

Privacy policy

1. Introduction

- 1.1. AML Service Group Europe Limited is committed to safeguarding the privacy of our customers including website visitors in this policy, we explain how we will handle your personal data.
- 1.2. By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

2. How we use your personal data

- 2.1. In Section 2 we have set out:
 - 2.1.1. the general categories of personal data that we may process;
 - 2.1.2. in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
 - 2.1.3. the purposes for which we may process personal data; and
 - 2.1.4. the legal bases of the processing.

2.2. **USAGE DATA**

We may process data about your use of our website and services

The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use.

The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website.

The legal basis for this processing is your consent and our legitimate interests, namely monitoring and improving our website.

2.3. **ACCOUNT DATA**

We may process your account data.

The account data may include your name and email address, mobile number and address.

The source of the account data is you or in cases of commercial works, maybe your employer

The account data may be processed for the purposes of operating our business and providing you with services which you have requested

The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business as well as the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

2.4. **SERVICE DATA**

We may process the personal data you have provided in the course of the use of our services.

The service data may include products which you have purchased and/or services we have provided to you.

The source of the service data is you.

The service data may be processed for the purposes of operating our business and providing you with requested services from us.

The legal basis for this processing is our legitimate interests, namely the proper administration of our business and performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

2.5. **ENQUIRY DATA**

We may process information contained in any enquiry you submit to us regarding products and/or services.

The enquiry data may be processed for the purposes of responding to your enquiries for products and/or services.

The legal basis for this processing is our legitimate interests, namely the proper administration of our business and performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

2.6. **TRANSACTIONAL DATA**

We may process information relating to transactions, including purchases of goods and services, that you enter into with us.

The transaction data may include your contact details, your card details and the transaction details.

The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions.

The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely our interest in the proper administration of our and business.

2.7. **NOTIFICATION DATA**

We may process information that you provide to us for the purpose of

subscribing to our email notifications and/or newsletters.

The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters.

The legal basis for this processing is consent.

2.8. **CORRESPONDANCE DATA**

We may process information contained in or relating to any communication that you send to us.

The correspondence data may include the communication content and metadata associated with the communication when emailing us or when using the contact form on our website.

Email and Contact forms generate the metadata associated with communications made using the website contact forms.

The correspondence data may be processed for the purposes of communicating with you and record-keeping.

The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users

- 2.9. In addition to the specific purposes for which we may process your personal data set out in this Section 2, we may also process [any of your personal data] where such processing is necessary for compliance with a legal obligation to which we are subject, and/or in order to protect your vital interests or the vital interests of another natural person.
- 2.10. Please do not supply any other person's personal data to us, unless we prompt you to do so.

3. Providing your personal data to others

- 3.1. We do not disclose your personal data to any 3rd Parties, however, we do use cloud technology for the administration of our business and accounting systems. In this regard we use:
- 3.1.1. Microsoft 365 -
<https://privacy.microsoft.com/en-gb/privacystatement>
- 3.1.2. Xero Accounting
<https://www.xero.com/uk/about/legal/privacy/>
- 3.2. We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes.

3.3. We may disclose your name, address and contact number to our employees and where necessary to our subcontractors insofar as reasonably necessary for providing you with a service which you have requested.

3.3.1. Financial transactions are handled by our payment services providers, Xero Accounting. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services providers' privacy policies and practices at <https://www.xero.com/uk/about/legal/privacy/>

3.4. In addition to the specific disclosures of personal data set out in this Section 3, we may also disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

4. International transfers of your personal data

4.1. We do not transfer any data outside of the UK

5. Retaining and deleting personal data

5.1. Section 5 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

5.2. Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

5.3. We will retain and delete your personal data as follows:

5.3.1. Name & All contact details are kept on file while you are a customer and while your account is live.

5.3.2. When you close your account with us, all we keep is the model and the serial number of the alarm you have purchased along with the Engineer re-set code and Master code. These records are kept in Hard-copy ONLY.

5.3.3. Accounting / Transactional Data – we keep financial records in compliance with HMRC & Tax Legislation – this means this limited data will be held for 7-years.

5.3.4. On closing an account with us all your data will be returned to you and securely deleted from our systems.

5.4. Notwithstanding the other provisions of this Section 5, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

6. Amendments

- 6.1. We may update this policy from time to time by publishing a new version on our website.
- 6.2. You should check this page occasionally to ensure you are happy with any changes to this policy.
- 6.3. We may notify you of changes to this policy [by email or through the private messaging system on our website].

7. Your rights

- 7.1. You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:
 - 7.1.1. The first copy is free, subsequent copies may incur a small fee currently fixed at GBP 10 per copy; and
 - 7.1.2. the supply of appropriate evidence of your identity for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address.
- 7.2. We may withhold personal information that you request to the extent permitted by law.
- 7.3. You may instruct us at any time not to process your personal information for marketing purposes. You are also invited to unsubscribe from any email marketing materials at any time by using the unsubscribe link found in the footer of all our email marketing communications.
- 7.4. In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt-out of the use of your personal information for

8. About cookies

- 8.1. A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 8.2. Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 8.3. Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

9. Cookies that we use

- 9.1. We use cookies for the following purposes:
 - 9.1.1. analysis - we use cookies [to help us to analyse the use and performance of our website.
 - 9.1.2. cookie consent - we use cookies to store your preferences in relation to the use of cookies more generally

10. Cookies used by our service providers

- 10.1. Our service providers use cookies and those cookies may be stored on your computer when you visit our website.
- 10.2. We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at <https://www.google.com/policies/privacy>

11. Managing cookies

- 11.1. Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can, however, obtain up-to-date information about blocking and deleting cookies via these links:
 - 11.1.1. <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
 - 11.1.2. <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
 - 11.1.3. <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
 - 11.1.4. <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
 - 11.1.5. <https://support.apple.com/kb/PH21411> (Safari); and
 - 11.1.6. <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).
 - 11.1.7. *[additional list items]*
- 11.2. Blocking all cookies will have a negative impact upon the usability of many websites.
- 11.3. If you block cookies, you will not be able to use all the features on our website.

12. Our details

- 12.1. This website is owned and operated by AML Service Group Europe Limited
- 12.2. We are registered in [England and Wales] under registration number 11407429 and our registered office is at Suite 22, 10 Churchill Square, Kings Hill, West Malling, Kent, ME19 4YU
- 12.3. Our principal place of business is at Suite 22, 10 Churchill Square, Kings Hill, West Malling, Kent, ME19 4YU
- 12.4. You can contact us:
 - 12.4.1. [by post, using the postal address [given above]];
 - 12.4.2. [using our website contact form] www.amlservicegroup.com
 - 12.4.3. [by telephone, 0330 113 9229 or
 - 12.4.4. [by email, using info@amlservicegroup.com

13. Data protection officer

- 13.1. Our data protection officer's contact details are: Anna M Heim
Ares Risk Management – email:anna@aresriskmanagement.com