



WILSON JAMES LTD

GENERAL PUBLIC GDPR PRIVACY NOTICE

18th MAY 2018

V1.0

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Title	General Public GDPR Privacy Notice	Date Issued	May-18
Owner	Chief Information Officer	Date Reviewed	N/A
Scope	This privacy notice applies to the interactions between the general public and Wilson James and should be served up at the point of data capture.		

About Us

Wilson James Ltd (or 'Us') is registered in England, with the trading address: Chalkwell Lawns, 648-656 London Rd, Westcliff On Sea, Essex, SSO 9HR. For the purposes of the General Data Protection Regulation (GDPR), Wilson James Ltd is a data controller with respect to the personal data that you provide to us.

Wilson James is committed to respecting and protecting your privacy. Questions and comments about this privacy notice are welcomed. These, and any enquiries about the processing of your personal data should be directed to dataprotection@wilsonjames.co.uk in the first instance.

What is Personal Data?

The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified by reference to data items such as: name, contact details, unique identification numbers, location data or online identifiers.

Special Categories of Personal Data

GDPR refers to sensitive data as 'special categories' of personal data. Special categories are: racial and ethnicity information, political or religious beliefs, trade-union membership, genetic and biometric data, health information and anything concerning an individual's sex life.

How Wilson James uses your information

Wilson James have a limited number of interactions directly with the general public, either through use of our public facing website or where our front-line staff come into contact with the public. During these interactions, Wilson James may collect personal data about you.

Wilson James will process – that means collect, store and use – the information you provide in a manner that is compatible with the GDPR. Wilson James will endeavour to keep your information accurate and up to date and not keep it for longer than is necessary. These retention rules are contained within a Document Control Standard Operating Procedure.

The aim is not to be intrusive and Wilson James will not ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure. These measures are described in the Wilson James Information Security Policy and the Data Protection Policy.

What information Wilson James may collect from you

Under the lawful basis of legal obligation, where there is a health and safety or security incident Wilson James may collect information from you as a party or a witness of the incident. Categories of the type of information Wilson James may need from you are:

- Personal information such as name, address and contact details
- A signed statement from you, about what you saw and heard
- Where there is any risk of injury, we may ask medical questions appropriate for the administration of first aid

A description of these legal obligations:

- To adhere to Health and Safety at work regulations and statutory reporting
- To provide information to Law Enforcement where required, if the incident relates to criminal behaviour
- To protect the vital interests of the public and of Wilson James employees by effectively understanding and mitigating health and safety hazards

Wilson James employees may also capture CCTV footage of the general public, through body cams, whilst operating security services at sensitive location such as Airports.

Wilson James also offer a LiveChat service through the public facing website. If you choose to use this service, your name and email address is captured. It is in the legitimate interests of Wilson James to be able to contact you about your enquiry and to be able to log complaints for audit and follow-up.

There is no automated decision making involved in the processing of information about the general public.

Disclosure of your personal data

With regard to witness statements, Wilson James may pass this data on to Law Enforcement agencies, and provide reports on security or health and safety incidents to our clients, where these events occur on client sites. These third parties are obliged to keep your details secure and use them only in relation to the management of such incidents. They will dispose of these details in line with the data retention requirements of Health and Safety regulations, which are embedded into Wilson James' retention policy.

Your rights

You have the right to access information held about you. You have a right to request a copy of the personal data you have provided, to be sent to you or other parties in machine readable format (data portability). Where there are any changes to the purposes for which your data is processed, or any changes to the way in which your personal data is disclosed, you have a right to be informed of these changes. Wilson James will do this by contacting you with the relevant information in a timely and transparent manner.

You have the right to ask for your personal data to be rectified where there is an inaccuracy and you have the right to ask for your personal data to be erased, where there is no overriding legal basis for it to be retained. You have the right to ask for your data not to be processed for marketing purposes and where any processing of personal data is carried out on the basis of your consent, you have the right to withdraw that consent as easily as it was given.

You have the right to object to decisions Wilson James has taken about the processing of your personal data and where you believe Wilson James has contravened the General Data Protection Regulations, you have the right to lodge a complaint with the Information Commissioner's Office.

You have the right to request that processing of your personal data is restricted, where there is an objection or request for rectification pending, or where you require data that would otherwise be deleted to be retained, for example for the defence of legal claims.

For any questions about, or to exercise any of your rights as a data subject, please contact dataprotection@wilsonjames.co.uk.