



**ROBOWATCH**  
THE TOTAL SECURITY SOLUTION

# **Group Two Ltd t/a Robowatch**

## **Information Security & GDPR Policy**

**Date Reviewed  
1<sup>st</sup> August 2024**



## **GDPR Privacy Notice.**

### **Background**

This privacy notice lets you know what happens to any personal data that you give to us, or any that we may collect from or about you. It applies to all services, and instances where we collect your personal data.

This privacy notice applies to personal information processed by Group Two Limited t/a Robowatch.

Who are we?

Legal entity: Group Two Ltd is a limited company registered in England & Wales.

Registered number: 3611396

Registered Office: Bank Chambers, 1 Central Avenue, Sittingbourne Kent ME10 4AE

Purpose of Processing: CCTV & Alarm Installation & Remote Monitoring,

Legal Basis: Contractual requirement.

ICO Registration number: Z8398668

<https://ico.org.uk/ESDWebPages/Entry/Z8398668>

For ICO Data Protection Register – Entry Details please see pages 6 & 7

### **How to contact us:**

We can be contacted on [sales@robowatch.co.uk](mailto:sales@robowatch.co.uk)

Or by mail to:

Group Two Ltd t/a Robowatch

Units 1-5 Harden Road Industrial Estate

Harden Road

Lydd

Kent

TN29 9LX

### **What data do we hold?**

We hold information on our staff for employment purposes.

We hold and process data provided by and consented for by you as part of the quotation & implementation of CCTV & Alarm security for your sites and as contractually requested by our clients and your employer.

This data will have been provided in writing, verbally or electronically as part of an initial enquiry to us or as part of ongoing management of an existing site.

This data includes:

The company details as well as:

- \* Staff Names
- \* Head Office & Site Addresses
- \* Staff contact details including mobile phone number, landline and email addresses
- \* Images (Photographs & video recordings) of requested sites
- \* Company credit scores & history

All data is held centrally at our Head Office in Ashford, Kent. All data is held securely on password protected Servers and PC's.

Only authorised Group Two Ltd vetted employees & sub-contractors have access to client information for the purpose of protecting their sites as requested.



All backups are encrypted and carried out within the European Union.

The Robowatch systems are protected by a hardware firewall at the perimeter and software firewall's within the perimeter.

Various encrypted data backups are run on a daily basis both to an internal destination and to a known secure off site location.

Standard Windows authentication is used to ensure that users only have access to required data.

Emails - Mailguard scans all incoming and outgoing emails to remove both SPAM and virus emails using five different Anti-Virus engines. In addition it provides a failover in case of disruption to your mail services, in this case you can logon to MailGuard and send and receive emails with little disruption to service.

The SPAM engines also include CEO Fraud algorithms, real-time blacklisting of brand new domains and protection against 'looks-like' and 'sounds-like' version of your domain.

Paper – All documents that may contain any company or personal data is transferred onto the company secure servers and then shredded.

Telephone recordings – telephone conversations that may contain any company or personal information is stored on a secure server and retained as long as is currently required by the Security Industry Authority standards and then deleted.

Group Two Ltd t/a Robowatch only use the company & personal data received to undertake the role as the security provider for the client.

### **Where do we get this data from?**

From you when completing an enquiry either verbally, electronically or in writing for us to provide you (the client) with a quotation & ultimately to protect your site with CCTV cameras.

From other sources such as Credit Reference Agencies, publically available directories and information (for example, telephone directory, social media, internet, news articles).

### **What do we use this data for?**

- \* To process your enquiries to the requested quotations for a security solution.
- \* To set up & install CCTV & Other security options for the protection of your site & assets.

### **What do we use the CCTV images & footage for?**

- \* To remotely monitor the requested site, asset or area from illegal intrusion, trespass, theft, illegal activities and health & safety.
- \* To provide footage of incidents, thefts or health & safety at the request of the client to authorised personnel.
- \* At the request of the client or following a legal warrant, to provide the government enforcement agencies (Police, Customs etc.) with required footage or images to assist in ongoing criminal offences.

### **Access to Your Data as well as Footage & Photo Requests**

Footage requests from the client or authorised enforcement agencies are either sent using:

- \* Secure cloudstation with password protection.
- \* On a disc sent by recorded delivery to the client using an exe file that cannot allowing any Tampering. The request is logged in accordance with the Security Industry Authorities guidelines & standards.
- \* All footage sent on disc to the Police is evidence bagged and tracked.

Photographic Image requests from the client or authorised enforcement agencies are either sent using:

- \* Secure email to the clients request email address



You have the right to ask for a copy of the information the Company holds about you (we may charge £10 for information requests to cover our costs in providing you with details of the information we hold about you).

In certain circumstances, such as where the data is no longer necessary for the purposes for which it was collected, you have a right to require us to erase all personal data held about you. **Note: There are a number of exemptions to this right, for example in relation to freedom of expression and compliance with legal obligations.**

### **What are the legal grounds that allow us to process your data and if applicable share your data?**

Where it is needed to provide the client with requested with required footage or images and by provision of signed application and consent from yourself providing us with consent to do so.

### **Who do we share data with?**

We may share your data with:

- \* All contacts provided as part of the initial enquiry, quotation & installation sign off process.
- \* We may also share company or personal data with the below third parties as part of our contract to protect the site, staff, assets requested.

1. Creditsafe Reference Agency
2. The SIA  
<https://www.sia.homeoffice.gov.uk>
3. UK Police  
<https://www.police.uk/>

### **When keyholding is required**

4. The Keyholding Company  
<https://www.keyholding.co.uk/>
5. Mitie Security  
<https://www.mitie.com/services/security/>
6. Citiguard Security Keyholding  
<http://www.citiguardsecurity.com>

7. Licenced Subcontractors

### **How long do we keep your data (addresses, telephone numbers & email addresses)?**

- \* For as long as we have a reasonable business need to do so.
- \* As long as the site is open
- \* Your data is retained only whilst of “use” to us.
- \* Whilst any criminal investigation by the enforcement offices is being completed.
- \* Client requests for quotations – If the job is awarded then then information I kept for as long as the site is operational and we are monitoring it. If the job is not awarded then we delete the information after 12 months.
- \* Business contact details are kept on the “Salesforce” database for as long as deemed required for business purposes

### **Staff Details**

- As long as staff are employed by Group Two Ltd
- On leaving the company - these are kept for as long as required for tax, pension and contributions purposes as required by HMRC or other enforcement agencies

### **How long do we keep your requested footage or images?**

- \* Requested footage of site by the client is stored on secured & password encrypted servers for the duration that the site remains open.
- \* Those sent to the client or authorised personnel via the cloud station is deleted after one week.
- \* Whilst any criminal investigation by the enforcement offices is being completed.



### Footage & Images

These are stored for:

- 6 months and then deleted
- As long as a criminal investigation is being undertaken by law enforcement agencies
- Information can be disposed of when a site has been completed at the request of the client.

### Your rights under GDPR

You have the right to:

a) To Access

You have a right to access all data held by the "Data Controller"

b) To Rectify

You have a right to request data held is rectified.

c) To erase (where appropriate and technologically possible)

You have a right to request your data is erased.

d) To withdraw consent

You have the right to withdraw consent

e) To make a complaint

All complaints should be made to:

The Information Commissioner's Office which enforces data protection laws: <https://ico.org.uk/>. Or you can contact us directly via [sales@robowatch.co.uk](mailto:sales@robowatch.co.uk)

### What if your personal information changes?

You should tell us so that the data we hold is accurate.

### Do you have to provide personal information to us?

No, but if you do not provide this it may mean that we are unable to complete the requested quotation or install the required security solution as required at your site.

### How do we use your data in our Marketing?

We only use the data we are provided with by the company for marketing new products or services. Your data will only be used as part of the quotation & ongoing service requirements.

No data is passed to third parties other than listed in section 9.

### **Contact Us**

If you would like any further information regarding the is Privacy Notice of if you need further information on your rights please contact us on:

[sales@robowatch.co.uk](mailto:sales@robowatch.co.uk)

Signed: 

Date: 1<sup>st</sup> August 2024

Daniel Hughes, Managing Director

## Data Protection Register - Entry Details

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**Registration number:**

Z8398668

**Date registered:**

26 January 2004

**Registration expires:**

25 January 2025

**Data controller:**

GROUP TWO LIMITED

**Address:**

UNIT2 St JOHNS COURT

FOSTER ROAD  
ASHFORD  
KENT

TN24 0SJ

**Other names:**

- Robowatch,

GROUP TWO LIMITED

**Nature of work - CCTV and Crime Prevention**

**Description of processing**

The following is a broad description of the way this organisation/data controller processes personal information. To understand how your own personal information is processed you may need to refer to any personal communications you have received, check any privacy notices the organisation has provided or contact the organisation to ask about your personal circumstances.

**Reasons/purposes for processing information**

We process personal information using a CCTV system to monitor and collect visual images for the purpose of security and prevention and detection of crime.

**Type/classes of information processed**

We process information relevant to the above reasons/purposes. This may include; personal details, personal appearance and behaviour; visual images.

We also process sensitive classes of information that may include:

- offences and alleged offences
- criminal proceedings, outcomes and sentences
- visual images, personal appearance and behaviour

### **Who the information is processed about**

We process personal information about:

- staff
- customers, clients
- offenders and suspected offenders
- members of the public and people in the area which is under CCTV surveillance

### **Who the information may be shared with**

We sometimes need to share the personal information we process with the individual themselves and also with other organisations. Where this is necessary we are required to comply with all aspects of the Data Protection Act (DPA). What follows is a description of the types of organisations we may need to share some of the personal information we process with for one or more reasons.

Where necessary or required we share information with:

- business associates
- service providers
- enquirers and complainants
- police forces and security organisations