



Privacy Notice

1. Process Controller's identity and contact details

AB Systems (UK) Ltd are data controller for their own business information. You can contact us by emailing info@agbag.co.uk

2. What information is collected

We store your company name (if applicable), full name, address(es), phone number(s), email address(es) and website (if applicable). If you visit our premises outside of office hours we will also record your image via our CCTV system.

3. How your information will be used

No information is ever passed to a third party for sales and marketing purposes. We use your information only to communicate with you, bill you and deliver the services you have requested us to provide. CCTV images may be used only in the event of an incident (e.g. Health & Safety or Criminal Offence) for investigation and the potential further involvement of appropriate authorities (e.g. the police or HSE).

4. Legal basis for processing your data

Our legal basis for processing your data is three fold:

- a. The contract (verbal or written) between us to provide information, quotations or the service requested.
- b. Our legal obligation to maintain registered accounts.
- c. Your explicit consent is given when you read this notice and then choose to provide the requested information. Or, if you make verbal contact with us we will make you aware of where to find this information and outline it to you.
- d. Our legal basis for making CCTV recordings is our legitimate interest to prevent and detect crime, safeguard staff and visitors and ensure compliance with health and safety procedures.

5. Who receives your information

Only persons working for and with AB Systems (UK) Ltd will have access to the information, and only as much as is required to carry out your request or the services requested by you.

We do use sub-processors for cloud storage and servers on which we store information and websites. We also use email companies. The sub-processors we use are:

- | | |
|---------------------|---------------------------------|
| a. Google | f. Seagate |
| b. Dropbox | g. Linode |
| c. KB Software Ltd | h. Rsync.net |
| d. Simpkins Edwards | i. Amazon Web Services via Arlo |
| e. Sage | |

6. Where your information is stored and how it is kept secure

Your information storage and security depends on what we hold on your behalf:

- a. Personal information is stored within our CRM system which is accessible only by passworded accounts given to users authorised by AB Systems (UK) Ltd directors. The CRM system is hosted on a cloud server operated by Linode. The system is also available on our individual devices which are password protected.
- b. Contractual information, quotations, as well as specifications, documents and information related to specific services or projects we are required to undertake for you are kept on:
 - i. Google Drive, Sage and Seagate. Access to these is via controlled passworded accounts. Additional Share Permissions on the folders ensure that access to your information is by only those who need it.
 - ii. Very occasionally we may use Dropbox and the same controls are utilised.
- c. The CRM is backed up to a cloud server each night. The server is operated by Rsync.net. SSH keys are used to encrypt the data as it is transferred to the Cloud Server. The data held on the server is encrypted AES-256 in counter mode and authenticated using Poly1305-AES. Access to the backed up data is only from our laptops through the encrypted SSH connection.
- d. The Seagate local drive is backed up regularly on a Seagate HDD, both drives are held in separate locked premises.
- e. Sage accountancy data is transferred to Simpkins Edwards, by hand, delivered on a storage device.
- f. CCTV images are kept on a recording device located in the office. No live monitoring is used. The unit is passworded with access only by the person responsible for CCTV. The office is kept locked when unattended. Images may be processed by Amazon Web Services on behalf of Arlo in order to send images to remote monitoring equipment if the system is activated by movement sensors when the office is unattended.

7. Transfers of data to 3rd countries and safeguards in place

Data is held on EU data protection compliant servers. The only information we hold that might be transferred to 3rd party countries is:

- a. Contractual information, quotations, as well as specifications, documents and information related to specific services or projects we are required to undertake for you are kept on:
 - i. Google Drive (G Suite). Google's certification under the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks includes G Suite and Google Cloud Platform. They have also gained confirmation of compliance from European Data Protection Authorities for their model contract clauses, affirming that their current contractual commitments for G Suite and Google Cloud Platform fully meet the requirements under the Data Protection Directive to legally frame transfers of personal data from the EU to the rest of the world.
 - ii. Occasionally Dropbox. Dropbox relies upon a variety of legal mechanisms for its international transfer of personal data from the EU to the United States. They are certified under the EU-U.S. and Swiss-U.S. Privacy Shield Programs regarding the collection, use, and retention of personal data and its transfer from the EU and

Switzerland to the United States. In addition to Privacy Shield, Dropbox also provides strong contractual guarantees around the privacy of its services and relies on EU Model Contract Clauses to cover its international transfers of data.

8. How long your information will be kept

This depends on the information you provided us with:

- a. Your personal data is kept for as long as you are a customer. Sufficient information (e.g. Invoice details) in order to fulfil our legal obligation for producing accounts is kept for as long as is required by the HMRC, but at least 7 years.
- b. Contractual information will be kept for the period you remain a customer and for 12 years after our relationship ends. Quotations will be kept while you remain a customer.
- c. Backed up information for the CRM is kept for 6 months. Drives backed up locally are kept until you request your information to be deleted.
- d. CCTV images are kept for 60 days unless we are requested to keep them for longer by an investigating authority (e.g. the police or HSE) or we receive a subject access request.

9. Your rights

Under GDPR you have a number of rights for which we must provide, those that apply to the data we hold are listed below but more information is available here:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

- a. You should be informed by us about how we use your data (this document fulfills that obligation)
- b. You can request a copy of what information we hold on you.
- c. You can ask us to correct any errors in the information we hold on you
- d. You always have the right to require us to delete information for which we have no legal obligation to keep.
- e. You can request us to provide the information we hold to be provided in a suitable format for transfer to another organisation (this would normally be in the form of a .csv file).

10. How you can make a complaint

If you are unhappy with anything you can complain. Here's how:

- a. First, please let us know so we can put things right. Email to us at info@agbag.co.uk.
- b. If we don't resolve things to your satisfaction then you can report us direct to our supervisory authority, the Information Commissioner's Office, by ringing 0303 123 1113 or via live chat at their website: <https://ico.org.uk/concerns/>.
- c. More Information can be found here: <https://ico.org.uk/for-the-public/raising-concerns/>

11. More information

- a. Our Privacy Policy is here:
https://www.agbag.co.uk/media/link/document/Agbag_GDPR_Privacy_Policy_-_17-01-2019_Rev0.pdf

b. Our Data Protection Policy is here:

https://www.agbag.co.uk/media/link/document/Agbag_GDPR_Data_Protection_Policy_-_17-01-2019_Rev0.pdf