet is not completely secure. SECOM Plc will do their best to protect your personal data, we cannot guarantee the security of your data transmitted to our website: any transmission is at your own risk. However, once SECOM Plc has received your information, we will use strict procedures and security protocols to try and prevent unauthorised access.

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## 7. Legal Basis for Processing

SECOM Plc relies on the following legal grounds for collecting and using your personal data. We will not use your data for any purpose other than those listed below, unless we have a new, valid legal basis to do so.

Purpose	Legal Basis
Contacting prospective customers, handling complaints, and service ratings.	Legitimate Interest: It is our legitimate interest to respond to your feedback, improve our services, and provide quotes. We have balanced this interest against your privacy rights.
Processing customer information to provide a service.	Contractual Necessity: This use is necessary for us to perform our contract with you or to take steps to enter into a contract with you.
Complying with regulatory obligations (e.g., providing data to government officials or courts).	Legal Obligation: We are legally required to provide this information in response to valid requests from regulatory bodies.
Issuing invoices and statements.	Contractual and Legal Obligation: It is our contractual obligation to manage financial transactions and our legal obligation to retain these records.
Marketing communications (where you have opted in).	Consent: We will only send you marketing communications where you have given us explicit, clear, and unambiguous consent to do so. You have the right to withdraw your consent at any time.
Running and managing the pre-employment process.	Legitimate Interest and Legal Obligation: It is our legitimate interest to assess candidates for a role. In some cases, we may have a legal obligation to process certain data (e.g., health data for job-specific safety checks).
Processing for crime prevention or safeguarding.	Recognized Legitimate Interest: This processing is based on a 'recognized legitimate interest' under the Data (Use and Access) Act 2025. This allows us to process data for crime prevention or safeguarding purposes without needing a full balancing test.

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## 8. Sharing Data

SECOM Plc shares personal data with trusted third parties to provide our services and to fulfill our legal obligations. We ensure that all data is handled securely and only accessed by approved employees and third-party suppliers. The table below outlines who we share data with and for what purpose

### Recipients/Categories

Data Centre

Marketing & Sales Force

Government (Tax office, Courts)

Finance, Auditors, Credit Control and Advisors

Employees

Engineers and Subcontractors

Credit Referencing / DBS

### Purpose & Legal Basis

**Daily backup:** Contractual Necessity and Legitimate Interest (to ensure business continuity and data security).

**Providing product and service updates:** Legitimate Interest (to market our services to existing clients).

**Compelled to comply with a legal request:** Legal Obligation.

**Audits and financial management:** Legal Obligation and Legitimate Interest.

**Staff Vetting/Security Checks:** Legal Obligation and Legitimate Interest (to ensure the security and integrity of our services & Contractual Necessity and Legitimate Interest).

## 9. Confidentiality

SECOM Plc acknowledges that the information that is provided may be confidential and to ensure that your data is protected SECOM Plc will maintain the confidentiality of your data and information in accordance with all applicable laws.

## 10.Changes of business ownership and control

SECOM Plc may, from time to time, expand or reduce our business and this may involve the sale and/ or the transfer of control of all or part of SECOM Plc. Data provided by User will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this privacy policy, be permitted to use the Data for the purposes for which it was originally supplied to us.

We may also disclose Data to a prospective purchaser of our business or any part of it.

In the above instances, we will take steps with the aim of ensuring your privacy is protected.

## 11.Controlling use of your Data

Wherever you are required to submit Data, you will be given options to restrict our use of that Data. This may include the following:

- Use of Data for direct marketing purposes; and
- Sharing Data with third parties.

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## 12. Functionally of the Website

To use all features and functions available on the Website, you may be required to submit certain Data.

You may restrict your internet browser's use of Cookies. For more information see the clause below (Cookies)

## 13. Third party websites and services

SECOM Plc may, from time to time, employ the services of other parties for dealing with certain processes necessary for the operation of the Website. The providers of such services do not have access to certain personal Data provided by Users of this Website.

## 14. Links to other websites

This Website may, from time to time provide links to other websites. SECOM Plc has no control over such websites and are not responsible for the contents of these websites. This privacy policy does not extend to your use of websites.

When accessing GOV.UK, we may receive information from the other website/s. SECOM Plc will not use the data provided and you are advised to read the privacy policy presented on the website before continuing.

## 15. Cookies

This Website may place and access certain Cookies on your computer, SECOM Plc uses Cookies to improve your experience of using the Website and to improve our range of services. SECOM Plc has carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.

This Website may place and access certain Cookies on your computer to improve your user experience and our services. We have carefully chosen these Cookies and have taken steps to ensure your privacy is protected.

**Under the Data (Use and Access) Act 2025, we can use certain cookies for purposes like improving our service through statistical analysis or for website security without your explicit consent.** However, for these cookies, we will provide clear and comprehensive information about them and give you a simple and free way to opt out.

For other types of cookies, such as those used for marketing, we will present you with a pop-up requesting your **explicit consent**. You may, if you wish, deny consent to the placing of these Cookies; however, certain features of the Website may not function fully

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This Website may place the following Cookies:

Type of Cookie	Purpose
<i>Strictly necessary cookies</i>	These cookies are essential in order for you to move around the website and use its features, for example such as accessing secure areas of the website. talk to Marketing.
<i>Analytical/performance cookies</i>	They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
<i>Functionality cookies</i>	These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
<i>Targeting cookies</i>	These cookies record your visit to our website, the pages you have visited and the links you have followed. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third-party advertisers.

You can choose to enable or disable Cookies in your internet browser. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser.

You can choose to delete Cookies at any time; however, you may lose any information that enables you to access the Website more quickly and efficiently including, but not limited to, personalisation settings.

It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.

## 16.Security

Data security is of great importance to SECOM Plc and to protect you Data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure Data collection via this Website.

If password access is required for certain parts of the Website, you are responsible for keeping this password confidential.

We endeavour to do our best to protect your personal Data. However, transmission of information over the internet is not entirely secure and it's done at your own risk. We cannot ensure the security of your Data transmitted to the Website.

## 17.Your Rights and Complaints

Subject Access Requests (SARs) You have the right to request a copy of any of your personal data held by SECOM Plc. This is known as a Subject Access Request (SAR). Your request can be made in writing to our Data Protection Officer and may include, but is not limited to, the following information:

- Alarm Handling Information

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- Copies of emails and letters
- Statements
- CCTV footage
- Call recordings
- DBS Reports

SECOM Plc will conduct a reasonable and proportionate search for the requested data and will complete the process within one month (31 Days) of receiving your request. This is a non-chargeable service, but we reserve the right to charge a reasonable fee if your request is manifestly unfounded, excessive, or repetitive. We will notify you of any such fees in advance.

The one-month timeframe may be paused ("stopped the clock") if we need to contact you for further information to clarify your request. We will inform you if this happens.

## 18. 'Right to be Forgotten'

SECOM Plc Staff, Customers, Sub-contractors & Suppliers, Website User shall have the right to obtain from the Data Protection Controller to delete personal data concerning them without undue delay.

It is the controller's obligation to erase personal data without undue delay where one of the following grounds applies:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.
- the individual withdraws consent on which the processing is based according to **Article 6 GDPR (1)** or **Article 9 GDPR (2)**, and where there is no other legal ground for the processing.
- the data subject objects to the processing pursuant to **Article 21 GDPR (1)** and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to **Article 21 GDPR (2)**
- the personal data have been unlawfully processed.
- the personal data must be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.
- the personal data have been collected in relation to the offer of information society services referred to in **Article 8 GDPR (1)**

Where the controller has made the personal data public and is obliged pursuant to section 32 to erase the personal data, the controller, shall take reasonable steps...to inform relevant data controllers which are processing the personal data that the individual has requested for deletion. This right may not apply where the processing is necessary...for the establishment, exercise or defence of legal claims.

The above will not apply to the extent that processing is necessary:

- for exercising the right of freedom of expression and information.
- for compliance with a legal obligation which requires processing by a Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

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- c) for reasons of public interest around public health in accordance with points (h) and (i) of **Article 9 GDPR (2) and (3)**.
- d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with **Article 89 GDPR (1)** in so far as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- e) for the establishment, exercise or defence of legal claims.

## 19.Complaints

**Complaints:** The Data (Use and Access) Act 2025 creates a formal right to complain directly to SECOM Plc. We will provide an electronic form to facilitate complaints. We will acknowledge your complaint within 30 days and take appropriate steps to investigate and respond without undue delay.

SECOM Plc will manage all complaints in accordance with the company Complaints Management Policy. All complaints related to personal data will be reviewed, investigated and processed by SECOM Plc Data Protection Officer (DPO).

Complaints regarding the conduct of processing personal data by Secom Plc should be in writing and forwarded to the Data Protection Officer (DPO).

Contact can be made via [GDPR@Secom.plc.uk](mailto:GDPR@Secom.plc.uk)

An investigation of the complaint will be carried out to the extent that is appropriate based on the merits of the specific case. The Data Protection Officer (DPO). . will inform the data subject of the progress and the outcome of the complaint within a reasonable period.


If the issue cannot be resolved or dissatisfied with the way SECOM Plc has handled your data, you have the rights to lodge a complaint with the Information Commission, Tel: 0303 123 1113, Website: [www.ico.org.uk](http://www.ico.org.uk) (<https://www.ico.org.uk>). However, SECOM Plc would appreciate the chance to deal with your concerns before you approach the ICO details can be found in section 2 of the policy.

## 20.General

You may not transfer any of your rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected.

## 21.Review

Formal review of this Policy will occur once a year unless deemed necessary by changes in legislation and / or need due to improved practices.



Satoru Awano

**Managing Director- SECOM PLC**

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<b>Version No</b>	<b>Amendments</b>	<b>By Whom</b>	<b>Date</b>
8	<b>Update with New MD Signature</b>	D Jones	May 2023
9	<b>New logo header added</b>	D Jones	March 2024
10	<b>Updates to definitions and Interpretations</b>	D Jones	Feb 2025
10	<b>Annual Review</b>	D Jones	Feb 025
11	<b>Changes brought by The Data (Use and Access) Act 2025</b>	D Jones	Sept 2025
11	<b>Annual Review</b>	D Jones	Feb 2026

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