

SIACO

protecting your security spend

Version: 1/Apr25

Privacy Policy Purpose

This privacy notice tells you what to expect us to do with your personal information.

It includes the following:

- Contact details
- How to complain
- What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- Who we share information with

Scope

This policy applies to all employees, associates and suppliers who have access to any IT system in the business, including software, mobile devices and other forms of technology.

Compliance

This policy shall be reviewed annually, or earlier if deemed necessary and its implementation will be monitored regularly. Non-compliance with this policy may result in further action being taken against employees, associates and suppliers of SIACO Limited.

Contact details

Post - International House, 36-38 Cornhill, London EC3V 3NG

Telephone - 0208 137 0675

Email - enquiries@siaco.co.uk

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

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What information we collect, use, and why

We collect or use the following information to provide and improve products and services for clients:

- Names and contact details
- Business Addresses
- Payment details (including card or bank information for transfers and direct debits)
- Financial data (including income and expenditure)
- Transaction data (including details about payments to and from you and details of products and services you have purchased)
- Usage data (including information about how you interact with and use our website, products and services)
- Employment details (including salary, sick pay and length of service)
- Information relating to compliments or complaints
- Audio and Video recordings
- Website user information

Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO’s website. Which lawful basis we rely on may affect your data protection rights which are in brief set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

Your right of access - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. You can read more about this right [here](#).

Your right to rectification - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. You can read more about this right [here](#).
Your right to erasure - You have the right to ask us to delete your personal information. You can read more about this right [here](#).

Your right to restriction of processing - You have the right to ask us to limit how we can use your personal information. You can read more about this right [here](#).

Your right to object to processing - You have the right to object to the processing of your personal data. You can read more about this right [here](#).

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. You can read more about this right [here](#).

Your right to withdraw consent – When we use consent as our lawful basis you have the right to withdraw your consent at any time. You can read more about this right [here](#). If you make a request, we must respond to you without undue delay and in any event within one month. To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

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Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to provide and improve products and services for clients are:

Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Where we get personal information from

- Directly from you
- Audio and video recordings
- Publicly available sources
- Suppliers and service providers

How long we keep information

We retain information for the shortest duration as required by law or contract. Where this is not applicable, we retain information for the following durations:

- Directly from you (2 years from final engagement)
- Audio and video recordings (up to 180 days)
- Publicly available sources (between 3 and 5 years)
- Suppliers and service providers (3 years from final engagement)

NB: Sensitive personal information is assessed on a case-by-case basis.

Who we share information with

- Professional or legal advisors
- Organisations we're legally obliged to share personal information with
- Clients
- Suppliers and service providers
- Professional consultants

Ratification

Lewis Loveless

Lewis Loveless, Director