



Privacy Notice

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1. This Notice

This Notice is issued by CM Security Ltd (“we”, “us” and “our”) is addressed to individuals outside our organisation with whom we interact (“you”). Defined terms used in this Notice are explained in Section (S) below.

For the purposes of this Notice, the Controller is CM Security Ltd; Registered Address: AMP House Dingwall Road Croydon CR0 2LX; Correspondence Address: DALTON HOUSE 60 Windsor Avenue, London SW192RR. This Notice covers the information practices relating to the services we offer now or in the future. Contact details are provided in Section 17 below.

This Notice may be amended or updated from time to time to reflect changes in our practices with respect to the Processing of Personal Data, or changes in applicable law.

2. Collection and generation of Personal Data

We may collect Personal Data about you from the following sources:

- Data you provide: We may obtain your Personal Data when you provide it to us (e.g., where you contact us via email or telephone, or by any other means).
- Relationship data: We may collect or obtain your Personal Data in the ordinary course of our relationship with you (e.g., if you purchase a service from us).
- Third party information: We may collect or obtain your Personal Data from third parties who provide it to us (e.g. law enforcement authorities).

We may also generate Personal Data about you, such as usernames and passwords for the services you have ordered from us; records of your interactions with us; and details of your purchase history for internal administration purposes and analysis.

3. What Personal Data do we collect?

The categories and type of Personal Data we collect and/or generate may vary depending on the services you use and your relationship with us. It may include (but is not limited to):

- Personal details: your name;
- Contact details: postal address, phone number and email address;
- Employer details: where you interact with us in your capacity as an employee, the contact information of your employer (including name, address, telephone number and email address) to the extent relevant;
- Payment details: bank account number and sort-code;
- Book-keeping records: invoice records, billing address, payment amount, payment date and records of cheques;



- Product information: account logins and passwords of the services you have ordered from us;
- IT support information: login usernames and passwords of the devices you ask us to support; and the account logins and passwords for services you have with other companies;
- Communication history: emails, recordings of phone conversations and messages transmitted via our support ticketing system;

4. Lawful basis for Processing Personal Data

In Processing your Personal Data in connection with the purposes set out in this Notice, we may rely on one or more of the following legal bases, depending on the circumstances:

- Contractual necessity: We may Process your Personal Data where the Processing is necessary in connection with any contract that you may enter into with us;
- Compliance with applicable law: We may Process your Personal Data where the Processing is required by applicable law;
- Legitimate interests: We may Process your Personal Data where we have a legitimate interest in carrying out the Processing for the purpose of managing, or operating our business, and that legitimate interest is not overridden by your interests, fundamental rights, or freedoms.

5. Sensitive Personal Data

We do not seek to collect or otherwise Process your Sensitive Personal Data.

6. Purposes for which we may Process your Personal Data

The purposes for which we may Process Personal Data, subject to applicable law, include:

- Provision of services to you: providing our services to you; and communicating with you in relation to those services;
- Communications and IT operations: management of our communications systems; operation of IT security systems; and IT security audits.
- Financial management: sales; finance; and vendor management.
- Investigations: detecting, investigating and preventing breaches of policies, and criminal offences, in accordance with applicable law.
- Legal proceedings: establishing, exercising and defending legal rights.
- Legal compliance: compliance with our legal and regulatory obligations under applicable law.
- Improving services: identifying issues with our services; planning improvements to our services; and creating new services.



7. Sharing your Personal Data with third-parties

We may share your Personal Data with:

- Third-party Controllers (organisations who provide some of the services we sell to you) who may require some of your Personal Data in order to provide these services;
- Legal and regulatory authorities, upon request, or for the purposes of reporting any actual or suspected breach of applicable law or regulation;
- Outside professional advisors (such as accountants), subject to binding contractual obligations of confidentiality;
- Third-party Processors (such as payment services providers; data centres; etc.), subject to the requirements noted below in this Section 7;
- Any relevant party, law enforcement agency or court, to the extent necessary for the establishment, exercise or defence of legal rights;
- Any relevant party for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including safeguarding against and the prevention of threats to public security; and
- Any relevant third-party acquirer(s), in the event that we sell or transfer all or any relevant portion of our business or assets (including in the event of a reorganisation, dissolution or liquidation)

If we engage a third-party Processor to Process your Personal Data, the Processor will be subject to binding contractual obligations to: (i) only Process the Personal Data in accordance with our prior written instructions; and (ii) use measures to protect the confidentiality and security of the Personal Data; together with any additional requirements under applicable law.

8. Where your Personal Data is stored

We store your data on secure servers in the European Economic Area (“EEA”). Our email Servers are located in a secure world class data centre in Berkshire

9. How we protect your Personal Data

Our Information Security Policy is shown in a separate of the same name and specifies how we have implemented appropriate technical and organisational security measures designed to protect your Personal Data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, and other unlawful or unauthorised forms of Processing, in accordance with applicable law.



10. Data accuracy

We take every reasonable step to ensure that:

- your Personal Data that we Process is accurate and, where necessary, kept up to date; and
- any of your Personal Data that we Process that you inform us is inaccurate (having regard to the purposes for which it is Processed) is erased or rectified.

11. Data minimalisation

We take every reasonable step to ensure that your Personal Data that we Process is limited to the Personal Data reasonably necessary in connection with the purposes set out in this Notice or as required to provide you services.

12. How long we keep your Personal Data

We take every reasonable step to ensure that your Personal Data is only Processed for the minimum period necessary for the purposes set out in this Notice. We will retain your information for as long as your client account is active or as needed to provide the Services.

The criteria for determining the duration for which we will keep your Personal Data are as follows: we will retain copies of your Personal Data in a form that permits identification only for as long as is necessary in connection with the purposes set out in this Notice, unless applicable law requires a longer retention period. In particular, we may retain your Personal Data for the duration of any period necessary to establish, exercise or defend any legal rights.

13. Your rights

Subject to applicable law, you may have a number of rights regarding the Processing of your Relevant Personal Data, including:

- the right not to provide your Personal Data to us (however, please note that we may be unable to provide you with the full benefit of our services if you do not provide us with your Personal Data – e.g., we may not be able to Process your orders without the necessary details);
- the right to request access to, or copies of, your Relevant Personal Data, together with information regarding the nature, Processing and disclosure of the Relevant Personal Data;
- the right to request rectification of any inaccuracies in your Relevant Personal Data;
- the right to request, on legitimate grounds:
 - erasure of your Relevant Personal Data; or
 - restriction of Processing of your Relevant Personal Data;



- the right to object, on legitimate grounds, to the Processing of your Relevant Personal Data by us or on our behalf;
- the right to have certain Relevant Personal Data transferred to another Controller, in a structured, commonly used and machine-readable format, to the extent applicable;
- where we Process your Relevant Personal Data on the basis of your consent, the right to withdraw that consent (noting that such withdrawal does not affect the lawfulness of any Processing performed prior to the date on which we receive Notice of such withdrawal, and does not prevent the Processing of your Personal Data in reliance upon any other available legal bases); and
- the right to lodge complaints with a Data Protection Authority regarding the Processing of your Relevant Personal Data by us or on our behalf.

This does not affect your statutory rights.

To exercise one or more of these rights, or to ask a question about these rights or any other provision of this Notice, or about our Processing of your Personal Data, please use the contact details provided in Section 17 below. Please note that:

- we may require proof of your identity before we can give effect to these rights; and
- where your request requires the establishment of additional facts (e.g., a determination of whether any Processing is non-compliant with applicable law) we will investigate your request reasonably promptly, before deciding what action to take.

14. Cookies and similar technologies

We do not use Cookies on our website, nor do we collect any Personal Data when you merely use our website for informational purposes i.e. you do not use our website to contact us.

15. Terms of Use

All use of services are subject to the Terms of Use published separately in a document of the same title . We recommend that you review our Terms of Use regularly, in order to review any changes we might make from time to time.



16. Contact details

If you have any comments, questions or concerns about any of the information in this Notice, or any other issues relating to the Processing of Personal Data carried out by us, or on our behalf, please contact:

Chief Information Officer
CM Security Ltd
DALTON House
60 Windsor Avenue
London SW192RR
Email: cio@cmsecurity.co.uk
Telephone: 020 3307 0370

17. Definitions

“Cookie” means a small file that is placed on your device when you visit a website (including our website). In this Notice, a reference to a “Cookie” includes analogous technologies such as web beacons and clear GIFs.

“Controller” means the entity that decides how and why Personal Data is Processed. In many jurisdictions, the Controller has primary responsibility for complying with applicable data protection laws.

“Data Protection Authority” means an independent public authority that is legally tasked with overseeing compliance with applicable data protection laws, e.g. Information Commissioner’s Office.

“Personal Data” means information that is about any individual, or from which any individual is directly or indirectly identifiable, 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 individual.

“Process”, “Processing” or “Processed” means anything that is done with any Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

“Processor” means any person or entity that Processes Personal Data on behalf of the Controller (other than employees of the Controller).

Company Registration 08164947
Dalton House 60 Windsor Avenue London SW192RR



“Relevant Personal Data” means Personal Data in respect of which we are the Controller. It expressly does not include Personal Data of which we are not the Controller.

“Sensitive Personal Data” means Personal Data about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life, any actual or alleged criminal offences or penalties, national identification number, or any other information that may be deemed to be sensitive under applicable law.