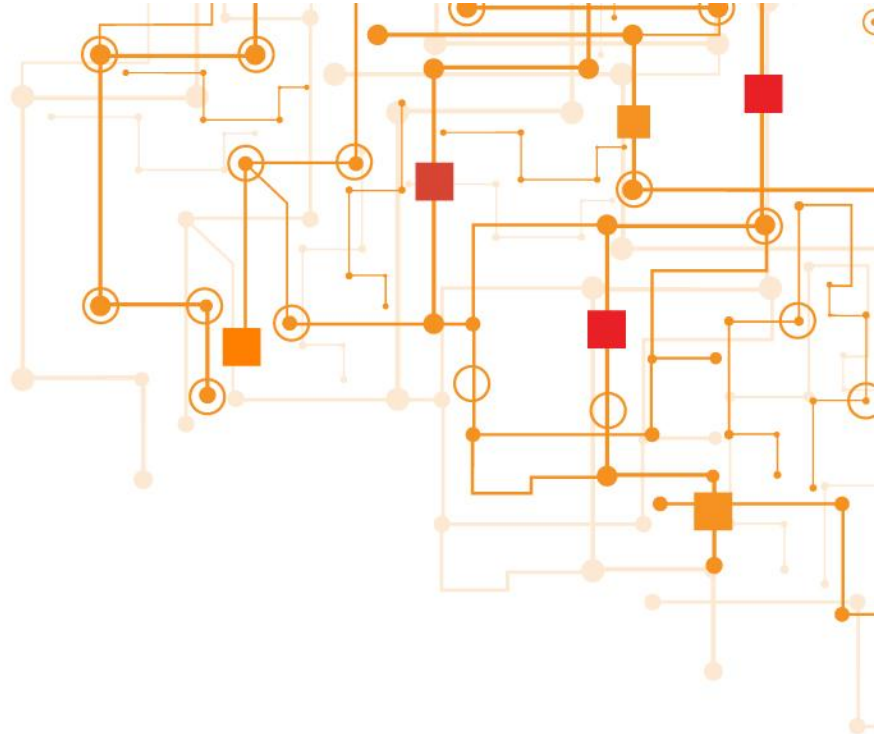




Privacy Policy.

Reference:	DAS-HR-POL-0019	Issue No.:	2026-1	Date of Issue	20/02/2026
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PRIVACY POLICY

1. INTRODUCTION

The Company is committed to protecting the privacy and security of personal data. This Master Privacy Policy explains how we collect, use, store, share and protect personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This policy applies to:

- Employees, workers, contractors, and former personnel
- Job applicants
- Website users and external contacts

Specific information relevant to each group is set out in:

- Annex A – Employee Privacy Notice
- Annex B – Website & External Privacy Notice

2. DATA CONTROLLER

For the purposes of the UK GDPR and the Data Protection Act 2018, the data controller is:

Alpine Fire Engineers Limited Registered Address: Hollins Brook Way, Little 66, Park, Bury, BL9 8RN

Email: info@alpinefire.co.uk

Telephone: 01617 914 500

The Company has appointed a Data Protection Lead to oversee compliance with data protection legislation. This role does not constitute a statutory Data Protection Officer under UK GDPR.

3. DATA PROTECTION PRINCIPLES

We process personal data in accordance with the following principles. Personal data must be:

- a) processed lawfully, fairly and transparently
- b) collected for specified, explicit and legitimate purposes
- c) adequate, relevant and limited to what is necessary
- d) accurate and, where necessary, kept up to date
- e) kept for no longer than necessary
- f) processed securely using appropriate technical and organisational measures
- g) transferred internationally only where appropriate safeguards are in place

4. LAWFUL BASES FOR PROCESSING

We only process personal data where a lawful basis applies, including:

- Performance of a contract
- Legal obligation
- Legitimate interests (where not overridden by individual rights)
- Vital interests
- Public task
- Consent (used sparingly and not generally relied upon in employment contexts)

Further detail is provided in the annexes.

We will always identify and document the specific purpose and lawful basis for processing personal data at the point it is collected, and this information will be made available to individuals through the relevant privacy notice.

5. SPECIAL CATEGORY & CRIMINAL CONVICTION DATA

Where we process special category data (e.g. health, ethnicity) or criminal conviction data, we do so in accordance with:

- Articles 9 and 10 UK GDPR
- Schedule 1 of the Data Protection Act 2018
- An internal Appropriate Policy Document

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PRIVACY POLICY

Details are set out in Annex A.

6. DATA SHARING

Personal data may be shared internally where access is necessary for legitimate business purposes. We may also share data with trusted third parties such as:

- Payroll providers
- Pension administrators
- IT and system providers
- Professional advisers
- Regulators and law enforcement bodies where legally required

All third parties are required to implement appropriate security measures and process data in accordance with our instructions.

Where third parties process personal data on our behalf, appropriate written data processing agreements are in place in accordance with UK GDPR requirements.

7. INTERNATIONAL TRANSFERS

Where personal data is transferred outside the UK, we ensure appropriate safeguards are in place, including:

- UK adequacy regulations, or
- Standard contractual clauses, or
- Other lawful transfer mechanisms

8. DATA SECURITY

We take appropriate technical and organisational measures to protect personal data against:

- Unauthorised access
- Accidental loss
- Destruction or damage

Access to personal data is limited to those with a genuine business need.

9. DATA RETENTION

We retain personal data only for as long as necessary for the purposes for which it was collected, including statutory, contractual and regulatory requirements. Retention periods are detailed in Annex A and Annex B. The Company maintains a documented Data Retention Schedule setting out retention periods and review arrangements.

Data may be retained longer where required in connection with legal claims or investigations.

10. AUTOMATED DECISION-MAKING

We do not make decisions about individuals based solely on automated processing that produces legal or similarly significant effects.

Where automated processing is used, individuals have the right to:

- Obtain human intervention
- Express their point of view
- Contest the decision

We do not carry out profiling that produces legal or similarly significant effects on individuals.

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PRIVACY POLICY

11. **INDIVIDUAL RIGHTS**

Under UK GDPR, individuals have the right to:

- Be informed
- Access their personal data
- Rectification of inaccurate data
- Erasure (in certain circumstances)
- Restrict processing
- Data portability
- Object to processing
- Rights in relation to automated decision-making

Requests should be submitted in writing using the contact details above. We may request reasonable proof of identity before responding. Requests will be responded to free of charge and within one month, subject to lawful extensions. Requests may be refused or restricted where a lawful exemption applies, in accordance with UK GDPR.

12. **DATA BREACHES**

In the event of a personal data breach likely to result in a risk to individuals' rights and freedoms, we will:

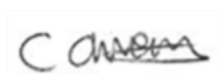
- Notify the Information Commissioner's Office (ICO) within 72 hours where required
- Notify affected individuals without undue delay where appropriate

13. **COMPLAINTS**

If you have concerns about how your data is processed, you may contact us using the details above. You also have the right to complain to the Information Commissioner's Office (ICO): Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
Tel: 0303 123 1113

14. **POLICY REVIEW**

This policy will be reviewed regularly and updated to reflect changes in law, guidance, or business practices.



C Owens
Group CEO
Date: 20/02/2026

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PRIVACY POLICY

ANNEX A – EMPLOYEE PRIVACY NOTICE

1. SCOPE

This notice applies to current and former employees, workers, contractors, and job applicants.

2. CATEGORIES OF EMPLOYEE DATA

- We may process the following data where relevant:
- Personal details (name, address, contact details, date of birth)
- Emergency contacts / next of kin
- Photographs
- Identification and right to work documents
- National Insurance number and tax information
- Bank details and payroll records
- Employment history, CVs, references
- Education and qualifications
- Salary, benefits, pension information
- Working hours, attendance, holiday and leave records
- Performance reviews, training records
- Disciplinary and grievance records
- Health information and reasonable adjustments
- Equality monitoring data (collected on a voluntary basis and used only in anonymized or aggregated form where possible)
- Criminal conviction data (where lawful and role-appropriate)
- CCTV footage
- IT usage logs, access card records

Monitoring is carried out proportionately for security, health and safety, compliance and business continuity purposes, and in accordance with applicable monitoring and surveillance guidance.

3. HOW WE COLLECT EMPLOYEE DATA

- Directly from you (applications, contracts, forms)
- Recruitment agencies and referees
- Occupational health providers
- Government bodies (HMRC, DWP)
- Internal systems (HR, payroll, IT)

4. LAWFUL BASES (EXAMPLES)

- Pay, benefits, contract administration: Performance of contract
- Tax, NI, statutory pay: Legal obligation
- Right to work checks: Legal obligation
- Equality monitoring: Substantial public interest
- Sickness absence & OH: Employment law obligations
- Disciplinary & grievance: Performance of contract
- Fraud prevention: Legitimate interests
- CCTV & IT security: Legitimate interests

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PRIVACY POLICY

5. **SPECIAL CATEGORY DATA**

We process special category data where necessary for:

- Employment law obligations
- Health and safety
- Equality and diversity monitoring
- Reasonable adjustments

We do not generally rely on consent in the employment context.

6. **CRIMINAL CONVICTION DATA**

Processed only where lawful, necessary, and proportionate, in accordance with Schedule 1 of the Data Protection Act 2018.

7. **RETENTION (EXAMPLES)**

- Personnel files: 6 years after employment ends
- Payroll & wage records: 6 years
- Right to work checks: Duration of employment + 2 years
- SSP / SMP records: As per statutory requirements
- CCTV footage: Typically, 30–90 days (unless required longer)

Retention periods may be extended where required to defend legal claims.

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PRIVACY POLICY

ANNEX B – WEBSITE & EXTERNAL PRIVACY NOTICE

1. SCOPE

This notice applies to:

- Website users
- Enquirers
- Clients and business contacts

2. DATA WE COLLECT

- Contact details provided via forms or email
- Correspondence records
- IP address and technical data
- Website usage and analytics data
- Marketing preferences (where applicable)

3. HOW WE USE WEBSITE DATA

- To respond to enquiries
- To provide requested services
- To administer and improve the website
- For security and fraud prevention
- For marketing communications (where lawful)

4. LAWFUL BASES

- Legitimate interests
- Performance of a contract
- Legal obligation
- Consent (for marketing and cookies where required)

5. COOKIES & ANALYTICS

Our website may use cookies and similar technologies. Further details are provided in our Cookie Policy. Users can manage cookie preferences through the website cookie banner or browser settings and may withdraw consent at any time.

6. RETENTION

Enquiry data: up to 12 months

Marketing communications: will only be sent where permitted by law, and individuals may opt out at any time using the unsubscribed link or by contacting us.

Analytics data: anonymised or retained per provider settings

7. YOUR RIGHTS

Website users have the same rights as set out in Section 11 of the Master Policy.

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