1. About this Policy

This policy explains when and why we collect personal information about our clients and staff, how we use it, and how we keep it secure and comply with access requirements in relation to it.

We reserve the right to amend this Data Privacy Policy from time to time without prior notice. You are advised to check our website <u>http://www.cordagegroup.co.uk/</u> regularly for any amendments .

We will always comply with the General Data Protection Regulation (**GDPR**) when dealing with personal data. Further details on the GDPR can be found at the website for the Information Commissioner (www.ico.gov.uk). For the purposes of the GDPR, we have both "controller" and "processor" roles as detailed below.

2. Who are we?

We are The Cordage Group. We can be contacted a

Unit 3, Broadbridge Business Centre, Delling Lane, Bosham, West Sussex, England, PO18 8NF

Tel: +44 (0) 1243 697707 / Email: enquiries@cordagegroup.co.uk

3. What information we collect and why.

Type of information	Purposes	Legal basis of processing
Information relating to our staff		Data Controller
Staff Member's name, address, telephone numbers, e-mail address(es).	Staff Member contact details.	Necessary to fulfill Cordage's obligations as an employer.
Staff Emergency contact details	Contacting next of kin in the event of emergency	Protecting the Member's vital interests and those of their dependants
Staff DHSS and HMRC information.	HR and Payroll	Necessary to fulfill Cordage's obligations as an employer.
Staff Bank Account details	Payroll.	Necessary to fulfill Cordage's obligations as an employer.
Information processed on behalf of our clients		Data Processor
Basic telephone or email information relating to	Estate Management.	Required to perform services for our clients -

people that need to be contacted.		who act as Data Controller.
Record of any key meetings or agreements	Estate Management.	Required to perform services for our clients – who act as Data Controller.

4. How we protect your personal data

We will not transfer personal data outside the EU.

We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction.

Please note however that where information is transmitted to us over the internet this can never be guaranteed to be 100% secure.

For any financial transactions we will use a recognised online secure payment system.

We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

5. Who else has access to the information you provide us?

We will never sell personal data. We will not share personal data with any third parties without prior consent (which you are free to withhold) except where required to do so by law or as set out in the table above or paragraph below.

We may pass your personal data to third parties who are service providers, agents and subcontractors to us for the purposes of completing tasks and providing services to you on our behalf (e.g. to communicate with you). However, we disclose only the personal data that is necessary for the third party to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes.

6. How long do we keep your information?

We will hold personal data on our systems for as long as that person is a Staff Member and for as long afterwards as is necessary to comply with our legal obligations. We will review personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing that personal data except that we will retain your personal data in an archived form in order to be able to comply with future legal obligations e.g. compliance with tax requirements and exemptions, and the establishment exercise or defence of legal claims. We securely destroy all financial information once we have used it and no longer need it.

6. Cookie Policy

A limited number of cookies are used to improve user experience, but we have not implemented cookies for the purpose of tracking any personal information.

7. Your rights

- 1. You have rights under the GDPR:
 - (a) to access personal data

(b) to be provided with information about how your personal data is processed

- (c) to have your personal data corrected
- (d) to have your personal data erased in certain circumstances
- (e) to object to or restrict how your personal data is processed

(f) to have your personal data transferred to yourself or to another business in certain circumstances.

2. You have the right to take any complaints about how we process your personal data to the Information Commissioner:

https://ico.org.uk/concerns/

0303 123 1113.

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

For more details, please address any questions, comments and requests regarding our data processing practices to our Data Protection Manager, Martin Bargent at <u>martin@cordagegroup.co.uk</u>