

# Lone Worker Solutions Ltd Privacy Policy



Protecting your team

## INTRODUCTION

In accordance with the existing UK Data Protection Act (1998) and the forthcoming enactment of GDPR requirements (EU 2016/679) - this data privacy document is intended to provide you with information as to how the Lone Worker Solutions Group of companies treat personal data received from you in connection with our legitimate business activities.

Lone Worker Solutions have implemented documented systems and processes that are aimed at full compliance with the major principles that are the basis of GDPR and the Data Protection Act requirements; namely:

**Data Accuracy** - the requirement that all personal data collected and processed by the Group shall be Accurate and Correct;

**Data Minimisation** - the requirement to only collect, process and retain the minimum of data that is appropriate to the lawful purpose for which it has been collected and used;

**Integrity and Confidentiality** - the requirement for those systems and processes on which such personal data is held to be secure, confidential and to have integrity of purpose, maintenance and retention - preferably with such requirements built into those systems rather than being appended;

**Lawfulness, fairness and transparency** - the requirement for the legal, contractual or other valid justification for the collection and use of such personal data and for its fair and transparent use;

**Purpose limitation** - the fair and transparent identification, to the data subjects, of the valid purposes/reasons for the requirement for the collection and processing of their personal data - which should not be open-ended, but which shall be specific and unambiguous;

**Storage limitation** - the fair and transparent identification of the justifiable retention periods for such personal data.

## DATA COLLECTION AND HANDLING:

In order to fulfil its requirements to operate as businesses whilst fulfilling the above identified GDPR and Data Protection Act needs - the Lone Worker Solutions Group of Companies are required to collect, maintain, process and retain personal data, records and other applicable information related to:

- Customers and their End-Users of our Products and Services;
- Suppliers and Subcontractors - including (in the case of Lone Worker Solutions Ltd) their subcontract Alarm Response Centres (ARC);
- Our own Employees (i.e. Personal, Financial, Training & Competency - and in the case of Lone Worker Solutions Ltd - their applicable Security Screening - meeting BS 7858 and BS 8484 requirements etc.);
- All relevant Business Transactions and Contract data;
- All Company Financial Data etc.

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**Lone Worker Solutions Ltd**  
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Cowm Top Lane. Rochdale  
OL11 2PU. United Kingdom

Registered in England & Wales  
Registered Number: 06999425  
VAT Number: 993 6668 50

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The Lone Worker Solutions Group of Companies shall only collect and process personal data for which there is adequate lawful justification.

The Group's Management Team shall maintain all such data securely within its own facilities (including its own computer networked systems etc.) and shall seek to always comply with GDPR and the Data Protection Act requirements; ensuring that they annually renew each of their individual Group Company Registrations with the Information Commissioner's Office (ICO); which also serves to identify the type and quantity of personal data that is collected, processed, maintained and retained by each Company:

- Lone Worker Solutions Ltd - ICO Company Registration Number Z2895610 - renewable every October each year.
- Continuum Ltd - ICO Company Registration Number Z697127X - renewable every July each year

Our own Group Computer Network Systems and Servers are protected and hosted by independently certified and approved hosts (i.e. they are approved by independent UKAS-Accredited Certification Bodies as meeting BS 27001/27002 requirements); and appropriate firewalls, data encryption and other systems are put in place by the Group's Management to ensure that no non-authorised personnel may gain access to any such records (see Group Procedure QS10 - Information Security)

The Lone Worker Solutions carry "Cyber Essentials" Certification from ECSC Group PLC - against the Cyber Essentials Scheme Test Specification; and also carry "Secured by Design" Approval - a UK Police Crime Prevention Initiative.

Additional Emergency/Disaster Recovery and Business Continuity Procedures are also in place against the possibility of any future issues - despite the input of all applicable preventive measures being taken etc.

Lone Worker Solutions Ltd also carry National Security Inspectorate (NSI) Guarding Gold Approval - meeting the latest issues of BS EN ISO 9001, BS 8484 and BS 7858 requirements.

To ensure compliance with the above legislative requirements the Group have appointed a Group Data Protection Officer (as covered within Group Policy/Procedure QS14); and who also fulfils the role of the Group Chief Security Officer (as further detailed in the Group's Information Security Policy/Procedure).

## ACCESS TO AND PROCESSING OF ALL SUCH DATA:

Only applicably authorised, competent and, where relevant (i.e. Lone Worker Solutions Ltd) security-screened personnel have access to any such data for retention or processing purposes - in line with the relevantly issued Company Procedures and Process described within the Group Company's documented Quality Management System (especially the aforementioned QS10 and QS14 Policies and Procedures). Access rights are controlled in line with defined and documented systems contained within Group Procedure QS14.

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## RETENTION AND DELETION OF ANY SUCH DATA:

The Group's Management Team ensure that all such data, records and other applicable information is securely maintained/retained - in line with what is stated within our Company Procedure for the Control and Retention of Records (QS03); and again the aforementioned QS10 and QS14 Policies and Procedures etc.

Only applicable Company Directors (acting on the advice from the Group's Data Protection Officer) can provide the authorisation for the controlled deletion of any such applicable data (held either as hard-copy or electronically-held data).

## SECURITY SCREENING OF ALL PERSONNEL WHO HAVE ACCESS TO LONE WORKER PERSONAL DATA, AND SIA-LICENSING OF ARC PERSONNEL:

All Lone Worker Solutions Ltd personnel who have controlled and authorised access to such data are pre-employment Security Screened meeting BS 8484 and BS 7858 requirements; which incorporate DBS checks - in line with the Company's Recruitment and Screening Procedure (QS13); which satisfies these needs, and which is regularly checked at Audit by the National Security Inspectorate (NSI).

Our subcontract UK ARC's personnel (i.e. Control Room and specifically dedicated Alarm Response Officers) are similarly security screened to BS 8484 and BS 7858 requirements, in line with their own defined and documented procedures meeting the same requirements and, additionally, all such personnel are also licensed by the Security Industry Authority (SIA) giving them approval to work within a security environment.

## ADDITIONAL CONTROLS APPLICABLE TO LONE WORKER END-USER DATA:

Lone Worker Solutions Ltd collect and process personal data relating to Lone Worker Device End-Users - either supplied from their own authorised Company Representatives (under contract) or directly from such End-User Lone Workers, via our Website, Mobile Apps and/or Lone Worker Devices; and such data is then shared with our subcontract ARCs and is then further processed in order:

- To provide them with a personalised Lone Worker Device Service - which is constantly monitored and covered by our subcontract Arcs' alarm-response systems for their everyday protection whilst at work;
- For processing Lone Worker requests;
- For providing Lone Workers with information via email or other means;
- For providing Customers' representatives with Lone Worker Statistical data and analysis - concerning device repairs and returns, the use that is made of the on-line training packages and the ongoing usage of the Lone Worker Devices and Apps made available to each Lone Worker, all alarm conditions experienced and whether the Company is achieving its agreed Customer SLA requirements etc.;

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- For maintaining Accounts and financial records related to Lone Worker Device Services provided etc.;
- For analysis of the results of ARC responses - to ensure they comply with applicable BS 8484 requirements.

If Lone Worker Solutions Group End-Users are provided with a User Identification Code, Password or any other such data as part of the LoneWorker Manager Platform and Safety Modules then such Lone Workers are required to treat such information as confidential and keep it/them secure - ensuring that they do not disclose any such data to any third party.

Lone Worker Solutions Ltd reserves the right to disable any User Identification Code or Password (whether chosen by the End-User or provided by the Company), at any time, if it appears that such requirements for confidentiality and security have been compromised - in line with this Policy or the applicable Terms and Conditions applicable for the provision of Lone Worker Device Services etc.

Lone Worker End-User personal data may be disclosed to other third parties in relation to Lone Worker Protection activities (e.g. ARC personnel, our own Certification Bodies - who are required to determine the efficacy of our Lone Worker Device Services, and to Emergency Services personnel who will be required to react to any given alarm condition) etc.

## CHANGES TO THIS PRIVACY POLICY:

Any future changes to the Groups Privacy Policy and Procedures shall be reflected by the revision/update of this document.

It is, therefore, recommended that you visit this page on each of the Group Company's Websites, from time to time, to review and take account of any such changes.

In line with our Quality Management System controls - all such Policies and Procedures must be subject to regular review and shall be revised and updated as necessary to ensure they continually comply with all applicable standards and legislative requirements.

## INFORMATION SECURITY INCIDENTS / POTENTIAL DATA-BREACHES:

In the event of any notified or internally-identified Security Information Incidents and/or potential Personal Data Breaches - the Group Data Protection Officer shall initially investigate their validity and shall confirm such findings with our partner Cyber Security Experts (ECSC plc) - who will further forensically investigate all such potential incidents and provide the Group's Management with applicable data confirming or refuting that any Data Breach has occurred (and the possible nature and severity of any such confirmed data breach) etc.

Such independent third-party findings are considered invaluable in ensuring the Group continue to meet GDPR requirements and that any resultant recommended corrective and preventive actions are taken as necessary.

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Once confirmed, any personal data breach shall be notified to the relevant Supervisory Authority (e.g. in the UK this will be the ICO); and actions shall be agreed to notify all individuals whose data has been compromised in line with GDPR requirements.

## Contact

Should any individual, whose personal data is collected and processed by either of the Lone Worker Solutions Companies, need to make contact with us for any reason (but especially if they require to make a request for free access to the personal data that we have collected and continue to process related to them, or in the event of any request to correct, minimise or delete any such data etc.) - then they shall, in the first instance, make contact with the following identified Group Data Protection Officer, and relate their requirements to him:

Group Data Protection Officer's Name: Adam Gilpin

## Contact Details

[adam.gilpin@loneworkersolutions.com](mailto:adam.gilpin@loneworkersolutions.com) (or) by our Mailing Address: Lone Worker Solutions Limited, 2C Crown Business Park, Cowm Top Lane, Rochdale OL11 2PU, UK.

These terms shall be governed by and construed in accordance with the laws of England and Wales. Any disputes arising from matters relating to the Website shall be exclusively subject to the jurisdiction of the courts of England and Wales.

## CHANGES TO THIS PRIVACY POLICY

Any changes made to this Privacy Policy in the future will be posted on our company's website [www.loneworkersolutions.com](http://www.loneworkersolutions.com). It is recommended that you visit this from time to time to review any changes. This Privacy Policy was last updated on 18<sup>th</sup> February 2018.

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