## **FINEPLAN VIDEO SERVICES**

**FVS** 

The Commercial, Industrial & CCTV Distribution Division of:

Fineplan Securities Limited
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United Kingdom

## **GDPR**

The General Data Protection Regulation, GDPR for short, will become UK law with effect from May 25th through the Data Protection Act 2018.

The essential change the new law makes is to give you more control over the data we hold about you. We have only ever collected your name, address, telephone number, email address and in some instances your credit or debit card number when you pay for goods after ordering on the phone. Credit card details are not retained.

Under the latest legislation, you will have the right to see what personal information we hold about you. How we collect it and use it, and the right not to be included in the readership of any of our products, if that is what you want. To be "forgotten" as the new legislation terms it. The greater transparency, enhanced rights and increased accountability that GDPR affords each of us, is welcomed. We understand the importance of maintaining the confidentiality of any information you may provide while using our website, or catalogue and we remain committed to your to privacy. Our updated privacy policy expands upon how we will continue to protect the confidentiality of any information you may have provided. We want you to easily understand your rights and our obligations towards you and the data we hold about you, and be clear about your ultimate sanction to stop us using your data. So let's start with a few definitions.

#### Personal Data - What it is and why we hold it.

It is your name, address provided, telephone number and in some cases e-mail address and if you are purchasing items by a telephone call then also your card details. We hold no personal details beyond this unless you have provided another delivery address as an alternative delivery point for our information.

#### The Data Subject - who is it?

It's any person who provides Personal Data directly, or who finds themselves in receipt of material perhaps personally requested, or possibly as a result of shared use, or through non personalised distribution. The Data Subject has the right to know what information is held, how it is being used and by whom, and to end their inclusion on such lists.

#### Data Controller - what it is and what it does.

It's the entity responsible for the collection, maintenance, security and use of Personal Data. Its obligations include the maintenance of privacy and security of Personal Data; to provide the Data Subject with access to the information on file; to meet the requests of the Data Subject in relation to its personal record. This may ultimately include a restriction of use, or the removal of that data.

#### The Right to be Forgotten

Perhaps GDPR's strongest element, it confirms in law, the right of the individual to stop the inclusion of their Personal Data in any distribution list, where there is not a legal requirement for such inclusion.

#### Legitimate Interest

This is the most flexible lawful basis for data processing. It is most appropriate where personal data is used in a way data subjects would reasonably expect, and which has a minimal privacy impact upon them. Legitimate Interests can be those of the Data Controller or third parties, or the Data Subject itself. It can embrace commercial interests but the processing must be that necessary to achieve the end result, whilst taking account of the individual's interests and rights of privacy.

## FINEPLAN VIDEO SERVICES



# **Our Privacy Policy**

Our e-mail or catalogue promotions are only sent to persons or companies that have either purchased or enquired about our product. We, as the data controller in respect of all personal data we hold, are required to provide you with specific information about how we will use, hold and retain this data, as well as making you aware of various rights that you have under this legislation. We have set out this information below.

Under GDPR we are required to tell you the identity of the legal person who controls your personal data. Fineplan Securities Limited t/a Fineplan Video Services (Company Registration Number 888421) is the data controller responsible for your personal data collected through our website, by post, telephone or personal visit to our showroom. Fineplan's registered office is at 1 Locket Road Harrow HA3 7LY. Should you ever have an enquiry about what we hold, or how we process your personal data, your first contact should be our Data Protection Officer Howard Barbarash, by post at our Harrow address, or email: admin@fvs-cctv.com phone: 02088630666.

Why we process your personal data? We process your personal data for the following purposes: □ the sale of the CCTV product that we distribute and to provide you with up to date product information.

The legal basis on which we process your personal data Our processing is based on Legitimate Interest. That is to sell you the product that you have ordered and to inform you of new product and prices whether by e-mail or a catalogue sent by post.

Opting out of promotional Services You can ask us to stop sending you our catalogue or e-mailing you with product details or offers at any time by following the opt-out links on any digital communication sent to you or by contacting us at any time.

Right to be Forgotten Where you wish to exercise your right to be forgotten, please do so by contacting our Data Protection Officer at admin@fvs-cctv.com. We will remove all personal data relating to you within the regulation's statutory 30 day period.

Please bear in mind that some communication may still be received during this window, especially in the case of postal publications which may be in the process of being mailed to you as your request is submitted.

Is it a legal (statutory or contractual) requirement for you to provide us with your personal data? If you chose not to provide certain information when requested, we may not be able to perform any contract we have entered into with you or we may be prevented from complying with our legal obligations. For example, not providing us with your email address will mean we are unable to send you invoices that are lost or not sent with your purchases.

Who might we share your personal data with? We only pass personal data to a credit card company for authorisation of your card or to a factoring company where you purchase goods an a credit account... We do not sell or provide information to any other party.

We may transfer your personal information to a third party as otherwise permitted by UK data protection law, for example to our legal advisors or in order to comply with a legal requirement or obligation placed on us by law.

How long do we keep your personal data for? We will retain your personal data for as long as necessary to fulfil the purposes for which it was collected and for an indeterminate period after that to provide you with e-mail or catalogue information, including for satisfaction of any legal or accounting requirements.

What are your data protection rights? As a "data subject" under GDPR you have a set of specific

rights and we are required to make you aware of the existence of these rights. They are in outline:	
□ the right to request from us, as the data controller, access to your personal data;	
□ the right to request rectification of your personal data;	
□ the right to request erasure of your personal data;	

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For further details on these rights, when they apply, how to exercise them and the exemptions and wider rules that apply to such rights, please visit the Information Commissioner's website at www.ico.org.uk.

Your right to withdraw consent where processing is based on consent Where any part of our processing of your personal data is based on your consent you may withdraw your consent to that processing at any time.

Your right to complain to the Information Commissioner's Office If you are unhappy with how Fineplan is using your personal data we would encourage you to raise this concern with our Data Protection Officer at admin@fvs-cctv.com.

You have the right to lodge a complaint about our compliance with the UK data protection legislation with the applicable regulator for data protection. This is the Information Commissioner's Office. For more information you can visit their website at www.ico.gov.uk

**Use of automated decision making or profiling** We do not carry out automated decision making or profiling.

#### The data we collect about you and how we collect it.

**User records** Each request to receive a publication or newsletter creates a reader record for that user. Personal data to generate an account is collected when a user registers for our services on one of Fineplan website subscription pages, via postal registration and via telephone registration. The personal data processed in these instances are: - Salutation - Name - address - telephone number - email address.

Fineplan aims to keep this information up to date but you should inform us if there are any changes. We will continue to provide our services to you until we are informed of changes.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

**Changes to the privacy policy** We reserve the right to add to or change the terms of this privacy policy in our sole discretion, without prior notice to you. If we change this privacy policy, we will update the new privacy policy on the website, and it will become effective from the time of posting to the website. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.