

DATA PROTECTION & GDPR POLICY

Company Name: Sinha Security Services Limited

Effective Date: 1 September 2026

Review Date: 1 September 2027

1. Introduction and Purpose

Sinha Security Services Limited is committed to protecting the privacy, confidentiality, and security of all personal data we process. As a provider of professional security services, we handle sensitive data relating to our employees, SIA-licensed guards, temporary staff, clients, and members of the public (via onsite security logs and CCTV monitoring).

This policy ensures that **Sinha Security Services Limited** complies with UK data protection legislation, specifically the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018 (DPA 2018)**.

2. Scope

This policy applies to all personal data collected, stored, and processed by us, regardless of whether it is held in paper format, electronically, or on mobile devices. It applies to all directors, managers, full-time employees, temporary workers, SIA operatives, and subcontractors.

3. Data Protection Principles

We process personal data in strict compliance with the core principles of the UK GDPR. All data must be:

- **Lawful, fair, and transparent:** Processed legally and openly.
- **Purpose limitation:** Collected only for specified, explicit, and legitimate business purposes (e.g., employment, vetting, vetting to BS 7858, operational deployment, or fulfilling client contracts).
- **Data minimisation:** Adequate, relevant, and limited to what is strictly necessary.
- **Accuracy:** Kept accurate and up to date.
- **Storage limitation:** Kept only as long as necessary for the purposes it was collected.
- **Integrity and confidentiality:** Processed securely using appropriate technical and organizational measures to prevent unauthorized access, loss, or damage.

4. Types of Data We Process

In the course of providing private security services, we process the following categories of data:

- **Staff and Guard Data:** Names, contact details, national insurance numbers, bank details (for direct wage payments), SIA licence status, Right to Work documentation, vetting check records, and emergency contact details.
- **Client and Business Data:** Contact names, business addresses, billing records, and operational site instructions.
- **Security Operational Data:** Guard patrol logs, incident report forms (IRFs), visitor sign-in sheets, and **CCTV/surveillance footage** captured on monitored client or company premises.

5. Security Sector Specific Safeguards

A. SIA & Vetting Records (BS 7858)

- Background checks, criminal record checks (DBS), and SIA license verifications are kept under strict access controls.
- Only authorized HR and management staff have access to vetting files.

B. CCTV & Operational Incident Logging

- CCTV footage and digital or physical incident reports are processed under the lawful basis of "legitimate interests" (for crime prevention, site safety, and evidence collection).
- Retention periods are strictly managed. Standard CCTV footage is overwritten automatically within **30 days** unless required for an active legal or police investigation.
- Physical notebooks (Incident Logs) must be stored securely when not in use on site.

6. Data Security Measures

We protect personal data through robust security protocols:

- **Digital Security:** Secure passwords, multi-factor authentication (MFA), encrypted cloud storage, and firewalls on all corporate computers.
- **Physical Security:** Locked filing cabinets for paper records and restricted access to our registered and operational offices.
- **Device Control:** No personal data or client site details may be downloaded onto unauthorized personal phones or tablets by security staff.



SINHA
SECURITY SERVICES LIMITED

SINHA SECURITY SERVICES LIMITED

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7. Individual Rights (Data Subject Access Requests)

Under UK law, individuals (including our guards and clients) have rights regarding their data, including the right to access their information, request correction, or ask for deletion.

- Any Individual who wishes to exercise their rights should submit a request to info@sinhasecurityservices.co.uk.
- We will verify the individual's identity and respond within the statutory **one calendar month** timeframe.

8. Data Breach Notification

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, or unauthorized disclosure of personal data.

- If a data breach occurs that poses a risk to individuals, **Sinha Security Services Limited** will notify the **Information Commissioner's Office (ICO)** within **72 hours** of becoming aware of it.
- Affected individuals will be notified without undue delay if the breach poses a high risk to their rights and freedoms.

9. Governance and Review

The Board of Directors has overall responsibility for ensuring compliance with this policy. This policy is reviewed annually.

Signed: _____

Date: _____

12/09/2026

Director, Sinha Security Services Limited

Version: 08; Page 3 of 3 Date: 01.09.2026