



Privacy Policy

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INTRODUCTION

All the information SIRE Technology Ltd collects about you may be combined to improve our communications and relationships with you and to develop products and services. SIRE Technology respects your right to privacy and this policy sets out what to expect when we collect personal information about you and how we will use your personal data.

This policy applies to information we collect from:

- Visitors to our website and social media accounts
- Customers and people who wish to engage in business with us
- Professional contacts and suppliers of products and services to us or our customers
- SIRE staff and their family members
- SIRE staff member's families including individuals under the age of 16 in relation to benefits
- Potential recruitment candidates

SIRE Technology is registered as a data controller with the ICO. We operate as a controller when conducting financial, contractual and commercial operations and as a data processor when hosting customers data on their behalf.

SIRE Technology will only process your personal data in accordance with this Privacy Policy unless otherwise required by applicable law.

THE INFORMATION WE COLLECT ABOUT YOU

For the purposes of this Privacy Policy, personal data means any information about an identifiable individual. Personal data excludes anonymous or de-identified data that is not associated with a particular individual. When you are an employee of SIRE Technology, do business with us, become a customer, register for or attend an event, subscribe to our newsletters or register an interest in any job vacancies with us, we collect some or all of the following personal information from you:

- Information we process on behalf of our customers (data controllers), pursuant of SIRE Technology's legitimate business interest
- Information we require from our suppliers and professional contacts in order to do business together
- Information we collect about you from other sources, such as social media, public and commercially available sources you in order to help us provide the required services or comply with our legal and regulatory obligations, in particular regarding anti-money laundering.
- When remotely connected we will collect IP addresses used for security and auditing purposes
- We do not collect sensitive information except where legally required as part of the recruitment process. Sensitive information includes data relating to race or ethnic origin, political opinions, religious or other similar beliefs, trade union membership, physical or mental health, sexual life or criminal records.

Information collected	Information used for	Information shared with	Duration of use
First and last name Telephone numbers Email address CV information	Processing an application for employment	UK based recruitment agencies	During recruitment process if unsuccessful During your employment at SIRE if successful
Financial information Previous 5-year employment if applicable Criminal convictions if any	BS7858 Screening part of our security arrangements Verifying your identity	UK based screening companies	During the screening process
First and last name Gender Date of Birth Postal Address Telephone numbers Email address National Insurance number Bank details Personality trades	Compliance with legal requirements whilst you are in employment with SIRE, paying you your wage and delivering our employee benefits Monitoring and self-improvement	HMRC UK based payroll and P11D service provider UK based personality assessment provider	During your employment at SIRE During your employment at SIRE
Next of kin first and last name Next of kin contact numbers	Contacting your next of kin in case of emergency	N/A	During your employment at SIRE
Medical information of staff member and family members where applicable	Application for adding to SIRE's private medical insurance	UK based employee benefit service provider UK based private medical insurance provider	Application form kept until confirmation applicant / applicant's family members have been successfully added to SIRE's private medical insurance
First and last name Postal address Gender Date of Birth Job title Salary information	Adding to SIRE's employee benefits	UK based employee benefit service provider	For the duration of cover

HOW WE WILL USE THE INFORMATION ABOUT YOU

We only process your personal data where applicable law permits or requires it, including where the processing is necessary for the performance of our employment contract with you, where the processing is necessary to comply with a legal obligation that applies to us as your employer, for our legitimate interests or the legitimate interests of third parties, to protect your vital interests, or with your consent if applicable law requires consent.

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We process this information to:

- Provide contractual / requested services to our customers
- Manage and improve the quality of our services
- Maintain our records for administrative purposes
- Comply with statutory and/or regulatory obligations
- To maintain a safe working environment for customers and staff members
- Provide you with updates to relevant events or information which you may find useful

We will only process your personal data for the purposes we collected it for or for compatible purposes. If we need to process your personal data for an incompatible purpose, we will provide notice to you and, if required by law, seek your consent.

We may process your personal data without your knowledge or consent where required by applicable law or regulation.

You will not be subject to decisions based on automated data processing without your prior consent.

WHO WE SHARE YOUR INFORMATION WITH

We may share your information with:

- Third-party service providers who perform SIRE Technology business operations on our behalf
- Suppliers and manufacturer's for delivery of product, software or warranties
- Business associates and other professional advisers (where requested or under legitimate interest)
- Another company as part of a sale of a SIRE Technology brand
- Legal bodies to help protect and defend SIRE Technology (including enforcing our Terms and Conditions)
- Law and/or government authorities where required;
- Providers of SIRE Technology's employee benefits

You have the right not to provide personal information to SIRE Technology. This may mean SIRE Technology are not able to provide the services you request, or to tell you about other services offered by SIRE Technology.

We may also disclose your personal data for the following additional purposes where permitted or required by applicable law:

- To comply with legal obligations or valid legal processes such as search warrants or court orders. When we disclose your personal data to comply with a legal obligation or legal process, we will take reasonable steps to ensure that we only disclose the minimum personal data necessary for the specific purpose and circumstances.
- To protect the rights and property of SIRE Technology.
- During emergency situation or where necessary to protect the safety of persons.
- For additional purposes with your consent where such consent is required by law.

LINKS TO THIRD PARTY SITES AND SOCIAL MEDIA

SIRE Technology sites may include links to third party sites. SIRE Technology does not control these third-party sites, and we encourage you to read the privacy policy of every site you visit.

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SIRE Technology sites may also have “plugins” (such as the Facebook “Like” button) to third-party sites or offer login (such as log in with Facebook) through a third-party account. Third-party plugins and login features, including their loading, operation and use, are governed by the privacy policy and terms of the third-party providing them.

HOW WE PROTECT YOUR INFORMATION

We have implemented appropriate physical, technical and organisational security measures designed to secure your personal data against accidental loss and unauthorised access, use, alteration, or disclosure. In addition, we limit access to personal data to those employees, agents, contractors, and other third parties that have a legitimate business need for such access.

Being ISO27001 accredited means:

- We comply with UK data protection laws and take the security of all the data we hold seriously.
- Our staff are trained on data protection, confidentiality and security.
- All SIRE Technology employees have signed a confidentiality agreement and only authorised persons will have access to your personal data.
- Various organisational and technical security measures are in place to protect your personal data from loss, misuse, alteration or destruction
- Our security and privacy policies are reviewed regularly

Unfortunately, transmissions of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk.

DATA RETENTION

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal data to the extent we need to retain it to fulfil the purposes we collected it for, as required to satisfy any legal, accounting, reporting and regulatory obligations to which we are subject. Different retention periods apply for different types of data, however, we will normally hold your data no longer than seven years plus the current processing period.

Under some circumstances we may anonymise your personal data so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent. Once you are no longer an employee of the company, we will retain and securely destroy your personal data in accordance with applicable laws and regulations.

DATA TRANSFERS

We keep your data within the UK or countries with EU adequacy status.

YOUR RIGHTS

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your employment.

Under the GDPR and The Data Protection Act 2018 (DPA) you have several rights with regard to your personal data.

At any time, you:

- Can stop receiving promotional email or postal communications from SIRE Technology by following the instructions in those messages, or through this Privacy Notice.
- Have the right to review personal data SIRE Technology hold on you if this does not impact on other individual's rights and freedoms.
- Have the right to withdraw your consent for the processing of your personal data by SIRE Technology.
- Have the right to have your personal data erased (right to be forgotten). SIRE Technology will make every reasonable effort to remove any reference to your personal data if they have shared it with any 3rd party during their usual business processes.
- Have the right to have your personal data transferred to another company. SIRE Technology will make every reasonable effort to comply with your request.
- Have the right to raise any concerns to the processing or use of your personal data by SIRE Technology to an appropriate data protection authority.

Any such communication must be in writing.

DATA SUBJECT RIGHTS

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it. Applicable law may allow or require us to refuse to provide you with access to some or all of the personal data that we hold about you, or we have destroyed, [or] erased, [or made your personal data anonymous in accordance with our record retention obligations and practices]. If we cannot provide you with access to your personal data, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

COMPLAINTS

If you have any concerns over how we have used or are using your data, then please contact privacy@sire.co.uk in the first instance.

If you are still not satisfied that we have addressed your concerns adequately you have a right to lodge your complaint with the Information Commissioners Office, the details of which are available by visiting <https://ico.org.uk/>

CHANGES TO OUR PRIVACY POLICY

We reserve the right to modify or amend this privacy statement at any time and for any reason. Nothing contained herein creates or is intended to create a contract or agreement between us and any user visiting the website or providing identifying information of any kind.

COOKIES AND OTHER INFORMATION-GATHERING TECHNOLOGIES

For further details on how we use cookies please refer to our cookie policy.