



The Group will be responsible and accountable for the processing and security of personal information about employees, customers, suppliers and other individuals

Scope

This Policy applies to all employees, officers, consultants and contractors of the Group and its subsidiaries. In addition this Policy also applies to all agents, representatives or other third party intermediaries providing services and retained by Group companies who manage, collect or otherwise carry out processing of personal data in connection with providing services to Group companies.

Responsible persons

The responsibility for monitoring adherence with the Data Protection Policy resides with the statutory directors of each Operating Unit, except where the Group are acting as the data controller in which case it will be the Group Company Secretary, as the Group's nominated Data Protection Officer.

Our Policy

All Group companies and individuals must adhere to the requirements of their country's data protection or equivalent privacy legislation. Each company must ensure that, where applicable, any formal registration requirements for the processing of personal data are regularly reviewed and kept up-to-date.

We will:

- treat personal information with respect and sensitivity and in accordance with any obligations of privacy;
- take disciplinary action against employees who are found to have violated any provision of this Policy which may lead to dismissal or termination of employment and, if appropriate, criminal proceedings;
- terminate business relationships with any agent or third party representative that violates any provision of this Policy.

Definitions

The Group has adopted the EU GDPR definition of personal data and processing for the purposes of this Policy.

Personal data is any information relating to an identified or identifiable natural person (a "data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

Processing means obtaining, recording or holding the information or data, or carrying out any operation or set of operations on the information or data, including: (a) organisation, adaptation or alteration; (b) retrieval, consultation or use; (c) disclosure, transmission, dissemination or otherwise making available the data; or (d) alignment, combination, blocking, erasure or destruction.



Rights of data subjects

Each Group Operating Unit must be able to respond to a data subject wishing to exercise their rights under applicable law. Each Operating Unit should have processes in place to ensure that rights can be exercised promptly and within any applicable statutory time limits.

How We Use Personal Data

We will:

- only collect or use personal data for Operating Unit business purposes;
- only process personal data in accordance with the relevant legal framework applicable to the data;
- ensure that individuals whose personal data we hold are aware as to the purpose such information will be used for;
- only share personal data in accordance with the relevant legal framework applicable to the data;
- keep personal data and information securely, whether it is held electronically or on paper and put in place processes to prevent unauthorised or accidental disclosure or loss;
- restrict access to personal data to those who need to know;
- ensure that personal data is accurate and up to date;
- delete or destroy personal data in accordance with the relevant legal framework and the Group's Data Retention Policy;
- ensure that individuals who handle personal data understand their responsibilities in terms of this Policy and any applicable legislation;

We will not:

- sell or trade personal data belonging to the Group to third party companies such as marketing companies;
- transfer personal data without adequate protection.

Regulator

Each Group Company must be aware of the powers of any regulator who has authority in their jurisdiction. All contact from the regulator must be escalated to the Group Company Secretary and no response must be given without the authority of the Group.

Where there is a requirement to report data breaches to any regulator, this should not be done without first escalating the matter to Hill & Smith PLC.



Data Security

All personal information must be securely held and reasonable controls must be in force to prevent unauthorised or accidental disclosure or loss, and/or inaccuracies in personal data. This includes the use of passwords, physical security measures and IT software and hardware security.

Personal data must be handled with care at all times and should not be left unattended or on view to unauthorised employees, agents, sub-contractors, or other parties at any time;

No personal data may be shared informally or outside or beyond the terms of any data sharing agreement or contract in place with an agent, sub-contractor, or other party working on behalf of the Company.

When any personal data is to be erased or otherwise disposed of for any reason (including where copies have been made and are no longer needed), it should be securely deleted and disposed of. For further information on the deletion and disposal of personal data, please refer to the Company's Data Retention Policy.

Individuals must comply with local IT user policies as well as the Group Code of Conduct.

Further Information

Sometimes you know what the right thing to do is but sometimes there is an element of doubt. If you are unsure then ask and remind yourself:

- Does it comply with the Policy and the Group Code of Business Conduct?
- Would I be embarrassed if anyone within or outside of the Company knew about the situation or my actions?
- Would I be happy to have my own personal data or information used in such a way?

Please read the following (accessible via the Group Resources section of the Group Intranet):

Group Code of Business Conduct

Please Speak To:

Your Line Manager/Human Resource Manager/Local Finance Director/Managing Director

Group Company Secretary
Tel: +44 (0)121 704 7430
Email: compliance@hsgroup.com