

# DATA PROTECTION POLICY & PRIVACY POLICY

## Evensure Management Limited

Our Privacy Policy applies to all services offered by Evensure Management Limited (a company registered in England and Wales with company registration number 3260618 and whose registered office address is 40 Hogshill Street, Beaminster, Dorset, DT8 3AA).

### Collection of Information:

To the extent permissible under applicable law, we collect information about you and any other party whose details you provide to us when you:

- Make an application for employment with the Company. This includes information required to complete personal vetting in accordance with BS7858 (*'Vetting Of Personnel Within A Security Environment'*), such as previous employers, character referees and other third parties involved in your previous employment.
- Apply to use our services. This will include your name (including business name), address, email address and telephone number. We may also ask you to provide additional information about your business in order to tailor our service around your requirements.
- Place an order to use our services or enter into a contractual agreement. This will include your name (including business name), address, contact (including telephone number and email address) and invoice/banking details.
- Take part in surveys or access any other interactive processes linked to our service.
- Interact with us using social media.
- Contact us offline, for example by telephone, fax, SMS, email or post.

If you intend giving us personal information about someone else, you are responsible for ensuring that you comply with any obligation and consent obligations under applicable data protection laws.

In so far as required by applicable data protection laws, you must ensure that beforehand you have their explicit consent to do so and that you explain to them how we collect, use, disclose and retain their personal information or direct them to read our Privacy Notice.

### How We Use Your Information (Clients):

To the extent permissible under applicable law, we use your information to:

- Provide any information and/or services that you have requested
- Provide, maintain and protect our services
- Manage and administer your use of our services
- Manage our relationship with you (for example, customer services and support activities)
- Monitor, measure and improve our processes to provide a high-quality service to you
- Undertake internal auditing of our website, applications, systems and services to test and improve performance
- Provide you with any information that we are required to send you to comply with regulatory or legal obligations
- Detect, prevent, investigate or remediate, crime, illegal or prohibited activities or to otherwise protect our legal rights (including liaison with regulators and law enforcement agencies for these purposes)
- Contact you to see if you would like to take part in our customer research (for example,



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feedback on your use of our services)

- To monitor, carry out statistical analysis and benchmarking, provided that in such circumstances it is on an aggregated basis which will not be linked back to you or any living individual.
- To the extent permitted by applicable law, we retain information about you after the termination of any contract or other agreement. This information will be held and used for as long as permitted for legal, regulatory, fraud prevention and legitimate business purposes.

## How We Use Your Information (Clients) (Cont.):

We monitor and record our communications with you, including e-mails and phone conversations.

Information which we collect may then be used for training purposes, quality assurance, to record details about our website and services you enquire about, and in order to meet our legal and regulatory obligations generally.

## Sharing Your Information:

We may share your information with:

- Our service providers and business partners (including their sub-contractors) or third parties which process information on our behalf (e.g. payment processing providers and those organisations we engage to help us send communications to you) so that they may help us to provide you with the services you have requested.
- Third parties used to facilitate payment transactions, for example clearing systems, financial institutions and transaction beneficiaries;
- Third parties where you have a relationship with that third party and you have consented to us sending information (for example sub-contracted engineers)
- Credit reference and fraud prevention agencies
- Regulators to meet Evensure Management's legal and regulatory obligations
- Law enforcement agencies so that they may detect or prevent crime or prosecute offenders.
- Any third party in the context of actual or threatened legal proceedings, provided we can do so lawfully (for example in response to a court order)
- Any third party in order to meet our legal and regulatory obligations, including statutory or regulatory reporting or the detection or prevention of unlawful acts
- Government departments where reporting is mandatory under applicable law.
- We may share non-personally identifiable information about the use of our website, applications and services publicly or with third parties but this will not include information that can be used to identify you.

## How We Use Your Information (Employees):

It is necessary for the Company to hold, process and retain information provided by you, for the purpose of effectively managing your employment. This includes, but is not limited to, administering and maintaining personnel records, paying salary and other remuneration and benefits and assessing your suitability for assignments.

We may make such relevant personal data available to 'data processors' (these are business partners such as advisers and payroll administrators, regulatory authorities, potential future employers (for reasons of TUPE transfer), governmental or quasi-governmental organisations,

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training providers and vetting services.

All Evensure Management staff, whether permanent or temporary, must be aware of the requirements of GDPR when they collect or process data.

We monitor and record our communications with you, including e-mails and phone conversations; for quality and training purposes.

## **Your Information and Your Rights:**

If you are based within the EEA or within another jurisdiction having similar data protection laws, in certain circumstances you have the following rights:

- The right to be told how we use your information and obtain access to your information.
- The right to have your information rectified or erased or place restrictions on processing your information.
- The right to object to the processing of your information.

## **Your Information and Your Rights:**

- The right to have any information you provided to us on an automated basis returned to you in a structured, commonly used and machine-readable format, or sent directly to another company, where technically feasible (“data portability”).
- Where the processing of your information is based on your consent, the right to withdraw that consent subject to legal or contractual restrictions.
- The right to object to any decisions based on the automated processing of your personal data.
- The right to lodge a complaint with the supervisory authority responsible for data protection matters (e.g. in the UK, the Information Commissioner’s Office).

If we hold any information about you which is incorrect or if there are any changes to your details, please let us know by so that we can keep our records accurate and up to date.

If you withdraw your consent to the use of your personal information for purposes set out in our Privacy Notice, we may not be able to provide you with the level of service you require or manage your employment either effectively or at all.

We will retain your personal information for the duration of our business relationship and afterwards for as long as is necessary and relevant for our legitimate business purposes, in accordance with recommended statutory retention periods or as otherwise permitted by regulation.

Where we no longer need your personal information, we will dispose of it in a secure manner (without further notice to you).

## **Changes to our Privacy Policy:**

We may change our Privacy Policy from time to time. However, we will not reduce your rights under this Privacy Notice. We will always update this Privacy Policy on our website.

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## **Security and Storage of Information:**

We will keep your information secure by taking appropriate technical and organisational measures against its unauthorised or unlawful processing and against its accidental sharing, loss, destruction or damage. However, we cannot guarantee the security of information which is transmitted to our website or applications, or to other websites or applications via an internet or similar connection.

## **Transfers outside of the European Economic Area:**

Personal information in the European Union is protected by data protection laws but other countries do not necessarily protect your personal information in the same way.

Our website and some of our applications may also be hosted outside of the EEA (which means all the EU countries plus Norway, Iceland and Liechtenstein - "EEA") and this means that we may transfer any information which is submitted by you through the website or the application outside the EEA.

We take steps to ensure that where your information is transferred outside of the EEA by our service providers and hosting providers, appropriate measures and controls in place to protect that information in accordance with applicable data protection laws and regulations.

By using our website, products or services or by interacting with us in the ways described in this Privacy Notice, you consent to the transfer of your information outside the EEA in the circumstances set out in this Privacy Notice. If you do not want your information to be transferred outside the EEA you should not use our website, applications or services.

## **Other Sites and Social Media:**

If you follow a link from our website, application or service to another site or service, this notice will no longer apply. We are not responsible for the information handling practices of third party sites or services and we encourage you to read the privacy notices appearing on those sites or services.

Our websites, applications or services may enable you to share information with social media sites, or use social media sites to create your account or to connect your social media account. Those social media sites may automatically provide us with access to certain personal information retained by them about you (for example any content you have viewed). You should be able to manage your privacy settings from within your own third party social media account(s) to manage what personal information you enable us to access from that account.

## **Cookies, Analytics and Traffic Data:**

Cookies are small text files which are transferred from our websites, applications or services and stored on your device. We use cookies to help us provide you with a personalised service, and to help make our websites, applications and services better for you.

Our cookies may be session cookies (temporary cookies that identify and track users within our websites, applications or services which are deleted when you close your browser or leave your session in the application or service) or persistent cookies (cookies

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which enable our websites, applications or services to “remember” who you are and to remember your preferences within our websites, applications or services and which will stay on your computer or device after you close your browser or leave your session in the application or service). We use the following different types of cookies:

- **Strictly necessary cookies:**

These are cookies which are needed for our websites, applications or services to function properly, for example, these cookies allow you to access secure areas of our website or to remember what you have put into your shopping basket.

- **Functionality cookies:**

These cookies allow our websites, applications and services to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.

You will be able to configure your browser to restrict cookies or block all cookies if you wish.

**Further Information:**

If you have any queries about how we treat your information, the contents of this notice, your rights under local law, how to update your records or how to obtain a copy of the information that we hold about you, please contact our Data Protection Officer at Evensure Management Limited, Unit 16, Loseley Park, Guildford, Surrey, GU3 1HS.

F van Tubbergh  
**Director**