

GDPR and Privacy Policy

Safe & Secure Storage Limited General Data Protection Regulations (GDPR) and Privacy Policy.

- We are committed to protecting your personal data at all times.
- We never sell your data to any third parties.
- We use the lawful basis of legitimate interest when contacting you in relation to obtaining a storage price from us.
- We adhere to GDPR principles that your data shall be:
 - Processed lawfully, fairly and in a transparent manner;
 - Collected for specific, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
 - Adequate, relevant and limited to that which is necessary;
 - Accurate and where necessary, kept up to date;
 - Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the data is processed; and
 - Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and accidental loss, destruction or damage, using appropriate technical or organisational measures.

Our full Privacy Policy is below and explains in detail what information we collect about you, how we use and protect that information, how long we keep any information we have about you, how and when we will contact you and how you can exercise your privacy rights.

1. Introduction and General Terms

Safe & Secure Storage Ltd. is committed to protecting you and/or your company and your family's personal data when you are using our services. This Privacy Policy relates to our use of any personal data you provide to us as a customer. In order to provide you with our services, we may collect and process personal data about you. This privacy policy ("Privacy Policy") therefore explains the following:

- what personal data we may collect about you;
- how we will use the personal data we collect about you;
- the reason and lawful basis for Safe & Secure Storage using your personal data;
- when we may use your personal data to contact you;
- whether Safe & Secure Storage will disclose your personal data to anyone else;
- how long we will retain your personal data;
- your rights in respect of the personal data you have provided to Safe & Secure Storage Ltd;

As set out above, Safe & Secure Storage is committed to safeguarding your personal data.

Whenever you provide such information, we are legally obliged to use your information in line with all laws concerning the protection of personal data, including the Data Protection Act 1998 and, from 25 May 2018, the General Data Protection Regulation (these laws are referred to collectively in this Privacy Policy as the "**data protection laws**").

2. What information will Safe & Secure Storage collect about me?

When you request to receive a storage price from Safe & Secure Storage Ltd, become a storage customer, we will collect certain personal data about you.

Here are all of the different ways you can engage with Safe & Secure Storage and what information we collect about you for each one:

2.1 When obtaining a price for storage

If you are requesting a price through our website, in store or over the telephone, we collect the following personal data from you; your title, first name, surname, email address and postcode.

We also ask the type of customer you are (i.e. a domestic, business or student customer), when you want your storage to start and an approximation of how long you want the storage for. We ask the reason you need storage, for example moving home, decluttering, home improvements retail stock, commercial goods etc; and what storage room size you are obtaining a price for.

If you are a business and are requesting a storage price from us, we will also ask you the reason you need storage, for example, archiving, stock or as a distribution hub, as well as your relevant business sector and a URL for your business website (if you have one).

2.2 When making a storage reservation

If you are reserving a storage room or office with Safe & Secure Storage through the website, over the telephone or face to face in store, in addition to the information we have collected from you when obtaining a price (see above paragraph), we also collect your full postal address and ask if you would like extended hours access to your room.

2.3 When moving into storage, a flexi office or a vehicle parking space

When you are about to move into Safe & Secure Storage as a customer, we require additional personal information about you. This can be provided via our Online service or it can be provided in the store on the day of your actual move in.

This personal information includes: Your name, address, date of birth, a memorable word (so we can identify you at a later date if you call up having forgotten your room details), an emergency contact name, an emergency contact telephone number, and a summary inventory of what you are storing.

We will provide you a four digit PIN number which will identify you and allow you to access the storage areas.

When providing information about an emergency contact, we will assume you have obtained their consent to provide their personal data to Safe & Secure Storage Ltd. Please note any personal data supplied about your emergency contact will not be used for direct marketing purposes or shared/sold to third parties.

When you move in to your storage at Safe & Secure Storage, we will also ask you to provide a Passport or your Driving Licence with your photograph of you. This information is stored on your customer record and is used for security reasons, so we can identify you and keep proof on record.

2.4 When moving out of storage

The only additional information we ask for when you move out from Safe & Secure Storage, is your reason for leaving, confirm your address or your new forwarding address should you have one, in order to send you any refund of which you maybe entitled to.

3. How we will use your personal data?

Safe & Secure Storage will use your personal information for the following purposes:

3.1 When requesting an online price for storage and obtaining services in relation to that price:

- to provide you with an online price.
- to provide you with a copy of the price by email;
- to provide you with a copy of the price by text message (if requested)
- to contact you by telephone in order to discuss the price;
- to provide you with additional information in relation to your price.
- for compliance with legal, regulatory and other good governance obligations; and
- for administrative and any similar related purposes, including to ensure we have a record of your price, should you choose to order services at a later date.

3.2 When obtaining services following receipt of a price:

- to provide the requested services to you and receive payment for those services;
- to send you a reservation email and other details necessary for the services requested;
- to contact you by telephone to confirm any reservations made and to discuss the next steps
- to call, email and text a reserved customer to remind them to Check-in.
- to keep a record of your emergency/alternative contacts so that they can be contacted in accordance with paragraph 7, below;
- to keep a record of any information received via Check-in Online
- to provide information for storage insurance, and/or flexi office insurance
- for compliance with legal, regulatory and other good governance obligations;
- for administrative and any similar related purposes, or where we have a legal right or duty to use or disclose your information (including for crime and fraud prevention and related purposes).

3.3 When finalising your Move-out:

- to email you a notice to move out confirmation (this confirms your move out date) and instructions on the move out procedure
- to email you a final invoice and process any refund due

3.4 to contact you, on your request in regards to your user experience.

3.5 When contacting you to deal with any questions, comments or complaints you may have;

3.6 When requesting we recommend local removal companies to you

- Only with your consent, we will pass on your name, email and/or phone number, to one of our recommended removal companies the stores work with, who will contact you in regards to removal services.

3.7 When receiving and signing for a delivery for one of our customers in store.

- This will only be limited to the customer's name and storage room number and will be deleted after 12 months.

3.8 When using the Website generally:

- IP addresses are used to identify your location, the number of visits from different countries and also to block disruptive use;
- to analyse and improve the services offered on the Website e.g. to provide you with the most user-friendly navigation experience; and
- if you post or send offensive, inappropriate or objectionable content anywhere on or to the Website, or otherwise engage in any disruptive behaviour on safeandsecurestorage.co.uk, Safe & Secure Storage may use your personal information to stop such behaviour and, where we reasonably believe that you are or may be in breach of any of the laws of England or Wales (e.g. because content you have posted may be defamatory), Safe & Secure Storage may use your personal information to inform relevant third parties, including law enforcement agencies about the content and your behaviour.
- Inappropriate content within customer reviews will not be displayed on the Safe & Secure Storage website. This includes: off topic reviews not related to the service provided, content

that contains links to other websites, email addresses and telephone numbers, content that contains obscene, profane or offensive language, hate speech or any content that discriminates or is offensive to individuals or groups based on race, ethnic origin, religion, disability, gender, age, nationality, sexual orientation or gender identity.

- This list of processing activities and the personal data we process, may be updated from time to time. Where Safe & Secure Storage proposes using your personal information for any other uses we will ensure that we notify you first.

In addition to the above, we may convert your personal data into statistical or aggregated data in such a way as to ensure that you are not identified or identifiable from that data. We may use or share this anonymised aggregated data to conduct market research and analysis, including to produce statistical research and reports. For example, we may produce reports on which of our products and services are most popular.

4. What is the lawful basis for Safe & Secure Storage to use my personal data?

Except as described below, the processing of your personal data as set out above, is done on the lawful basis that it is necessary for the legitimate interests pursued by Safe & Secure Storage, which do not unfairly prejudice your rights and freedoms or personal legitimate interests

Our basis for processing your personal data is based on legitimate interests for the enquirer. Here are the reasons for using legitimate Interest:

4.1 85% of our new customers have never used self storage before. (source: YouGov survey April 2017)

4.2 As a consequence they misunderstand how much storage space they need to rent. For example, few people know what a 50 sq foot room looks like and how to use that space effectively.

4.3 Our YouGov commissioned survey April 2018 to 3,003 respondents revealed that 76% of people surveyed said they would find it helpful to have some professional advice in order to estimate the correct amount of storage space needed for their personal possessions.

4.4 In fact, a few of our customers moved into a different room size than they originally selected online to be quoted for, illustrating the need for professional advice on room size and space selection. (source: Big Yellow)

4.5 Enquirers will often pick a storage size too large for their requirements, therefore incurring them unnecessary additional costs, or too small for their requirements therefore incurring additional inconvenience on their move in day. Enquirers do not think about the height of the storage unit or how to pack and stack up a storage room efficiently.

4.6 Many people use self storage when they are going through key events in their lives. These are often stressful events such as moving home, divorce and separation, dealing with bereavement, starting a business, having building work or home improvements. We understand this and do not wish for our customers to have additional stress by arriving at the storage unit to find their room is not the right size.

4.7 Speaking with the potential customer at enquiry stage to understand their storage needs and make recommendations on the best storage size is therefore in the **legitimate interest** of our enquirers.

4.8 This is supported by ensuring our follow up contact is proportional and limited for a short period of time.

4.9 No personal data collected is ever used for any ongoing direct marketing by Safe & Secure Storage outside of the limited time after a storage enquiry has been made. Personal data is never exchanged or sold to third parties.

When we have a contract with you for services, some processing of your personal data (for example, ensuring that you receive the service) may also be on the lawful basis that it is necessary **to comply with our contractual obligations** to you, in respect of those services.

Where we send certain marketing communications to you (please see section 8, below), we are required to obtain **your consent**.

Should you choose to withhold or withdraw your consent, Safe & Secure Storage will not process the affected personal data.

Finally, the processing of your personal data for administrative and record keeping purposes will be based on our legitimate interest (as described above) but may also be necessary for compliance with our legal obligations laid down by European Union law (where relevant) and by English Laws applicable to us in the United Kingdom.

5. How does Safe & Secure Storage protect your information?

Safe & Secure Storage applies appropriate technical and organisational measures to protect your data against unauthorised or unlawful processing and against accidental loss or destruction of, or damage to, personal data and to comply with the data protection laws. These procedures include that we shall permit only authorised employees, who are trained in the proper handling of customer information, to have access to that information. Employees who violate our Privacy Policy are subject to our usual disciplinary procedures.

See section 9, How long will Safe & Secure Storage keep my personal information? for more details on when personal data is deleted.

6. When will Safe & Secure Storage contact me?

- In relation to an online price (as described in Section 3)
- In relation to the provision of any service you have signed up for, in order to ensure that we can deliver the services to you e.g. reserving a storage room
- In relation to moving out of your storage room, when you give notice and arranging your refund
- Invoices will only be sent upon request via email.
- Where you have opted-in to receive specific marketing correspondence (see Section 8)
- To invite you to participate in customer feedback surveys about our services (participation is always voluntary);
- We might also contact you in response to customer feedback you have presented to us. This could be as a response to a complaint, issue or feedback on our service.
- In relation to our customer surveys where you have requested us to contact you as a response to a complaint, an issue or feedback on our service.
- In the unlikely event of a break-in of an intruder on our premises. We will contact you by the means of a telephone call backed up by an email and by letter post, requesting you to attend our site and for you to check that your goods are in tact and not missing or damaged in any way.

7. When will Safe & Secure Storage contact my Emergency/Alternative Contacts?

Safe & Secure Storage may contact your emergency/alternative contacts:

- Where you have purchased services from Safe & Secure Storage and you cannot be contacted at the details provided by you in respect of those services (for example where the

storage period has expired but you have not reclaimed your items from storage); also as above section 6 last, paragraph and/or

- Where you have appointed us to disclose, discuss and provide access to your account details to deal with (as your agent), persons authorised by you in writing or otherwise identified by you to us as your alternative contact person(s), in accordance with, and to the extent of, your instructions.
- In providing emergency/alternative contact details, it is the customer's responsibility to inform those individuals they are doing so. This is made clear to the customer at the point that any emergency/alternative contact details are asked for either through our Check-In online process or face to face in the store.

8. Will Safe & Secure Storage share my personal information with anyone else?

We will keep your information confidential except where disclosure is required or permitted by law (for example to government bodies and law enforcement agencies).

Auction Houses & Intermediaries for the Sale of Goods

Should a customer become delinquent (failure to pay their invoices) and after our required reasonable time period, we are liable to retrieve the storage costs, in accordance with our Customer License and may pass the delinquent customer's possessions onto an auction house. This can also apply to the auctioning of Flexi Office contents and abandoned vehicles.

Recommended Removal Companies

Only with your request and consent do we pass on your name, email and/or phone number, to one of our recommended removal companies our stores work with, who will contact you in regard to removal services.

Insurance Companies

In the event of a customer claim, the insurance company which has provided the customer with the storage (or flexi-office) insurance for damage to their possessions will deal directly with the claimant. The claimant is responsible for providing all their necessary personal details with the insurer and any processing of your personal data by the insurer will be conducted in their capacity as an independent data controller. We therefore, recommend that you review their own privacy policy.

9. How long will Safe & Secure Storage keep my personal information?

Your personal data will not be kept for longer than is necessary to fulfil the specific purposes outlined in this Privacy Policy, and to allow us to comply with our legal requirements.

Any data we do hold onto will be anonymous. Any personally identifiable information such as your name, address, date of birth and telephone number will be deleted after a defined period.

The rest of the data is therefore anonymous and will be used to analyse general market and website trends but without an identifiable personal information.

For avoidance of doubt, here are the data retention periods for each of the circumstances where we would hold personal data:

9.1 When requesting a storage price (or Flexi office or vehicle parking price)

If you have requested an online price from us or over the telephone or in store, and we have created an enquirer record of you, we will delete your personal data 12 months after the date of your last contact with us.

9.2 When reserving storage (but you don't take up storage)

If you have reserved storage space with us, but never actually took it up, we will keep your personal data for 12 months from the date of your reservation.

9.3 When moving in and becoming a storage customer

If you moved in to storage, regardless of what period of time you moved in for, we will keep your personal data for the entire period you are a customer.

9.4 When moving out and becoming an ex-customer

We will keep your details for up to 7 years after you move out of our storage. Some personal information will be deleted earlier than this.

9.5 Retention for delinquent customers

A delinquent customer is one who has an outstanding payment with Safe & Secure Storage and who may no longer be able to be contacted. We will retain the personal data of delinquent customers for 7 years.

9.6 Retention in case of legal claims

We may retain your personal data for the period in which you might legally bring claims against us (in the UK this means we will retain it for 7 years) if and to the extent this is relevant; and

9.7 Retention in case of insurance claims

We may retain your personal data for the period in which you might legally bring claims against us (in the UK this means we will retain it for 7 years) if and to the extent this is relevant.

9.8 Retention in accordance with legal and regulatory requirements

We will consider whether we need to retain your personal data after the period of retention in the case of claims (above) because of a legal or regulatory requirement. Some or all of these criteria may be relevant to retention of your personal data collected in connection with our products and services.

9.9 Retention of customers who have opted in to receive marketing communications

We will delete all personal details including email addresses of customers who have opted in to receive ongoing marketing communications from Safe & Secure Storage after 10 years from the date they opted in, and who haven't unsubscribed from such communications in that time frame.

9.10 Store visitor records

Any visitors to our stores who sign in will have their details deleted after 12 months.

9.11 When receiving and signing for a delivery for one of our customers in store.

This will only be limited to the customer's name and storage room number and will be deleted after 12 months.

10. What are my rights in relation to the personal data processed by Safe & Secure Storage?

You have the right to request access to the personal data we hold about you. In order for us to comply with such a request, you will have to submit a Request . We may require you to prove your identity with two pieces of approved identification. We will respond to a Request within 30 days.

As well as the right to access the personal data Safe & Secure Storage holds about you, you have a number of other rights in respect of your personal data under the data protection laws. These may include (as relevant):

- the right to rectification, including to require us to correct inaccurate personal data;

- the right to request restriction of processing concerning you or to object to processing of your personal data;
- the right to request the erasure of your personal data where it is no longer necessary for us to retain it;
- the right to data portability including to obtain personal data in a commonly used machine readable format in certain circumstances such as where our processing of it is based on a consent;
- the right to object to automated decision making including profiling (if any) that has a legal or significant effect on you as an individual;
- where you have an option to provide us with your personal data or not in connection with your use of our Website or in connection with any of our products or services, you have the right to be informed about the possible consequences of not giving it to us; and
- the right to withdraw your consent to any processing for which you have previously given that consent.

Should you wish to exercise any of your rights (or if you have questions about your rights), please address your request and/or questions to us.

11. CCTV

We have installed CCTV in all of our storage premises covering both internal areas & the exteriors of the buildings, including car parks. This is for the purpose of staff and public safety, building security, crime prevention/detection & for the security of our premises and our customers' possessions. We consider CCTV is a key selling point for self storage.

We have CCTV monitors in our store receptions which relay CCTV feeds from around the store. These monitors can be viewed by anyone in the store reception areas including Safe & Secure Storage employees, visitors and customers.

Customers and potential customers like to see the images on display to back up the assertions that the storage facility is being monitored by CCTV.

CCTV privacy notices are on display in the reception areas and other locations of the building and perimeter fencing and gates alerting people to the fact that CCTV is in use throughout the building. These signs provide details of who to contact for further information about the scheme.

Images captured on CCTV will not be kept for longer than necessary, typically this is up to 90 days and is then automatically overwritten. However on occasions there may be a need to keep images for longer, for example where an incident is being investigated.

CCTV footage is stored within Safe & Secure Storage can be viewed/reviewed by the following:-

- a. Store staff may view CCTV only within their own store location
- b. Our external security company.
- c. Our CCTV maintenance company

You have the right to view CCTV images of yourself which can be actioned by placing a Request directly with the store. We will only disclose images to other authorised bodies for the purposes stated above i.e. to aid a police investigation.

We operate CCTV and disclose in accordance with the codes of practice issued by the Information Commissioner and the Home Office.

12. Cookies Policy - Information Safe & Secure Storage website collects from you

What is a cookie?

A cookie is a small amount of data, which often includes a unique identifier that is sent to your computer or mobile phone (referred to here as a "device") browser from a website's computer and is stored on your device's hard drive. Each website can send its own cookie to your browser if your browser's preferences allow it, but (to protect your privacy) your browser only permits a website to access the cookies it has already sent to you, not the cookies sent to you by other sites. Many sites do this whenever a user visits their website in order to track online traffic flows.

Cookies record information about your online preferences and allow us to tailor the Websites to your interests. Users have the opportunity to set their devices to accept all cookies, to notify them when a cookie is issued, or not to receive cookies at any time. The last of these means that certain personalised services cannot then be provided to that user and accordingly you may not be able to take full advantage of all of the Website features. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences. During the course of any visit to Safe & Secure Storage, the pages you see, along with a cookie, are downloaded to your device. Many websites do this, because cookies enable website publishers to do useful things like find out whether the device (and probably its user) has visited the website before. This is done on a repeat visit by checking to see, and finding, the cookie left there on the last visit.

13. Do I have a right to complain about the processing of my personal data by Safe & Secure Storage Ltd.

Yes. If you would like to ask any questions or raise any concerns with the way in which we processes your personal data or complies with your legal rights under the data protection laws, please feel free to contact us in the first instance, using the contact details set out below.

Notwithstanding the above and without prejudice to any other administrative or judicial remedy you might have, you have the right to lodge a complaint with the UK's Information Commissioner's Office directly, if you consider that we have infringed applicable data protection laws when processing your personal data.

14. Contacting Safe & Secure Storage about this Privacy Policy

Questions or comments about this privacy policy are welcomed – please visit our Contact Us page for all the ways you can get in touch with us.

If you have any questions or comments about this Privacy Policy please contact;

Data Protection:

Safe & Secure Storage Ltd.

Sir Benfro House

Brunel Quay

Neyland Marina

Neyland

SA73 1PY

Or email us at: Info@safeandsecurestorage.co.uk