



GDPR Privacy Statement

Document Version History

The version of this document is indicated by the version number in the footer of this document. Please update this table when any approved changes are made.

Version	Date	Changes	Author
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Summary

This is the privacy statement for Smarthouse Audio Visual. This statement details how Smarthouse Audio Visual, website, services, and any 3rd party providers collect, use, secure, transfer and share your information.

Smarthouse Audio Visual are providers of Audio Visual systems, internet distribution, CCTV and home automation.

The companies address is: 5 Talmena Avenue, Wadebridge, PL27 7RP.

Classes of data collected and processed

As a company we mainly provide home automation and as a result we primarily collect and process data in relation to the following data subjects;

1. Customers & Suppliers of Smarthouse Audio Visual (Users data)
2. Data belonging to Users Customers
3. Data belonging to Employees and prospective Employees/Applicants

The type and amount of data that is collected, is different in relation to these two types of “data subjects”.

Employees/Applicants	Users/Suppliers	Users Customers
Full name	Full name	Full name
Address	Address	Gender
Nationality	Contact numbers	Date of birth
Date of birth	Company status	
Previous address	Email addresses	Address
Email address	Industry	Contact numbers
Contact numbers	Payment history with Smarthouse AV.	Bank details
Employment History		
Passport number		
Driving licence number		
Bank details		
Salary details		
UCR Number (where applicable)		
Health information		

How we collect this data?

Employees/Applicants	Users/Suppliers	Users Customers
From the individual through the website	From the user through the website	From the user through the website
During conversations over the phone	During conversations over the phone	Post
Email	Email	Email
Post	Post	During conversations over the phone
Recruitment agencies	Companies House	Client meetings
Health Professionals		

In addition, we may also gather information, only in relation to Users, from our key accounts, where there is a contractual relationship for us to supply our goods and services to their members/users at which point they then become our Users. Consent is supplied to the key account by the user for this transfer to take place.

Why do we collect this data?

The reasons we collect information is different depending on the types of “data subject”

Employees/Applicants	Users/Suppliers	Users Customers
Access the suitability of the applicant	Assess the suitability of the service	To enable us to provide quotations
To administer the employee/employer relationship	To enable the smooth operation of the service	To keep communication open during length of project
Pay salary	Administer and manage the account	To collect payments and manage billing
Due diligence	Manage billing	To enable our engineers to visit sites and carry out necessary works
Manage effective communications	Manage communications	To enable our sub contractors to visit sites and carry out necessary works
Ensure contractual obligations are met	To source electrical and home automation equipment	
Compliance & regulatory obligations	To request quotations	
Absentee due to sickness		

Lawful basis of processing

The lawful basis of processing is direct based on the “data subject” as detailed below:

Employees/Applicants	Users/Suppliers	Users Customers
Consent - We may process your data to tell you about any opportunities that may be of interest to you.	Consent - We will process your data to tell you about our services and improve the service we give to you.	Legal Obligation - Data is processed in order that the User can comply with their regulatory obligations.
Contract - We will process your data to perform necessary actions to deliver our commitment under the contract we have with you.	Contract - We will process your data to perform the necessary actions to deliver our commitment under the contract we have with you.	Contract - Data is processed so that the User can fulfil the obligations under the contract they have with the customer.
Legal Obligation - We will process your data to comply with our regulatory obligations.	Legal Obligation - We will process your data to comply with our regulatory obligations.	
Special Category - We may process health data if you are absent due to sickness or injury.		

Data sharing

Smarthouse Audio Visual, will only share User data, and Employees/Applicants data with its partners in order to fulfil its obligations under the contract it has with them and to satisfy the Legal Obligation requirement.

Smarthouse Audio Visual will only share Users customer data with its partners in order to carry out the various checks and screens that are required under the Users Legal Obligation requirement and in accordance with fulfilling the contractual obligations.

Smarthouse Audio Visual may share data with prospective/future employers in respect of current and past Employees.

Nothing in this document will prevent Smarthouse AV from making any disclosure of data as required by law or by any competent authority.

Smarthouse Audio Visual does not share any data for any other reason other than what is stated above.

In respect of data that is shared as above, Smarthouse Audio Visual contractually requires all service providers and/or recipients, to safeguard the privacy and security of personal information they process on our behalf and authorise them to use or disclose the information only as necessary to perform services on our behalf or comply with legal requirements.

Smarthouse Audio Visual reserve the right to transfer your information in the event of a sale or transfer (wholly or partially) of our business or assets, with reasonable efforts on the acquirer to protect/use the information consistent with this statement.

How long do we keep information?

In respect of Users/Supplier data:

We only keep information for the amount of time necessary to fulfil the contractual obligation.

We will keep information for an extended period of time in relation to our Legal Obligation, but we will only keep the necessary information for this purpose.

In respect of Employee data:

We only keep information, for the amount of time necessary, to fulfil the contractual obligation.

We will keep information, for an extended period of time, in relation to our Legal Obligation, but we will only keep the necessary information for this purpose.

We will keep data, for an extended period of time, so that we can provide any necessary references required by the data subject.

This data will not be processed for any other reason beyond the term of employment.

In respect of User Customer data:

We will keep User Customer data for as long as the User deems it necessary under the terms of their privacy policy and in accordance with their data retention requirements under the legal basis of

processing between them and their customers. Smarthouse Audio Visual provides all the necessary tools and features within the system to enable Users to manage their data obligations as they require.

International Transfers

Smarthouse Audio Visual does not carry out transfers of data outside the EEA.

Data Subject Rights

The following outlines the rights that you hold in respect of the processing of your data by Smarthouse Audio Visual

Some of the rights may not apply or have limitations based on the legal basis of processing that is taking place.

Right to be informed

All Data Subjects will be informed that Smarthouse Audio Visual is processing their data and what legal basis that data is being processed under.

It is the Users sole responsibility to inform their customers of the data processing, reasons, and rights, as a result of that data being with Smarthouse Audio Visual.

Right of Access & Correction

All Users have the right to access all of the data about them which is being processed by Smarthouse Audio Visual. All data processed by Professional Office is held within the Users account on the system. As a result, all Users can correct any information held about them that is incorrect, using this facility.

Right to Erasure (Right to be Forgotten)

All Data Subjects have the right to be forgotten in relation to any data collected and processed as a result of the Consent basis of processing. If you would like to exercise this right, please contact us so that we can ensure your requirements are met.

Right to restrict processing

All Data Subjects have the right to restrict the processing of data held by Smarthouse Audio Visual to limit the activities it can carry out in relation to the Consent Basis of processing.

If you would like to exercise this right, please contact us so that we can ensure your requirements are met.

Right to Object (Right to withhold Consent)

All Data Subjects have the Right to Object or withhold consent to the processing of their data under the Consent basis of processing as detailed in the "Lawful basis of processing" table above.

If you would like to exercise this right, please contact us so that we can ensure your requirements are met.

Rights relating to Users, Customer data

The rights relating to data held by Smarthouse Audio Visual in relation to Users Customer data may differ from those stated above. However, those rights should be detailed and enforced by the User in accordance with their agreement between them and their customer.

Smarthouse Audio Visual cannot dictate or enforce those rights on the User, however Smarthouse Audio Visual will provide any and all practicable assistance to enable the User to fulfil their obligations under that agreement and any legal obligation.

How we protect Personal Data

The security of personal data is extremely important to Smarthouse Audio Visual, as a company we are committed to protecting the information we collect store and process. We maintain administrative, technical and physical safeguards designed to protect the data you provide, or we collect, against accidental, unlawful or unauthorised destruction, loss, alteration, access, disclosure or use.

Smarthouse Audio Visual stores data only for as long as it is necessary to fulfil the purpose for which the data is collected, unless otherwise required or authorised by applicable law.

Smarthouse Audio Visual takes appropriate measures to destroy or permanently de-identify any data it is instructed to remove from the system as required by the User or legal authority.

Updates to this statement

From time to time this statement may be updated in light of regulatory changes or changes in the manner or way in which Smarthouse Audio Visual operates in relation to its data. With this in mind we suggest you review this statement at regular intervals. If any changes are significant we will endeavour to notify you and ensure your ongoing consent and/or acceptance.

Feedback or Questions relating to this statement

For any enquiries relating to this statement Smarthouse Audio Visual can be contacted in the following ways:

Address

Smarthouse AV,

5 Talmena Avenue

Wadebridge

PL27 7RP

Telephone 07887712588

Email Info@smarthouseav.co.uk

Appendix one: Advice to customers regarding passwords

Can we please remind you of the best practise in regard to protecting your ICT systems:

1. Change your password as soon as our engineer finishes the work in your property
2. Set a password History policy to state how often an old password can be reused. It should be implemented with a minimum of 10 previous passwords remembered. This policy will discourage users from reusing a previous password, thus preventing them from alternating between several common passwords
3. Change your password every 90 days
4. A password should be over 8 characters and contain capital letters, and numbers

Appendix two: Advice to customers regarding CCTV and GDPR compliance

You should be aware that identifiable imagery is considered as personal data under the GDPR. As images are personal data under GDPR you must justify your use of it. Data subject's rights and freedoms cannot be overridden, especially in the case of legitimate interests. Even inside a work premises, employees have a right to privacy.

1. You should be aware that data subjects have the right to be informed. It is recommended that the use of CCTV is communicated via signage which indicates the areas covered and instructions for further information
2. It is recommended to conduct a data privacy impact assessment to ensure you can justify processing and that you are not excessively reducing the privacy of data subjects
3. One of the core principles of the GDPR requires personal data to be processed for only as long as its purpose requires it to be. Each camera and its purpose will need to be assessed to determine how long footage can be retained for. For example, a retail store would not be expected to retain footage for any longer than 6 months as by that time, any reported crimes would have been detected and footage reviewed. There are no defined acceptable retention times as it is subjective to the purpose, however be aware that years later or until the footage overwrites it, is not a good demonstration towards consideration of the data subjects rights
4. As with any other aspect of personal data, data subjects have a right to access, which could result in you disclosing footage to them. Business owners / CCTV operators will need to ensure that the requester is present in the footage and that by supplying the footage they do not disclose any personal data of another data subject. This may involve blurring parts of the footage such as figures or license plates
5. Any act of storage or access is considered processing and it is imperative that business owners or CCTV operators uphold the confidentiality and integrity of any footage. Screens displaying live or recorded footage should only ever be viewed by authorised individuals and not members of the public who stray past a security guard post or CCTV operation room. Footage should be secured regardless of its format, for example in electronic format it should be encrypted and in physical format be locked away and tracked via a signing process. Please follow our advice regarding internet services detailed in appendix one