

POL-604 v1.0

DATA PROTECTION PRIVACY NOTICE (GENERAL)

Document Ref:	POL-604
Created By:	Arron Marsden (IT Director)
Approved By:	Sam Storer (Managing Director)
Release Date:	07/01/2021

SECTION 1

DATA PROTECTION PRIVACY NOTICE (GENERAL)

This notice explains what personal data (information) we hold about you, how we collect it, and how we use and may share information about your contact with us and after it ends. We are required to notify you of this information under data protection legislation. Please ensure that you read this notice (sometimes referred to as a 'privacy notice') and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

Who collects the information

8point8 ('Company') is a 'data controller' and gathers and uses certain information about you.

Data protection principles

We will comply with the data protection principles when gathering and using personal information, as set out in our data protection policy.

About the information we collect and hold

What information

We may collect the following information about you:

- Your name and contact details (ie work address, work and mobile phone numbers, email address)
- Information collected during any recruitment process that we retain;
- Details of your use of business-related social media, such as LinkedIn;
- Information about your employment (eg. role and organisation)

How we collect the information

We may collect this information from you, your employer, our employees, consultants and other professionals we may engage, automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, remote access systems, email and instant messaging systems, intranet and Internet facilities, telephones, voicemail, mobile phone records.

Why we collect the information and how we use it

We will typically collect and use this information for the following purposes (other purposes that may also apply are explained in our data register:

- for the performance of a contract with you, or to take steps to enter into a contract;
- for compliance with a legal obligation (eg our obligations to you under health safety legislation, and under statutory codes of practice, such as those issued by Acas);
- for the purposes of our legitimate interests or those of a third party (such as a benefits provider), but only if these are not overridden by your interests, rights or freedoms.
- because it is necessary for carrying out obligations or exercising rights in employment law;
- for reasons of substantial public interest (ie equality of opportunity or treatment, promoting or retaining racial and ethnic diversity at senior level, regulatory requirements); and
- to defend any legal claims that may be brought against us in connection with your employment, or to establish, bring or pursue any claim against you, eg to enforce post-termination restrictions; this will typically involve passing information on to our legal advisers, who will be subject to strict professional and contractual duties of confidentiality.

Further information on the monitoring we undertake in the workplace and how we do this is available on request.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any material changes to information we collect or to the purposes for which we collect and process it.

How we may share the information

We may also need to share some of the above categories of personal information with other parties, such as external contractors and our professional advisers and with potential purchasers of some or all of our business or on a re-structuring. Usually, information will be anonymised but this may not always be possible or proportionate. The recipient of the information will be bound by confidentiality obligations. We may also be required to share some personal information as required to comply with the law.

Where information may be held

Information may be held at our offices and those of our group companies, and third party agencies, service providers, representatives and agents as described above. We have security measures in place to seek to ensure that there is appropriate security for information we hold including those measures detailed in our data protection and similar policies.

How long we keep your information

We keep your information for no longer than is necessary for the purposes for which the personal information is processed. Further details on this are available in our document management policy.

Your right to object to us processing your information

Where our processing of your information is based solely on our legitimate interests (or those of a third party), you have the right to object to that processing if you give us specific reasons why you are objecting, which are based on your particular situation. If you object, we can no longer process your information unless we can demonstrate legitimate grounds for the processing, which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

Please contact Data Protection Officer if you wish to object in this way.

Your rights to correct and access your information and to ask for it to be erased

Please contact our Data Protection Officer (DPO) who can be contacted if (in accordance with applicable law) you would like to correct or request access to information that we hold relating to you or if you have any questions about this notice. You also have the right to ask our Data Protection Officer for some but not all of the information we hold and process to be erased (the 'right to be forgotten') in certain circumstances. Our Data Protection Officer will provide you with further information about the right to be forgotten, if you ask for it.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Data Protection Officer

Our data protection officer is:	Mr Barry Smith Quantum Resilience 20-22 Wenlock Road London N1 7GU Email: DPO@quantum-resilience.co.uk Tel: + 44(0)203 051 2030
---------------------------------	---

How to complain

We hope that our Data Protection Officer can resolve any query or concern you raise about our use of your information. If not, contact the Information Commissioner at ico.org.uk/concerns/ or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

SECTION 2

REVIEW OF THIS DOCUMENT

This document will be reviewed by the IT Director 12 months from the date of implementation and then every 12 months thereafter.

Version	Release Date	Release Notes	Author
1.0	07/01/2021	Initial Release Document	Arron Marsden