



## Fair Data Processing Notice (FDPN) (GDPR-compliant Privacy Notice)

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Document Revisions:

Additional text added at each document revision/publication is annotated by a superscript number indicating the revision.

Document Revision	Date:
(1)	24 <sup>th</sup> May 2018
(2)	25 <sup>th</sup> May 2018
(3)	
(4)	
(5)	
(6)	
(7)	
(8)	

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## 1. Introduction

Guardian Global Technologies Ltd ('Guardian') is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you, as an employee during and after your working relationship with us, and as a customer or supplier, on an on-going basis, in accordance with the General Data Protection Regulation (GDPR) and the UK's Data Protection Act 2018 (the 'Act 2018'). It applies to all employees, workers, customers, suppliers and contractors

Guardian is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice – by necessity it is long but we have tried to keep it as straight-forward as compliance with the legislation permits.

This notice does not form part of any contract, whether that be a contract of employment, or contract to provide goods or services.

We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you and which is outside the remit of this notice so that you are aware of how and why we are using such information. You should also read it in together with our Fair Data Processing Policy. This is available on our website ([www.ggtg.net](http://www.ggtg.net), Privacy->FDPP) or on request from our Data Protection Officer.

Guardian's Data Protection Officer is Iain Maxted. ([dpo@ggtg.net](mailto:dpo@ggtg.net) or +44 (0)1656 742100). In the DPO's absence responsibility is delegated to Emyr-Wyn Francis ([dpo@ggtg.net](mailto:dpo@ggtg.net) or +44 (0)1656 742100).



## 2. Categories of Personal Data

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). Guardian does not process any anonymous data.

There are "special categories" of more sensitive personal data which require a higher level of protection. Where Guardian processes special categories of data it is described in the relevant section of this document.

### 2.1. Employees and Sub-contractors

We may process the following categories of personal information about you:

- Recruitment information such as your application form and CV, references, qualifications, membership of any professional bodies and details of any pre-employment assessments;
- Your contact details and date of birth;
- The contact details for your emergency contacts;
- Your gender, marital status and family details;
- Information about your contract of employment (or services) including start and end dates of employment, roles and responsibilities, location, working hours, details of promotion, salary (including details of previous remuneration), pension, appraisals, benefits and holiday entitlement;
- Your bank details and information in relation to your tax status including your national insurance number, tax codes and other HMRC-related information;
- Your identification documents including passport and driving licence and information in relation to your immigration status and right to work for us including correspondence with the Home Office;
- Information relating to disciplinary or grievance investigations and proceedings involving you (whether or not you were the main subject of those proceedings);
- Information relating to your performance and behaviour at work;
- Information relating to your medical history and sickness record;
- Training and induction records;
- Electronic information in relation to your use of IT systems/swipe cards/telephone systems;
- Your images (whether captured on CCTV, by photograph or video);
- Expressions of wishes letters relating to your Death in Service benefits;
- information relating to any applications made by you for flexible working and/or parental leave whether accepted or not;



- Details of any loans offered to you by the company, whether accepted or not; and
- Any other category of personal data which we may notify you of from time to time.

We may also process the following "special categories" of more sensitive personal information about you:

- Your health, including information relating to any medical, health or travel insurance provided by the company;
- Any criminal convictions and offences.

## 2.2. Suppliers and Customers

We may process the following categories of personal information about you:

- Name;
- Work address;
- Work contact details including office and mobile telephone numbers and e-mail address;
- Personal contact details if separate work contact details (such as a work e-mail address) are not available;
- Location and role in your company;
- The person to whom you report and persons who report to you;
- Your images (whether captured on CCTV, by photograph or video).

We will not process any of the "special categories" of more sensitive personal information about you.

## 2.3. Shareholders and Non-Executive Directors

We may process the following categories of personal information about you:

- Name;
- Home address;
- Home and mobile telephone numbers;
- Personal e-mail address;
- Date of Birth;
- Other directorships held by you;



- Profession.

We will not process any of the "special categories" of more sensitive personal information about you.

## 2.4. Job Applicants

In connection with an application for work with us, we may process the following categories of personal information about you:

- The information you have provided to us in your curriculum vitae and covering letter;
- The information you have provided on our application form, including name, title, address, telephone number, personal email address, date of birth, gender, employment history and qualifications;
- Any information you provide to us during an interview;
- Information provided by your referees;
- Notes recording your interview(s) and the interviewer's opinion of your performance and suitability for the job.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions;
- Information about your health, including any medical condition, health and sickness records;
- Information about criminal convictions and offences.

## 2.5. Work Experience Applicants

In connection with an application for work experience with us, we may process the following categories of personal information about you:

- The information you have provided to us in your curriculum vitae and covering letter;
- The information you have provided on our application form, including name, title, address, telephone number, personal email address, date of birth, gender, employment history and qualifications;
- Information provided by you about your next of kin;





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- Any information you provide to us during an interview or conversation about your work experience placement;
- Information provided by your referees;
- Information provided by your school.

We will not process any of the "special categories" of more sensitive personal information about you.

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### 3. Legal Bases for Processing Data

#### 3.1. General

There are various legal bases on which we may process personal data about you without requiring your specific consent, some where your consent is required and Special Categories of personal data which require either your consent to our processing of it or, under very specific conditions, may be processed without your consent. For brevity, we do not list all the legal bases here (see [www.ico.org.uk](http://www.ico.org.uk) for an exhaustive list), only those we rely upon. These may be different for the different categories of Data Subject.

#### 3.2. Employees and sub-contractors

The legal bases on which we process personal data about employees and contractors is generally:

- i. To give effect to your contract of employment or contract for services; or
- ii. To comply with our legal obligations; or
- iii. That it is in our legitimate interests to do so.

We do not need your permission to process your information on this basis. However, after you leave the employment of Guardian, or your contract for services comes to an end, we will continue to process limited personal data on the legal basis (ii) above for a maximum period of seven years and may seek your consent to continue to process a further limited set of personal information about you. If you provide consent for us to do this, you may withdraw consent at any time by contacting our Data Protection Officer in writing. ([dpo@ggtg.net](mailto:dpo@ggtg.net)). See also s.8.

We may also process your data in the context of transferring a small subset of your data (e.g. name, e-mail address) to third countries in respect of which the European Commission (the 'Commission') has not made a finding of adequacy on the legal basis:

- i. That it is necessary for the performance of a contract made in your interests between the controller and another person.

We will use this legal basis to provide for the transfer of your name, company e-mail address and mobile telephone number to customers or suppliers in third (non-EU) countries and organisations which do not adhere to the requirements of the GDPR.

#### 3.3. Suppliers and Customers

The legal basis on which we process personal data about customers and suppliers is:

- i. To give effect to a contract; or



- ii. That it is in our legitimate interests to do so; or <sup>2</sup>
- iii. Consent.

If we process your data on the legal basis (i) above, it means we do so to give effect to contracts between us and your employer for the purchase or sale of goods or services.

If we do not have a purchase or sale contract in place with you or your employer but you or your employer has requested information, a quotation, a meeting of which a written record has been made or had other communication with us in connection with our or your business then we will process your personal data on the legal basis (ii) above. <sup>2</sup>

In rare cases where neither (i) nor (ii) apply, we may process your data on legal basis (iii) above meaning that we will request that you give specific consent to our processing of your personal data in accordance with this FDPN. Consent may be sought either electronically, via e-mail or our website, or on paper. If you give consent, you may withdraw your consent at any time by contacting our Data Protection Officer in writing (dpo@ggtg.net). (See also s.8).

### 3.4. Shareholders and Non-Executive Directors

The legal basis on which we process personal data about shareholders and non-executive directors is:

- i. To give effect to a contract; or
- ii. That it is in our legitimate interests to do so;

We will normally process personal data of non-executive directors on the legal basis (i) above and of share-holders on the legal basis of (ii) above. However we can process personal data on the basis of (ii) only if your interests and rights do not override ours. You have the right to challenge our legitimate interests and request that we stop this processing. However, if you do so we will not be able to keep you informed on matters which concern your share-holding and this may be to your significant detriment. See details of your rights in section 7 below.

### 3.5. Job Applicants

The legal basis on which we process personal data about applicants is:

- i. That it is in our legitimate interests to do so; or
- ii. Consent.

Generally we will process personal data about you on the basis that you have applied for a position with the company and it is therefore in our legitimate interests to do so. We will only



process special categories of personal data (see s.2.4) about you with your consent which we will specifically seek if necessary. If you do provide your consent you may withdraw it at any time by contacting Guardian's Data Protection Officer ([dpo@ggtg.net](mailto:dpo@ggtg.net)). See also s.8.

### 3.6. Work Experience Applicants

The legal basis on which we process personal data about applicants is:

- i. That it is necessary for our legitimate interests;

We will process personal data about you on the basis that you have applied to undertake work experience with us and it is therefore in our legitimate interests to do so. We will not process special categories of personal data (see s.2.4) about you.



## 4. Purpose of Processing Your Data

We will use your personal information only when the law allows us to. In general terms we will use your personal information in the following circumstances:

- Where we need to perform a contract we have entered into with you;
- Where we have entered into a contract with a third party which is in your interests;
- Where we need to comply with a legal obligation;
- Where you have given consent;
- To comply with the law;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override our interests.

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else's interests);
- Where it is needed in the public interest or for official purposes.

### 4.1. Employees

We need all the categories of information listed in s.2.1 primarily to allow us to perform our contract with you and to enable us to comply with our legal obligations. The purposes for which we will process your personal information are listed below.

- To decide whether to employ (or engage) you;
- To decide how much to pay you, and the other terms of your contract with us;
- To check you have the legal right to work for the company;
- To carry out the contract between us including, if applicable, its termination;
- Training you and reviewing your performance\*;
- To decide whether to promote you;
- To decide whether and how to manage your performance, absence or conduct\*;
- To carry out a disciplinary or grievance investigation or procedure in relation to you or someone else;
- To determine whether we need to make reasonable adjustments to your workplace or role because of your disability\*;
- To monitor diversity and equal opportunities\*;
- To monitor and protect the security (including network security) of the Company, of you, our other staff, customers and others;



- To monitor and protect the health and safety of you, our other staff, customers and third parties\*;
- To pay you and provide pension and other benefits in accordance with the contract between us\*;
- To pay tax and national insurance;
- To provide a reference upon request by another employer;
- To pay trade union subscriptions\*;
- To pay professional institution subscriptions;
- To monitor compliance by you, us and others with our policies and our contractual obligations\*;
- To comply with employment law, immigration law, health and safety law, tax law and all other laws which affect us\*;
- To answer questions from insurers in respect of any insurance policies which relate to you\*;
- To operate the business and plan for the future;
- To prevent and detect fraud or other criminal offences;
- To defend the Company in respect of any investigation or litigation and to comply with any court or tribunal orders for disclosure\*;
- To notify you of amendments to any of our published privacy documentation; and
- To notify you of any other purpose from time to time.

Some of the above grounds for processing will overlap and there may be several grounds which justify our processing of your personal information.

#### 4.1.1. Special Categories of Personal Information

"Special categories" of particularly sensitive personal information (marked with an asterisk above) require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent;
2. Where we need to carry out our legal obligations or exercise our rights in connection with your employment;
3. Where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme.



Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public. We may also process such information about employees or former employees in the course of legitimate business activities with the appropriate safeguards.

#### 4.1.2. Our obligations as an employer

We will use your particularly sensitive personal information in the following ways:

- We will use information relating to leave of absence, which may include sickness absence or family related leave, to comply with employment and other laws;
- We will use information about your physical or mental health, or disability status, or the results from any drug and alcohol testing programme to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence; to provide support and to administer benefits;
- We will use trade union membership information to pay trade union premiums, register the status of a protected employee and to comply with employment law obligations.

#### 4.1.3. Do we need your consent?

We do not need your consent if we process special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

#### 4.1.4. Information about criminal convictions

We will use information relating to criminal convictions only when the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our Fair Data Processing Policy.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.



We may also process such information about employees or former employees in the course of legitimate business activities with the appropriate safeguards

#### 4.1.5. Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

We will not use your personal data for direct marketing.

#### 4.2. Suppliers and Customers

We need all the categories of information listed in s.2.2 primarily to allow us to establish and maintain a business relationship with you or with the business for which you work or to enable us to comply with our legal obligations. The purposes for which we will process your personal information are listed below.

- To decide whether to do business with you/your company or employer;
- To decide how much to pay you, and the other terms of any contract between us;
- To carry out any contract between us including, if applicable, its termination;
- To decide which products to source from you or to supply to you;
- To contact you to obtain or provide information about products, including in the case of customers, contacting you by mail, e-mail, telephone or other messaging services to arrange meetings, demonstrations, provide product information, software updates, obtain feedback on products and resolve technical issues;
- To monitor and protect the security (including network security) of the Company, of you, our staff and third parties;
- To monitor and protect the health and safety of you, our staff and third parties;
- To settle accounts with your company and/or raise correct invoices for payment by your company;





- To monitor compliance by you, us and others with our policies and our contractual obligations and the law;
- To comply with employment law, immigration law, health and safety law, tax law and all other laws which affect us or you;
- To answer questions from insurers in respect of any insurance policies which relate to us;
- To operate the business and plan for the future;
- To prevent and detect fraud or other criminal offences;
- To defend the Company in respect of any investigation or litigation and to comply with any court or tribunal orders for disclosure;
- To notify you of amendments to any of our published privacy documentation; and
- To notify you of any other purpose from time to time.

#### 4.2.1. Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

#### 4.2.2. Maintenance of Personal Data

It is your responsibility to notify us when your personal data changes, including when you change businesses or employers. If you leave the employment of an organisation with which we do business (and therefore legal basis (i), section 3.3) no longer applies, it is your responsibility to notify us so that we can delete your personal information. If you move to another organisation with which we do business we may continue to process your personal data on the legal basis (i) above. If you move to an organisation with which we do not do business then we may seek your consent to continue to process your data.

#### 4.3. Shareholders and Non-Executive Directors

We need all the categories of information listed in s.2.3 primarily to allow us to comply with our obligations under the Companies Acts and to keep you informed of company performance. The purposes for which we will process your personal information are listed below:

- To comply with our obligations under the Companies Acts and other legislation;



- To keep you informed, as applicable, in relation to business operations and performance;
- To provide you with notices or contact you as required by our articles of association, Shareholder's Agreement or other regulation(s) to which we are subject;
- If applicable, to ensure that you are paid for services rendered;
- To maintain company and Companies House registers;
- To notify you of amendments to any of our published privacy documentation; and
- To notify you of any other purpose from time to time.

#### 4.3.1. Change of purpose

We will use your personal information only for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

We will not use your personal data for direct marketing.

#### 4.4. Job Applicants

We need all the categories of information listed in s.2.4 in general to allow us to evaluate your application and suitability for the role for which you have applied with Guardian or any other role available and to enable us to comply with our legal obligations. The purposes for which we will process your personal information are listed below.

- To arrange interviews with you;
- To decide whether to offer you employment at Guardian or any associated company;
- To take up references about you;
- To confirm your qualifications and experience;
- To enquire as to your sick leave history;
- To operate the business and plan for the future;
- To prevent and detect fraud or other criminal offences;
- To defend the Company in respect of any investigation or litigation and to comply with any court or tribunal orders for disclosure;



- To notify you of amendments to any of our published privacy documentation; and
- To notify you of any other purpose from time to time.

#### 4.4.1. Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so or, if appropriate, seek your consent to do so. If you do provide your consent, you may withdraw it at any time by contacting Guardian's Data Protection Officer ([dpo@ggtg.net](mailto:dpo@ggtg.net)). See also s.8.

#### 4.5. Work Experience Applicants

We need all the categories of information listed in s.2.5 in general to allow us to evaluate your application for work experience and to enable us to comply with our legal obligations. The purposes for which we will process your personal information are listed below.

- To arrange an interview with you (if we consider this appropriate);
- To decide whether to offer you a work experience placement at Guardian or any associated company;
- To decide in which department your work experience requirement would be best met;
- To evaluate the effectiveness of your work experience placement and how we can improve the effectiveness of future work experience placements.

#### 4.5.1. Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so or, if appropriate, seek your consent to do so. If you do provide your consent, you may withdraw it at any time by contacting Guardian's Data Protection Officer ([dpo@ggtg.net](mailto:dpo@ggtg.net)). See also s.8.



## 5. Third Party Processing (Employees Only)

### 5.1. Data sharing

We may have to share your data with third parties, including third-party service providers and other entities in the Guardian group. We require third parties to respect the security of your data and to treat it in accordance with the law. We may transfer your personal information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information to that provided by Guardian (However, see also s.3.2).

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

### 5.2. Third-party Service Providers

The following activities are carried out by third-party service providers and necessitate the sharing of your data with the following categories of service providers:

- IT support providers;
- Pension administrators;
- Insurers;
- Solicitors and other legal advisors;
- Accountants;
- HMRC;
- Companies House;
- Immigration authorities;
- Company doctor and/or other specialist support agencies;
- Drug and alcohol testing service providers;
- Medical and dental treatment plan providers;
- Company financial advisers.

#### 5.2.1. Third-party Security

All our third-party service providers, and other entities in the Guardian group, are required to take appropriate security measures to protect your personal information in line with our own policies. We do not allow our third-party service providers to use your personal data for their own purposes. We permit them to process your personal data only for specified purposes and in accordance with our instructions.



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### 5.3. Group Companies

We may share your personal information with other entities in the Guardian group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, or for system maintenance support and hosting of data.

### 5.4. Other third parties

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

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## 6. Retention Period of Personal Data

### 6.1. Employees

We will retain your personal information only for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any on-going legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Once you are no longer an employee, worker or contractor of the company we will retain and delete your personal information in accordance with our data retention policy and/or applicable laws and regulations.

For specific retention periods of various types of personal data, refer to Guardian's Fair Data Processing Policy which is available on request ([dpo@ggtg.net](mailto:dpo@ggtg.net)).

### 6.2. Customers and Suppliers

We will retain your personal information indefinitely, or until such time as you notify us that you are no longer connected with a business with which we have a relationship or, if applicable, you withdraw consent to our processing it by notifying our Data Protection Officer in writing ([dpo@ggtg.net](mailto:dpo@ggtg.net)). Even if you withdraw consent, we may retain your personal data if there is another legal basis on which we can do so, for example, to give effect to a contract between us and your company in connection with which we deem it in your interests to continue to process your data.

Once you have provided consent in accordance with the Act 2018 and GDPR requirements, if such consent is required, we do not have to refresh that consent.

### 6.3. Shareholders and Non-executive Directors

We will retain your personal information indefinitely while we have a legal basis on which to do so. If we process your data on the basis of our legitimate interests you may challenge that basis by notification to our Data Protection Officer in writing ([dpo@ggtg.net](mailto:dpo@ggtg.net)). We may continue to process your data if we are statutorily required to do so.



## 6.4. Job Applicants

We will retain your personal information only whilst the recruitment process is ongoing. Once the recruitment process is completed we will either transfer your data to the employee process, if you are offered (and accept) employment, destroy/delete your data or retain it with your consent in case another suitable opportunity arises. We may retain a limited set of data without your consent in order to comply with our legal obligations, for example in regards to equality and diversity legislation. If we do this we will retain it only for as long as necessary in order to comply with this legislation.

## 6.5. Work Experience Applicants

We will retain your personal information only until such time as your placement has completed and we have completed any evaluation of it.



## 7. Rights and Duties of a Data Subject

### 7.1. Your Duty to Inform us of Changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

### 7.2. Your Rights as a Data Subject

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "Subject Access Request" or SAR). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it;
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected;
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below);
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object if we are processing your personal information for direct marketing purposes;
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it;
- **Request the transfer** of your personal information to another party (but only if your data is being processed automatically).

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal





information to another party, please contact Guardian's Data Protection Officer in writing (dpo@ggtg.net).

### 7.3. Fees for Requests

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

### 7.4. Confirmation of Your Right to Access Data

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it. Please see our Fair Data Processing Policy for details on how we will comply with SAR's. This is available on request ([dpo@ggtg.net](mailto:dpo@ggtg.net)).



## **8. Right to Withdraw Consent**

If you have given consent to our processing your personal data, whether as an employee, contractor, supplier, customer or shareholder you may withdraw that consent at any time by notifying Guardian's Data Protection Officer in writing ([dpo@ggtg.net](mailto:dpo@ggtg.net)). Your personal data, to the extent that it is processed subject to your consent, will be deleted and any hardcopies destroyed. The DPO will acknowledge receipt of your request but is not required to confirm deletion/destruction of your personal data.

## **9. Right to Lodge a Complaint**

You have the right to make a complaint at any time in relation to Guardian's processing of your data. If you wish to make a complaint you should write to the Information Commissioner's Office (ICO – [www.ico.org.uk](http://www.ico.org.uk)), the UK supervisory authority for data protection issues.

## **10. Sources of Personal Data**

### **10.1. Employees and Sub-contractors**

We collect personal information about employees, workers and contactors through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies.

We will collect additional personal information in the course of job-related activities throughout the period of you working for us.

### **10.2. Customers and Suppliers**

We collect personal information about customers and suppliers when you provide it to us. We may also collect information from your company website, through public databases, credit reference agencies and from other businesses.



## 10.3. Shareholders and Non-executive Directors

We collect personal information about shareholders and non-executive directors from you when you become a shareholder or non-executive director.

## 10.4. Job Applicants

We will collect personal information through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies.

## 10.5. Work Experience Applicants

We will collect personal information directly from you and your educational establishment.

## 11. Obligation to Provide Information

### 11.1. Employees and Sub-contractors

In order for Guardian to carry out its responsibilities under the contract of employment or contract for services between us, it is necessary that you provide certain personal data. If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

### 11.2. Customers and Suppliers

There is no contractual obligation on customers or suppliers to provide Guardian with any personal information. However, if you fail to do so, do not provide consent, or later withdraw consent, we may not be able to carry out the terms of any contract into which we have entered with you or your organisation. We may not be able to supply you products or services which you or your organisation has ordered, or place orders with you to supply products or services to Guardian.



## 11.3. Shareholders and Non-executive directors

There is an obligation on non-executive directors to provide certain information to us for us to comply with our obligations under the Companies Acts. If you fail to provide such information we may not be able to comply with our legal obligations and you may be in breach of your duties as a director. We may also process other limited personal information about you on the basis of consent. If you do not provide this information, do not provide consent or later withdraw consent, we may not be able to fulfil our obligations under the Companies Acts, may not be able to keep you informed of the performance of the business and other matters of which you should rightfully be informed and you may be in breach of your duties as a director.

There is no contractual obligation on shareholders to provide personal information. However, if you do not we may not be able register your interests in the register of members, keep you informed of matters which are important to you as a shareholder and you may therefore, for example, forfeit your right to vote on resolutions proposed to shareholders.

## 11.4. Job Applicants

There is no obligation on job applicants to provide us with personal information; however, if you do not do so we will not be able to process your application and will not be able to offer you employment.

## 11.5. Work Experience Applicants

There is no obligation on work experience applicants to provide us with personal information; however, if you do not do so we will not be able to process your application and will not be able to offer you a placement.

## **12. Automated Decision Making and Profiling**

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

1. Where we have notified you of the decision and given you 21 days to request a reconsideration;



2. Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights;
3. In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

We **do not envisage** that any decisions will be taken about you using automated means; however, we will notify you in writing if this position changes.

### **13. Changes to this privacy notice**

We reserve the right to update this privacy notice at any time, and we will publish any updated policy on our website ([www.ggtg.net](http://www.ggtg.net)). We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact Guardian's Data Protection Officer ([dpo@ggtg.net](mailto:dpo@ggtg.net))