

# Paxton Access Ltd Privacy Policy

## 1. Scope

This privacy policy explains how we (Paxton Access Ltd) use any personal information we collect about you. We hold personal data about our customers, employees and suppliers (known as "data subjects") for a variety of business purposes and this falls within the scope of this policy and the requirements of the General Data Protection Regulation 2016 ('GDPR') effective from 25th May 2018.

### 2. Responsibilities

- **2.1** The company's board of directors and staff are fully committed to ensuring full compliance to this regulation.
- **2.2** The Data Protection Manager is responsible for ensuring that this privacy policy is delivered to the highest possible standard. Any questions, queries and complaints should be sent to the Data Protection Manager using the contact details provided below.

## 3. Privacy Policy

#### 3.1 Who are we?

At Paxton, we design and manufacture market leading IP access control, door entry and building intelligence systems for smart buildings. We also provide world class technical support and free training to ensure we consistently exceed our customers' expectations, supporting them and their businesses.

Paxton Access Ltd is a fully owned subsidiary of Paxton Access Group Ltd.

#### 3.2 Our Compliance Strategy

As a company, our compliance strategy for this regulation is achieved through a combination of Business Measures and Product Compliance:

#### **Business Measures**

We ensure that we have the necessary organisational and technological measures in place to deliver compliance:

• All our business processes are routinely audited to ensure they work to the highest possible standard.



- Before introducing any new processes, we will ensure measures are in place to fully protect any
  personal information processing and storage required. This will include using our IT infrastructure to
  achieve the highest level of data security.
- All Staff are trained to embed GDPR in our company's mindset and working culture.

#### **Product Compliance**

Our access control products provide features necessary for our customers to achieve compliance:

- Our systems are protected with password protection and operator rights, limiting the access to the data within the system. For the benefit of increased security, the systems can be set to automatically log out an operator if the system is inactive for an extended period.
- You can set the system to report on information held for an individual, as well as permanently delete a user and all associated information if requested.
- User activity in the system, in the form of events, can be deleted manually at any given point or a set timescale (i.e. 30 days) automatically. In the case of Paxton10, video records can also be deleted in the same way. Event information can be retained in the case of Net2 but can be anonymised. Net2 does not hold video data but any links to associated video can also be removed as part of the deletion of user information and events.
- Data security is achieved within the systems by the use of best practice methods and database structure.
- There are two new application notes relating to the security update within Net2 v5.04:

Net2 Security Settings – Data Protection and Strong Password Enforcement

#### Net2 Default System Engineer password – update

• We have made sure that our products will provide the tools required to allow compliance if used correctly, however, Paxton is not responsible for a user's compliance with GDPR and do not offer advice on how to be compliant.

#### 3.3 What information do we collect about you?

For customers we collect information about you such as name, email address and contact details when you place an order for products or services. This information is securely retained indefinitely on our system to provide ongoing product support and service. We also collect information when you voluntarily complete customer surveys, provide feedback and participate in competitions.

Website usage information is collected using cookies. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, in a few cases some of our website features may not function as a result.

#### 3.4 How will we use the information about you?



At Paxton, we take your privacy seriously and will only use your personal information to administer your account and to provide the products and services (like Support and Training) you have requested from us. This information will not be shared with any third-party.

#### 3.5 Customer Call Recording

We securely store call recordings, which may contain personal information such as your name, email address, contact details, token/fob information, and vehicle registration numbers. These recordings are managed in partnership with our phone service provider. We collect and process this information solely for the purpose of troubleshooting customer database faults, training and monitoring purposes. Under the UK General Data Protection regulation (UK GDPR), our lawful basis for processing this data is legitimate interest. We do not share your information with external organisations, however, we may share it internally for troubleshooting faults.

Call recordings are retained for a period of 131 days. After this duration, calls are automatically deleted from all systems and cannot be recovered.

#### 3.6 Webchat Service

We employ secure storage for webchats containing personal information such as your name, email address and contact details. This information is retained indefinitely by our phone service provider in compliance with UK GDPR regulations. Webchats can be promptly deleted upon customer request. Our retention of this information is solely for the purpose of addressing your query and we process it under the lawful basis of legitimate interest.

#### 3.7 Customer Consent

We only contact Customers about news about our products and services providing they have given us consent to do so. If you have given consent, you may opt out at any time by contacting us with the below.

#### 3.8 Access to your information and correction

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all your personal information, please contact us with using the details below. We may make a small charge for this service. We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate.

#### 3.9 Changes to our privacy policy

We keep our privacy policy under regular review and we will place any updates on this web page. This privacy policy was last updated on **31 October 2023**.

#### 3.10 How to contact us

By post: Alex Clements



Data Protection Manager

Paxton Access Ltd

Paxton House

Home Farm Road

Brighton, BN1 9HU

UK

By email: <u>privacyconsent@paxton.co.uk</u>