



# Privacy Notice

Version: 0.5  
Date: 11/July/19  
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## Privacy Statement Summary:

Who will use my data?	Second Eye Ltd and carefully managed third parties including our suppliers and clients.
What for?	We will store and process your data in order to allow us to provide our CCTV surveillance, monitoring, and investigation services to our clients, meet our contractual obligations, respond to law enforcement, and to run our business.
What will happen if I contact you?	If you contact us we will use your information to send you the information you have requested, contact you to discuss our services, and also send you occasional offers and other details that we think you will be interested in. This may include a range of our related products and services. If you are a supplier or other third party, we will process your data as required to manage the relationship between us.
What data will be stored?	<p>As a client we will store the personal details we need in order to provide our services to you, take payments, and manage our relationship. We will store details of enquiries, requests, contracts, and related financial/payment information as required.</p> <p>As a supplier we will store details as required to manage our relationship.</p> <p>If we collect, store, or process your data as part of providing our services to our clients, we may store video, images, audio, and other information as required to meet our commitments but always respecting your rights under all applicable regulations.</p>
What data will be shared?	We will not share your data with any third parties other than as described here. We may share your information with regulators or law enforcement organisations that requests it.
How long?	Your data will be stored only for as long as necessary and as defined in our Data Retention policy. Your details will always be stored securely and deleted in an appropriate

	way.
Who can access my data?	Access to your data is strictly controlled to ensure your privacy and meet our obligations under the GDPR.
How is my data kept secure?	We will store your data on servers which are based in the UK. Your data is not stored outside the EU. We use industry standard security protocols/technology to secure data.

We take your privacy seriously and will only use your personal information to provide the services you have requested from us and to send you information about services you may be interested in. We will never sell, share or use your personal information other than as described here and always as you would reasonably expect and in line with all application regulations.

### About This Privacy Policy

This policy sets out how we will use and share the information that you give us. This policy describes your relationship with Second Eye Ltd. The General Data Protection Regulation (GDPR) describes how organisations must collect, handle, process and store personal information. These rules apply regardless of whether data is stored electronically, on paper or other materials. To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully. GDPR is underpinned by eight important principals. These say that personal data must:

- Be processed fairly and lawfully
- Be obtained only for specific, lawful purposes
- Be adequate, relevant and not excessive
- Be accurate and kept up to date
- Not be held for any longer than is necessary
- Processed in accordance with the rights of the data subjects
- Be protected in appropriate ways
- Not be transferred outside the European Economic Area, unless that country or territory also ensures an adequate level of protection

We take these responsibilities seriously, this document describes our approach to data protection. This policy helps to protect us from data security risks, including:

- Commercial, financial, and reputational damage caused by a data breach.
- Failing to offer choice. For instance, all individuals should be free to choose how the company uses data relating to them.
- Reputational damage. For instance, the company could suffer if hackers successfully gained access to sensitive data.

- Legal action as a result of failing to meet our data protection obligations
- Any loss or damage however caused as a result of a data breach

## Who We Are And How To Contact Us

Second Eye Ltd is a CCTV surveillance, monitoring, and investigation service registered in UK and is registered with the Information Commissioner's Office. The data controller is: Jackie Dale-Jones. You can contact us in any of the following ways:

Email: [info@secondeye.co.uk](mailto:info@secondeye.co.uk)

Phone: 01244 880161

Website: [secondeye.co.uk](http://secondeye.co.uk)

Post: 1 The Green, Lodge Lane, Saughall Chester, CH1 6JP

## Who this privacy policy applies to

Processing of your data is required in order to provide our CCTV surveillance, monitoring, and investigation services to our clients. This policy applies to individuals who have shared their data with company name as either a potential customer, customer, employee, supplier or in any other capacity. This policy also applies to the data we collect, store, and process in connection with our CCTV surveillance and monitoring operations

It applies to all data that the company holds relating to identifiable individuals, even if that information technically falls outside of the GDPR. This can include:

- Names of Individuals
- Postal addresses
- Email Addresses
- Telephone numbers
- Image, audio and Video Content
- Electronic and Printed Media
- Likeness and edited images of identifiable individuals
- Individuals captured on images other than the principle subjects
- Financial information
- Identifiers appropriate to our CCTV business
- Boat registration number and other details
- Other information as required to run our business

## What this policy applies to

This section describes the lawful basis for processing your data and applies to information about

yourself that you choose to provide us with or that you allow us to collect. This includes:

- The Information you provide when you contact us in order to discuss using our services
- Information we collect about how you use the website
- Information relating to the services we offer to you and other transactions including financial and other personal information required to complete these transactions
- Information that is given and stored as part of our ongoing relationship
- Images, videos, and other media collected by us as part of operating our service
- All material [electronic / printed / other] capturing your image and likeness

We do not normally collect or process sensitive data about you, however where this is necessary we will take appropriate precautions to protect your data.

### How your information will be used

We will only use your personal data for the purposes for which we collected it and as you would reasonably expect your data to be processed and only where there is a lawful basis for such processing, for example:

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new customer	(a) Identity, (b) Contact information, (c) financial information for reference and credit vetting etc...	Performance of a contract with you, or potential contract with customers, suppliers, and other third parties
To process and deliver the products and services you request including managing payments, fees and charges, and to collect and recover money owed to us	(a) Identity, (b) Contact, (c) Financial, (d) Transaction, (e) Marketing and Communications	(a) Performance of a contract with you, (b) Necessary for our legitimate interests to recover debts owed to us, (c) Necessary to operate our business [CRM and Credit Control]
To manage our ongoing relationship with you which will include notifying you about changes to our terms, products and services, or privacy policy, to maintain our records	(a) Identity, (b) Contact, (c) Customer Profile, (d) Marketing and Communications	(a) Performance of a contract with you, (b) Necessary to comply with a legal obligation, (c) Necessary for our legitimate interests to keep our records updated and to study how customers use our products/services, (d) with your consent
To use data analytics to improve our website, services, marketing, customer relationships and experiences	(a) Technical, (b) Usage	Necessary for our legitimate interests to define types of customers for our products and services, to keep our site updated and relevant, to develop our business and to

		inform our marketing strategy
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity, (b) Contact, (c) Technical, (d) Usage, (e) Profile	Necessary for our legitimate interests to develop our products/services and grow our business
To deliver our services and run our business	(a) Identity including image, video, and audio (b) employment information, (c) other info related to our services	(a) Performance of a contract with our clients, (b) Necessary to comply with a legal obligation, (c) Necessary for our legitimate interests to operate our business, (d) with your consent

## As a Customer or Potential Customer

We may collect and process information about you, including your name and address, contact details (including email address and mobile phone number), product and service details, service history and data collected as part of any payment or financial transaction. As part of the services we provide to you, we may collect, store, and process images in various formats. We may take personal information from:

- Information that you provide to us when contacting us via our website (including your email address)
- Information that you provide to us when signing up to any distribution lists to receive correspondence from us
- Information relating to any services we provide to you

Personal data we receive will be used for the purposes it was provided, including:

- To respond to queries from you regarding our services
- To carry out our obligations arising from any contracts entered into between you and us, including the provision of services, and to respond to queries from you regarding those contracts
- To manage and administer the relationship between you and us
- To notify you about changes to our services and to otherwise communicate with you; for example, we will use your contact details in order to respond to any queries that you submit to us
- To obtain feedback from you regarding us
- Images, videos, and other media collected, stored, or processed as a result of the services we have provided to you

In accordance with your preferences, we may also use your personal information to provide you with information about services, promotions and offers that may be of interest to you. We may use your personal information in order to ascertain the services, promotions and offers that are likely to be of

particular interest to you. This document explains how you can change whether to receive this information. Please note that, even if you choose not to receive this information, we may still use your personal information to provide you with important services communications, including communications in relation to any purchases you make or services you use.

## Where we collect CCTV information

We may collect and process information about you, including video, image, and audio files. We may also process your name and address, contact details (including email address and mobile phone number), employment details, and data collected as part of any investigation. We may also collect data from other sources including but not limited to, colleagues, your employer, previous employers, social media, internet browsing and mobile phone data and other online behaviour. As part of the services we provide to you, we may collect, store, and process data in various formats.

Personal data we receive will be used for the purposes it was provided, including:

- To progress investigations on behalf of our clients
- To progress investigations on behalf of law enforcement agencies
- To carry out our obligations arising from any contracts entered into between our clients and us including the provision of services, and to respond to queries from you regarding those contracts

## How exercise your rights under GDPR

We operate in line with EU GDPR (May 2018) data protection guidelines. We respect your rights and will respond to any request for access to personal information and requests to delete, rectify, transfer, data and to stop processing. We will also advise you on how to complain to the relevant authorities, namely the Information Commissioner's Office. Any requests or objections should be made in writing to the Data Controller or you can visit our website, call, or email us to contact us to change your preferences at anytime.

## Scope of Agreement as a Client

When you contact us and by submitting your personal data as required for us to provide products and services to you, you are affirming your agreement for such information to be used in accordance with this privacy policy. You will be able to change your preferences at any time by the methods described as prescribed in this document. We may from time to time use your information for marketing, account management or relationship management purposes. The main purpose of this is to provide you with information about the services which we think may be of interest to you and/or to maintain any existing relationship we may have with you.

Where you give your consent for us to process your data, for example when you agree to us sending you marketing information or where you agree to us processing financial data, you can contact us to amend

or withdraw your consent at anytime. You can also choose to object to processing and request deletion of your data. We respect all user rights as defined in GDPR. If you have any comments or wish to complain please contact us.

You will only receive marketing communications from us if you have:

- Requested information from us or purchased services from us
- If you provided us with your details and ticked the box at the point of entry of your details for us to send you marketing communications
- You have not opted out of receiving marketing

We will get your consent before we share your personal data with any third party for marketing purposes.

### How we store and process your data

Your data will be collected stored and processed securely, where possible we store your data in the EU however we may use cloud storage options outside the EU. Where this is the case we will take reasonable precautions to ensure your data is secure at all times. Your data may be stored indefinitely to ensure we have records of service, payments, and other interactions we have with you and to be able to provide copies to you in the future, for more details please see our Data Retention and Erasure policy.

In order to provide our services to you, we may use recognised third parties to take payment, conduct credit reports and other checks, manage our company accounts and provide banking services. We will store transactions, payment and order data for up to 7 years or for as long as required by UK financial and company regulations. These third parties may operate outside the EU, if this is the case we will ensure precautions are in place to protect your data.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to find out more about how the processing for the new purpose is compatible with the original purpose, please email us. If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing.

We may be legally obliged to disclose your personal information without your knowledge to the extent that we are required to do so by law; in connection with any ongoing or prospective legal proceedings; in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk); to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.



## Our obligations

In relation to our customers, suppliers, and other third parties we are a data controller. In that regard and in relation to the information that you provide to us, we are legally responsible for how that information is handled. We will comply with the GDPR (2018) in the way we use and share your personal data.

Where we collect, store, and process data on behalf of our clients we are the data processor and as such will accept our responsibilities under GDPR and ensure that we clearly define the relationship and responsibilities with the data controller.

As either Controller or Processor we will respect your rights under GDPR, this means that we will only use your personal data:

- Fairly and lawfully
- As set out in the legislation and this policy
- To the extent necessary for these purposes
- We will take steps to ensure your data is accurate and rectify data as necessary

Under certain circumstances, you have rights under the data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

You can see more about these rights at: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## Third Parties

We may have to share your personal data with the parties set out below for the purposes described in this document:

- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, credit scoring, banking, legal, fraud protection, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.
- Our clients and their representatives as required to meet our contractual obligations
- Law enforcement agencies

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

We may share your details with our accountant and with our pension provider.

## Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We will report any breaches or potential breaches to the appropriate authorities within 24 hours and to anyone affected by a breach within 72 hours. If you have any queries or concerns about your data usage, please contact us.

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

As well as your ability to accept or reject cookies, we also require your permission to store cookies on your machine, which is why when you visit our site, you are presented with the ability to accept our terms of use, including the storage of cookies on your machine. Should you not accept then you are free to leave our website, at any time.

## Legitimate Interests

Under the GDPR, we are also permitted to collect, process, and store your data as required to reasonably operate our business. We may need to share some information with third parties who use such data for non-marketing purposes (including credit and risk assessment and management, identification and fraud prevention, debt collection and returning assets to you). Where we rely on Legitimate Interest as our Lawful Basis we will complete a Legitimate Interest Assessment to ensure we respect your rights under GDPR.

## Contacting us, exercising your information rights and Complaints

If you have any questions or comments about this Privacy Policy, wish to exercise your information rights in connection with the personal data you have shared with us or wish to complain, please contact the data controller using the details above. We will process SARs within one calendar month, SAR responses are usually free but we reserve the right to charge for excessive or unfounded requests. We fully comply with Data Protection legislation and will assist in any investigation or request made by the appropriate authorities.

If you remain dissatisfied then you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
[www.ico.org.uk](http://www.ico.org.uk)