

# Paxton Access Ltd

## Privacy Policy

### 1. Scope

This privacy policy explains how we (Paxton Access Ltd) use any personal information we collect about you. We hold personal data about our customers, employees and suppliers (known as “data subjects”) for a variety of business purposes and this falls within the scope of this policy and the requirements of the General Data Protection Regulation 2016 (‘GDPR’) effective from 25th May 2018.

### 2. Responsibilities

**2.1** The company’s board of directors and staff are fully committed to ensuring full compliance to this regulation.

**2.2** The Data Protection Manager is responsible for ensuring that this privacy policy is delivered to the highest possible standard. Any questions, queries and complaints should be sent to the Data Protection Manager using the contact details provided below.

### 3. Privacy Policy

#### 3.1 Who are we?

At Paxton, we design and manufacture market leading IP access control, door entry and building intelligence systems for smart buildings. We also provide world class technical support and free training to ensure we consistently exceed our customers' expectations, supporting them and their businesses.

Paxton Access Ltd is a fully owned subsidiary of Paxton Access Group Ltd.

#### 3.2 Our Compliance Strategy

As a company, our compliance strategy for this regulation is achieved through a combination of Business Measures and Product Compliance:

##### **Business Measures**

We ensure that we have the necessary organisational and technological measures in place to deliver compliance:

- All our business processes are routinely audited to ensure they work to the highest possible standard.

- Before introducing any new processes, we will ensure measures are in place to fully protect any personal information processing and storage required. This will include using our IT infrastructure to achieve the highest level of data security.
- All Staff are trained to embed GDPR in our company's mindset and working culture.

## Product Compliance

Our access control products provide features necessary for our customers to achieve compliance:

- Our systems are protected with password protection and operator rights, limiting the access to the data within the system. For the benefit of increased security, the systems can be set to automatically log out an operator if the system is inactive for an extended period.
- You can set the system to report on information held for an individual, as well as permanently delete a user and all associated information if requested.
- User activity in the system, in the form of events, can be deleted manually at any given point or a set timescale (i.e. 30 days) automatically. In the case of Paxton10, video records can also be deleted in the same way. Event information can be retained in the case of Net2 but can be anonymised. Net2 does not hold video data but any links to associated video can also be removed as part of the deletion of user information and events.
- Data security is achieved within the systems by the use of best practice methods and database structure.
- There are two new application notes relating to the security update within Net2 v5.04:

[Net2 Security Settings – Data Protection and Strong Password Enforcement](#)

[Net2 Default System Engineer password – update](#)

- We have made sure that our products will provide the tools required to allow compliance if used correctly, however, Paxton is not responsible for a user's compliance with GDPR and do not offer advice on how to be compliant.

### 3.3 What information do we collect about you?

For customers we collect information about you such as name, email address and contact details when you place an order for products or services. This information is securely retained indefinitely on our system to provide ongoing product support and service. We also collect information when you voluntarily complete customer surveys, provide feedback and participate in competitions.

Website usage information is collected using cookies. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, in a few cases some of our website features may not function as a result.

### **3.4 How will we use the information about you?**

At Paxton, we take your privacy seriously and will only use your personal information to administer your account and to provide the products and services (like Support and Training) you have requested from us. This information will not be shared with any third-party.

### **3.5 Customer Call Recording**

We securely store call recordings, which may contain personal information such as your name, email address, contact details, token/fob information, and vehicle registration numbers. These recordings are managed in partnership with our phone service provider. We collect and process this information solely for the purpose of troubleshooting customer database faults, training and monitoring purposes.

Under the UK General Data Protection regulation (UK GDPR), our lawful basis for processing this data is legitimate interest. We do not share your information with external organisations, however, we may share it internally for troubleshooting faults.

Call recordings are retained for a period of 12 months. After this duration, calls are automatically deleted from all systems and cannot be recovered.

### **3.6 Webchat Service**

We employ secure storage for webchats containing personal information such as your name, email address and contact details. This information is retained indefinitely by our phone service provider in compliance with UK GDPR regulations. Webchats can be promptly deleted upon customer request. Our retention of this information is solely for the purpose of addressing your query and we process it under the lawful basis of legitimate interest.

### **3.7 Customer Consent**

We only contact Customers about news about our products and services providing they have given us consent to do so. If you have given consent, you may opt out at any time by contacting us with the below.

### **3.8 Access to your information and correction**

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all your personal information, please contact us with using the details below. We may make a small charge for this service. We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate.

### **3.9 Your right to erasure (right to be forgotten)**

You have the right to request the erasure of your personal data in certain circumstances. This right enables you to ask us to delete or remove your personal information where there is no compelling reason for its continued processing. You may request erasure when, for example, the data is no longer necessary for the purpose it was collected, you withdraw your consent (where consent is the legal basis), or you object to the processing and there are no overriding legitimate grounds for us to continue.

To exercise this right, please contact us using the details provided in the “How to contact us” section of this Privacy Policy. We will assess your request and respond in accordance with our legal obligations. Please note that in some cases, we may be unable to comply with your request for specific legal or regulatory reasons, which we will inform you of at the time of your request.

### 3.10 Who we share your personal data with

As part of our commitment to improving our systems and services, we are currently undertaking a migration to a new enterprise resource planning (ERP) system. This process involves the use of a trusted third-party service provider who assists us with the technical migration of data and systems.

We may share your personal data (such as your name, contact details, order history, and invoicing information) with this third-party integrator strictly for the purpose of facilitating the migration and ensuring continuity of service.

The third-party provider acts as a data processor on our behalf and is contractually bound to:

- Only use your data for the specified migration purposes
- Maintain appropriate technical and organisational security measures
- Ensure confidentiality and compliance with the UK General Data Protection Regulation (UK GDPR)
- We do not allow our third-party service providers to use your personal data for their own purposes

### 3.11 Legal basis for processing

We process and share your personal data on the basis of:

- Legitimate interest: to maintain and improve our systems and services
- Contractual necessity: to continue providing you with goods or services without disruption

### 3.12 Changes to our privacy policy

We keep our privacy policy under regular review and we will place any updates on this web page. This privacy policy was last updated on **9 July 2025**.

### 3.13 How to contact us

By post:                      Alex Clements  
Data Protection Manager  
Paxton Access Ltd  
Paxton House  
Home Farm Road  
Brighton, BN1 9HU  
UK

By email:                    [privacyconsent@paxton.co.uk](mailto:privacyconsent@paxton.co.uk)