



LighthouseGRC

LighthouseGRC Limited
Privacy Policy

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Privacy Policy

1. Introduction

- 1.1 We are Lighthouse GRC Limited (referred to as Lighthouse, we, us and our in this Privacy Policy), a company incorporated in England with company registration number 14363343 and whose registered office address is 16 Great Queen Street, London WC2B 5DG.
- 1.2 The information set out in this Privacy Policy is provided to individuals whose personal data we process (you or your) as data controller, in compliance with our obligations under Articles 13 and 14 of the UK General Data Protection Regulation (GDPR).
- 1.3 To make this information clear, we have divided the data we receive into the following groups and corresponding Schedules, where each of which refers to: the particular category of information we collect and retain; from where we obtain the information from; the purpose and legal basis of processing and to whom we will (if applicable) disclose the information:

Schedule 1 Data about our customers, and all individuals in respect of whom we have acquired personal information in connection with any products or services offered by us (including directors, shareholders, consultants, employees or other personnel of our customers)

Schedule 2 Data about our suppliers and supplier personnel

Schedule 3 Data about individuals who apply for employment or work experience with us

Schedule 4 Data about our directors and staff, and former directors and staff and other individuals who spend time with us (such as consultants and secondees)

- 1.4 In addition to the above, individuals who interact with us in any of the above capacities should also refer to the following:

Schedule 5 Data collected about staff and visitors to our office

Schedule 6 Data collected about visitors of our website or mobile applications

2. Data controller details

- 2.1 We are the data controller in relation to the processing of the personal information that you provide to us. Our contact details are as follows:

2.1.1 Address: 16 Great Queen Street, London WC2B 5DG.

2.1.2 Email address: info@lighthousegru.uk (please include "Personal Data Request" in your subject heading to ensure it receives the correct attention).

3. How we collect your information

3.1 Generally, the information we hold about you comes from the way you engage with us, for example by doing any of the following:

3.1.1 providing us, or one of our partners, with information in the course of registering for and/or using our services;

3.1.2 taking part in surveys, posting on our message boards or blogs;

3.1.3 downloading information or participating in any other interactive areas that appear on our services;

3.1.4 providing us, or one of our partners, with information in the course of any marketing event;

3.1.5 interacting with us using social media;

3.1.6 if you are an employee or potential employee, as a result of you providing your CV and information directly to us or via a third party such as a recruiter; and/or

3.1.7 contacting us offline, for example by telephone, SMS, email or by post.

3.2 We may also obtain personal data about you as a result of a personal recommendation, from a company website, from your business card, from information you have uploaded to LinkedIn and from credit reference agencies and fraud prevention agencies.

4. International transfers

We will not transfer personal data relating to you to a country which is outside the UK and European Economic Area (EEA) unless:

4.1 the country or recipient is covered by an adequacy decision of the Commission under GDPR Article 45;

4.2 appropriate safeguards have been put in place which meet the requirements of GDPR Article 46 (for example using the UK's approved contractual clauses for transfers of personal data outside the UK and EEA); or

4.3 one of the derogations for specific situations under GDPR Article 49 is applicable to the transfer. These include (in summary):

4.3.1 the transfer is necessary to perform, or to form, a contract to which we are a party:

4.3.1.1 with you; or

4.3.1.2 with a third party where the contract is in your interests;

4.3.2 the transfer is necessary for the establishment, exercise or defence of legal claims;

4.3.3 you have provided your explicit consent to the transfer; or

4.3.4 the transfer is of a limited nature, and is necessary for the purpose of our compelling legitimate interests.

4.4 [With regards to transfers of data to our parent company Torque Software Holdings Pty Ltd, located in Australia, please note that we have implemented appropriate safeguards and have entered into an agreement which incorporates the UK's approved contractual clauses for transfers outside of the UK and EEA].

5. Retention of personal data

Our retention and deletion policy can be found here – please see Schedule 7.

6. Your rights in respect of your personal data

6.1 You have certain rights under existing data protection laws, including the right to (upon written request) access a copy of your personal data that we are processing. In accordance with the GDPR:

6.1.1 you will have the following rights:

6.1.1.1 right to access: the right to request certain information about, access to and copies of the personal information about you that we are holding (please note that you are entitled to request one copy of the personal information that we hold about you at no cost, but for any further copies, we reserve the right to charge a reasonable fee based on administration costs); and

6.1.1.2 right to rectification: the right to have your personal information rectified if it is inaccurate or incomplete; and

6.1.2 in certain circumstances, you will also have the following rights:

6.1.2.1 right to erasure/"right to be forgotten": the right to withdraw your consent to our processing of the data (if the legal basis for processing is based on your consent) and the right to request that we delete or erase your personal information from our systems (however, this will not apply if we are required to hold on to the information for compliance with any legal obligation or if we require the information to establish or defend any legal claim);

6.1.2.2 right to restriction of use of your information: the right to stop us from using your personal information or limit the way in which we can use it;

6.1.2.3 right to data portability: the right to request that we return any information you have provided in a structured, commonly used and machine-readable format, or that we send it directly to another company, where technically feasible; and

6.1.2.4 right to object: the right to object to our use of your personal information including where we use it for our legitimate interests or for marketing purposes.

6.2 Please note that if you withdraw your consent to the use of your personal information for purposes set out in our Privacy Policy, we may not be able to carry out our contractual obligations to you or provide you with access to all or certain parts of our services.

6.3 If you consider our use of your personal information to be unlawful, you have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office. Please see further information on their website: www.ico.org.uk.

7. Third party sites

Our website may contain links to other websites operated by third parties. Please we are not responsible for personal information that third parties collect, store and use through their website. You should always read the privacy policy of each website you visit carefully

8. Automatic decision making

We do not make decisions based solely on automated data processing, including profiling.

9. Security

9.1 We keep your information protected by taking appropriate technical and organisational measures to guard against unauthorised or unlawful processing, accidental loss, destruction or damage. For example:

9.1.1 where appropriate, data is encrypted when transiting on our system or stored on our databases;

9.1.2 we have implemented safeguards in relation to access and confidentiality in order to protect the information held within our systems; and

9.1.3 we frequently carry out risk assessments and audits to monitor and review threats and vulnerabilities to our systems to prevent fraud.

9.2 However, while we will do our best to protect your personal information, we cannot guarantee the security of your information which is transmitted via an internet or similar connection. It is important that all details of any username, password and/or other identification information created to access our servers are kept confidential by you and should not be disclosed to or shared with anyone.

10. Changes to this Privacy Policy

We may amend this Privacy Policy from time to time, for example to keep it up to date, to implement minor technical adjustments and improvements or to comply with legal requirements. We will always update this Privacy Policy on our website, so please try to read it when you visit the website (the "last updated" reference tells you when we last updated our Privacy Policy).

Last updated November 2022

Schedule 1

Data about our customers, and all individuals in respect of whom we have acquired personal information in connection with any products or services offered by us (including directors, shareholders, consultants, employees or other personnel of our customers)

What we collect:	We may use your information for the following purposes, based on the following legal grounds:	Recipients:
<ul style="list-style-type: none"> Contact details such as your name, home/work addresses, email address, landline/mobile phone or fax numbers. Employment information such as your position/title, employment history, professional specialisms and qualifications. 	<ul style="list-style-type: none"> If it is necessary for the performance of our contract or for the purposes of entering into a contract: for the purpose of negotiating and entering into contractual agreements with you, in the course of providing our services e.g. contacting individuals to obtain instructions and discuss work involved. If it is in our legitimate business interests to do so: for internal record keeping for administration purposes, for the purpose of communications in relation to establishing a customer relationship, obtaining evidence of identity of our customers, communications regarding our service and fees, for insight purposes (e.g. to analyse market trends and demographics, and develop the service which we offer to you or other individuals in the future) and sending information to you about products and services which we think may be of interest to you for marketing purposes. Compliance with a legal obligation: in order to prevent fraud or money laundering or to comply with any other legal or regulatory requirements. 	<p>How we share information</p> <p>Please note that personal information we are holding about you may be shared with and processed by:</p> <ul style="list-style-type: none"> any company within the Lighthouse group for the purposes set out in this Privacy Policy only (e.g. customer relationship management, software and service compatibility and improvements and to provide you with any information, applications, products or services that you have requested); regulators or other third parties for the purposes of monitoring and/or enforcing our compliance with any legal and regulatory obligations, including statutory or regulatory reporting or the detection or prevention of unlawful acts; credit reference and fraud prevention agencies; 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); other parties and/or their professional advisers involved in a matter where required as part of the conduct of the services;
<ul style="list-style-type: none"> Payment information such as bank details and transaction history. 	<ul style="list-style-type: none"> If it is necessary for the performance of our contract: for the purpose of making or receiving payments in the course of providing our services. If it is in our legitimate business interests to do so: for internal record keeping for administration purposes, for 	<ul style="list-style-type: none"> our own professional advisers and auditors for the purpose of seeking professional advice or to meet our audit responsibilities; our service providers and agents (including their subcontractors) or third parties which process information on our behalf (e.g. internet service and platform providers, our bank, payment

What we collect:	We may use your information for the following purposes, based on the following legal grounds:	Recipients:
	<p>the purpose of retaining evidence of payment transactions, for insight purposes (e.g. to analyse market trends and demographics in relation to our fees), for establishing our customers' ability to pay costs and to develop the service which we offer to you or other individuals in the future).</p> <ul style="list-style-type: none"> • Compliance with a legal obligation: in order to prevent fraud or money laundering or to comply with any other legal or regulatory requirements. 	<p>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 applications, products, services and information you have requested;</p> <ul style="list-style-type: none"> • third parties as part of the arrangements for any event for which you have expressed an interest in attending; • third parties for marketing purposes (with your consent), e.g. our partners and other third parties with whom we work and whose products or services we think will interest you; and
<ul style="list-style-type: none"> • Identification information contained in or provided to us as part of our customer ID checks. This includes details included in copy personal photo and ID documents we receive. 	<ul style="list-style-type: none"> • If it is our legitimate business interests to do so: for the purposes of obtaining evidence of identity of our customers and internal record keeping for administration purposes. • Compliance with a legal obligation: in order to prevent fraud or money laundering or to comply with any other legal or regulatory requirements. • Consent: if disclosing to other organisations where we cannot rely on any legal obligation to do so. 	<ul style="list-style-type: none"> • another organisation to whom we may transfer our agreement with you or if we sell or buy (or negotiate to sell or buy) our business or any of our assets (provided that adequate protections and safeguards are in place).

Schedule 2

Data about suppliers and supplier personnel

What we collect:	We may use your information for the following purposes, based on the following legal grounds:	Recipients:
<ul style="list-style-type: none"> • Contact details such as your name, home/work addresses, email address, landline/mobile phone or fax numbers. • Employment information such as your position/title, employment history, professional specialisms and qualifications. 	<ul style="list-style-type: none"> • If it is necessary for the performance of our contract or for the purposes of entering into a contract: for the purpose of negotiating and entering into contractual agreements with you, in the course of receiving services from you e.g. contacting individuals where we need to do so to provide instructions and discuss work involved. • If it is in our legitimate business interests to do so: for internal record keeping for administration purposes, for the purpose of communications in relation to establishing a supplier relationship, obtaining evidence of identity of our suppliers, communications regarding our service and fees, for insight purposes (e.g. to analyse market trends and demographics, and develop the service which we offer to you or other individuals in the future) and sending information to you about products and services which we think may be of interest to you for marketing purposes. • Compliance with a legal obligation: in order to prevent fraud or money laundering or to comply with any other legal or regulatory requirements. 	<p>How we share information</p> <p>Please note that personal information we are holding about you may be shared with and processed by:</p> <ul style="list-style-type: none"> • any company within the Lighthouse group for the purposes set out in this Privacy Policy only (e.g. for internal record keeping/administration purposes); • our clients, in the course of providing services for and/or performing our contractual obligations to clients; • regulators or other third parties for the purposes of monitoring and/or enforcing our compliance with any legal and regulatory obligations, including statutory or regulatory reporting or the detection or prevention of unlawful acts; • credit reference and fraud prevention agencies; • 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); • our own professional advisors and auditors for the purpose of seeking professional advice or to meet our audit responsibilities; • our service providers and agents (including their subcontractors) or third parties which process information on our behalf (e.g. internet service and platform providers, our bank, payment processing
<ul style="list-style-type: none"> • Payment information such as bank details and transaction history. 	<ul style="list-style-type: none"> • If it is necessary for the performance of our contract: for the purpose of making or receiving payments in the course of the supplier's services. • If it is in our legitimate business interests to do so: for the purpose of enquiring, requesting or purchasing goods or services, for internal record keeping for administration purposes, for the purpose of retaining evidence of payment transactions and for insight purposes (e.g. to analyse market trends and demographics in relation to our suppliers' fees). 	

What we collect:	We may use your information for the following purposes, based on the following legal grounds:	Recipients:
<ul style="list-style-type: none"> • Identification information contained in or provided to us as part of our supplier ID checks. This includes details included in copy personal photo and residential ID documents we receive. 	<ul style="list-style-type: none"> • Compliance with a legal obligation: in order to prevent fraud or money laundering or to comply with any other legal or regulatory requirements. • Compliance with a legal obligation: in order to prevent fraud or money laundering or to comply with any other legal or regulatory requirements. 	<ul style="list-style-type: none"> • providers); and • another organisation to whom we may transfer our agreement with you or if we sell or buy (or negotiate to sell or buy) our business or any of our assets (provided that adequate protections and safeguards are in place).

Schedule 3

Data about individuals who apply for employment or work experience with us

What we collect	We may use your information for the following purposes, based on the following legal grounds:	Recipients:
<ul style="list-style-type: none"> Contact details such as names, home and work addresses, landline/mobile phone or fax numbers, email addresses, previous addresses. 	<p>Our legitimate interest in processing such information for contacting individuals where we need to do so and for obtaining/verifying evidence of identity.</p>	<p>How we share information</p> <p>Please note that personal information we are holding about you may be shared with and processed by:</p> <ol style="list-style-type: none"> recruitment agencies to communicate offer details (if any); regulatory and law enforcement bodies, where required of us under any applicable law or regulation; and our service providers (such as data storage, typing, administrative support and audit).
<ul style="list-style-type: none"> Employment related history and qualifications information such as position/title, date of birth, employment history and CV, references from previous employees, professional specialisms, education and qualifications, salary and benefits, disciplinary record. 	<p>Our legitimate interest in processing such information for assessing their suitability for the role, or considering potential packages and offers.</p>	<p>How we share information</p> <p>Please note that personal information we are holding about you may be shared with and processed by:</p> <ol style="list-style-type: none"> recruitment agencies to communicate offer details (if any); and our service providers (such as data storage, typing, administrative support and audit).
<ul style="list-style-type: none"> Personal information such as professional and personal interests and languages spoken. 	<p>Our legitimate interest in processing such information for assessing their suitability for the role.</p>	
<ul style="list-style-type: none"> Information contained in or provided to us as part of our recruitment or take on process such as details included in copy personal photographs and residential ID documents we receive. Visa documentation (right to work in the relevant territory). 	<p>Our legitimate interest in processing such information for obtaining/verifying evidence of identity.</p> <p>Compliance with a legal obligation in order to confirm that the individual is entitled to work in the relevant territory</p>	<p>How we share information</p> <p>Please note that personal information we are holding about you may be shared with and processed by:</p> <ol style="list-style-type: none"> regulatory and law enforcement bodies, where required of us under any applicable law or regulation; and

What we collect	We may use your information for the following purposes, based on the following legal grounds:	Recipients:
	and for the purpose of security and prevention of crime.	2. our service providers (such as data storage, typing, administrative support and audit).
<ul style="list-style-type: none"> • “Special categories of information” such as: information about your race or ethnicity. • information about unspent convictions. 	<p>We will use such personal information in the following ways where it is necessary for the performance of our contract, to protect your vital interests, to comply with our legal obligations or where it is in our legitimate interests, and based on the following legal grounds under the Data Protection Act 2018:</p> <ul style="list-style-type: none"> • Pursuant to Schedule 1, Part 2(8) of the Data Protection Act 2018, we may use information about your race or national or ethnic origin, for the purpose of identifying or keeping under review the existence or absence of equality of opportunity or treatment. • Pursuant to Schedule 1, Part 1(1)(1) of the Data Protection Act 2018, we consider and process information about unspent convictions under our rights conferred by law in connection with employment (Exceptions Order to the Rehabilitation of Offenders Act 1974). <p>Consent: we do not need your consent if we use special categories of your</p>	<p>Please note that special categories of information will only be shared by us provided you have consented or if we are permitted to do so under any applicable law.</p>

What we collect	We may use your information for the following purposes, based on the following legal grounds:	Recipients:
	<p>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 or other personal data (such as if we need to disclose it to certain recipients). 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.</p>	

Schedule 4

Data about our directors and staff, consultants, secondees, those on work experience, temporary staff, former directors and staff, next of kin, spouses, beneficiaries

What we collect	We may use your information for the following purposes, based on the following legal grounds:	Recipients
<ul style="list-style-type: none"> Contact details (work) such as name, work address, landline/mobile phone or fax numbers, email address. Contact details (personal) and other personal information such as home address, landline/mobile phone number, email address, previous addresses, emergency contact details, date of birth, marital status, next of kin, spouse, beneficiaries' names and contact details. 	<ul style="list-style-type: none"> Necessary for the performance of our contract in our capacity as your employer. Necessary to protect the vital interests of the individual concerned for the purposes of security and prevention of crime. Our legitimate interest in processing such information (work contact details) for contacting individuals where we need to do so in the individual's capacity as employee, director or other member of staff. Our legitimate interest in processing such information (personal contact details) for the purpose of contacting individuals where we need to do so in the individual's capacity as employee, director/shareholder or other member of staff, in order to keep appropriate employment records, for obtaining/verifying evidence of identity or for contacting next of kin, spouses and beneficiaries if the circumstances require (such as in an emergency). Compliance with a legal obligation to comply with right to work legislation. 	<p>How we share information</p> <p>Please note that personal information we are holding about you may be shared with and processed by:</p> <ul style="list-style-type: none"> any company within the Lighthouse group for the purposes set out in this Privacy Policy only (e.g. to help us provide employee administration services); our customers; other professional advisers of our clients; other parties and/or their professional advisers involved during the course of services provided to our clients; regulators or other third parties for the purposes of monitoring and/or enforcing our compliance with any legal and regulatory obligations, including statutory or regulatory
<p>"Special categories of information" such as:</p> <ul style="list-style-type: none"> information about your race or ethnicity, religious beliefs, sexual orientation and political opinions; 	<p>We will use your particularly sensitive personal information in the following ways where it is necessary for the performance of our contract, to protect your vital interests, to comply with our legal obligations or where it is in our legitimate interests, and based on</p>	

What we collect	We may use your information for the following purposes, based on the following legal grounds:	Recipients
<ul style="list-style-type: none"> • information about your health, including any medical condition, health and sickness records such as details of any absences (other than holidays) from work including time on statutory parental leave and sick leave; • health data relating to your, spouse, children and/or other family members when added to our private healthcare scheme; • information about criminal convictions and offences. 	<p>the following legal grounds under the Data Protection Act 2018:</p> <ul style="list-style-type: none"> • Pursuant to Schedule 1, Part 1(1)(1) of the Data Protection Act 2018, we will use information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws. We will use information about your physical or mental health, or disability status, 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 and to administer benefits including statutory maternity pay and statutory sick pay. • Pursuant to Schedule 1, Part 2(8) of the Data Protection Act 2018, we may use information about your race or national or ethnic origin, for the purpose of identifying or keeping under review the existence or absence of equality of opportunity or treatment. • Pursuant to Schedule 1, Part 1(1)(1) of the Data Protection Act 2018, we consider and process information about unspent convictions under our rights conferred by law in connection with employment (Exceptions Order to the Rehabilitation of Offenders Act 1974). We will use information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws. We will also use information to administer benefits including statutory maternity pay, statutory sick pay and pensions. • Pursuant to Article 9(2)(h) GDPR, we will use information provided in health questionnaires to assess the working capacity of our employees/other members of staff • We do not need your consent if we use special categories of your personal information in accordance with our written policy 	<p>reporting or the detection or prevention of unlawful acts;</p> <ul style="list-style-type: none"> • credit reference and fraud prevention agencies; • 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); • other parties and/or their professional advisers involved in a matter where required as part of the conduct of the services; • our own professional advisers and auditors for the purpose of seeking professional advice or to meet our audit responsibilities; • our service providers and agents (including their subcontractors) or third parties which process information on our behalf (e.g. internet service and platform providers, data storage providers, typing service providers, administrative support, third party payroll processors, audit providers and our bank); • third party providers of benefits (such as childcare vouchers, life

What we collect	We may use your information for the following purposes, based on the following legal grounds:	Recipients
	<p>to carry out our legal obligations or exercise specific rights in the field of employment law.</p> <ul style="list-style-type: none"> In limited circumstances such as where we need to obtain medical records from your GP in the event of long-term sickness, we may approach you for your written consent to allow us to process certain particularly sensitive or other personal 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. 	<p>insurers, pension providers);</p> <ul style="list-style-type: none"> another organisation to whom we may transfer our agreement with you or if we sell or buy (or negotiate to sell or buy) our business or any of our assets (provided that adequate protections and safeguard are in place); and please note that special categories of information will only be disclosed provided you have consented or if we are permitted to do so under any applicable law. For example, with your consent, health data may be provided to medical professionals or third party providers of benefits such as life insurers.
<ul style="list-style-type: none"> Employment and performance related information such as position/title, date of birth, employment history and CV, references from previous employees, professional specialisms, education and qualifications, salary and benefits, disciplinary records, performance records, appraisals, performance feedback, interview notes, languages spoken, practising certificate details and caveats, professional indemnity information, working patterns (days worked and non-work days). 	<ul style="list-style-type: none"> Necessary for the performance of the employment contract in order to keep appropriate employment records and carry out our contractual obligations as employer. Our legitimate interest in processing such information in order to keep appropriate employment records, for assessing their continued suitability for their role and for planning progression. 	
<ul style="list-style-type: none"> Payment and financial information such as bank details, transaction history, salary and benefits, life insurance, pension related information, tax-related information, National Insurance number, payroll documentation (P45 / P60 / P11D). 	<ul style="list-style-type: none"> Necessary for the performance of the employment contract to pay or compensate the individual. Our legitimate interest in processing such information in order to keep appropriate employment records and to allow the individual to receive pension and other benefits. Consent in order to allow nominated family members or 	

What we collect	We may use your information for the following purposes, based on the following legal grounds:	Recipients
	beneficiaries to receive benefits or insurance funds.	
<ul style="list-style-type: none"> Information contained in or provided to us as part of our recruitment or take on process such as details included in copy personal photographs and residential ID documents we receive. Visa documentation (right to work in the relevant territory). 	<ul style="list-style-type: none"> Our legitimate interest in processing such information for obtaining/verifying evidence of identity. Compliance with a legal obligation in order to confirm that the individual is entitled to work in the relevant territory and for the purpose of security and prevention of crime. 	
<ul style="list-style-type: none"> DBS check (basic disclosure). 	<ul style="list-style-type: none"> Compliance with a legal obligation pursuant to Schedule 1, Part 1(1)(1)(a) of the Data Protection Act 2018 to satisfy our legal obligations as their employer or as the entity to which members belong and for security and prevention of crime purposes. 	
<ul style="list-style-type: none"> Monitoring information such as images via CCTV, entrance/exit dates/times, movement within the building via security card system. 	<ul style="list-style-type: none"> Our legitimate interest in maintaining a safe environment and in preventing and detecting crime. Necessary to protect the vital interests of the individual concerned: for security purposes and in order to maintain a safe environment. Compliance with a legal obligation: in order to prevent fraud or money laundering or to comply with any other legal or regulatory requirements. 	

Schedule 5

Data about visitors to our office

What we collect:	We may use your information for the following purposes, based on the following legal grounds:	Recipients:
<ul style="list-style-type: none">• Monitoring information such as images via CCTV, entrance/exit dates/times, movement within the building via security card system.• Dietary preferences (if catering is arranged).• Identification information provided to us. This may include details included in copy personal photo and ID documents we receive.	<ul style="list-style-type: none">• If it is in our legitimate business interests to do so: for security purposes and pursuant to our legitimate interest in maintaining a safe environment, for the purpose of confirming attendance/location of the individual, for determining contract performance (in the case of employees and suppliers), and for use where catering is arranged (in the case of dietary preferences).• Necessary to protect the vital interests of the individual concerned: for security purposes and in order to maintain a safe environment.• Compliance with a legal obligation: in order to prevent fraud or money laundering or to comply with any other legal or regulatory requirements.	<p>How we share information</p> <p>Please note that personal information we are holding about you may be shared with and processed by:</p> <ol style="list-style-type: none">1. building management and law enforcement authorities, or other regulators or other third parties for the purposes of monitoring and/or enforcing our compliance with any legal and regulatory obligations, including statutory or regulatory reporting or the detection or prevention of unlawful acts;2. the relevant individual's employer or agent; and3. external caterers (in the case of dietary preferences).

Schedule 6

Data about visitors to our website or mobile applications

What we collect:	We may use your information for the following purposes, based on the following legal grounds:	Recipients:
<ul style="list-style-type: none"> • Technical and device information/ social networks 	<ul style="list-style-type: none"> • If it is in our legitimate business interests to do so: we may use certain technical log data (such as your IP address) for research or statistical purposes; to analyse user traffic and for ensuring the proper administration of our site; for analytics and insight purposes e.g. to monitor market trends and demographics and to improve the user experience within our site; and to ensure that content from our site is presented in the most effective manner for you and for your computer or other device from which you access our site and/or the services we offer through the site. • Consent: for the purposes of advertising including via integrated social media functions. 	<p>How we share information</p> <p>Please note that personal information we are holding about you may be shared with and processed by:</p> <ul style="list-style-type: none"> • our service providers and agents (including their subcontractors) or third parties which process information on our behalf (e.g. internet service and data storage and security platform providers, our bank, 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 applications, products, services and information you have requested;
<ul style="list-style-type: none"> • Cookies (and other web-tracking technology) 	<ul style="list-style-type: none"> • We may use “cookies” and other anonymous web tracking technologies (such as “web beacon” and “pixel tags”) implemented by us or by third party service providers. A cookie is a small file of letters and numbers that is sent to your device when you visit our site, allowing our site to recognise your browser if you revisit it. Cookies may store your online preferences and other information about the interaction you make in the site. Please refer to our Cookie Policy for more information about the type of cookies used and how we use cookies/tracking technologies within our site. • Where we collect “essential” cookies we will rely on the legitimate interest ground. We will only collect and process “non-essential” where your consent has been obtained. 	<ul style="list-style-type: none"> • third party social media and advertising sites for marketing and advertising purposes where consent has been obtained; and • another organisation to whom we may transfer our agreement with you or if we sell or buy (or negotiate to sell or buy) our business or any of our assets (provided that adequate protections and safeguards are in place).

Schedule 7

Retention and deletion policy

Unless we are required or permitted by law to hold on to your information for a specific retention period, we may retain your information for the following purposes periods:

Category of personal data	Period for which personal data will be stored
<ul style="list-style-type: none"> Data about our clients, business contacts, and third parties involved in matters in relation to which we provide services to our clients. 	<p>Contracts and general correspondence (emails, post and other communications) obtained in the course of providing our services: Such information will be deleted at the end of the year or following completion of the services or termination or expiry of the contract with our client (whichever is sooner).</p> <p>Contact details for marketing purposes: Contact information relating to clients and contacts will be held for so long as we believe the information to remain accurate and the individual concerned remains a genuine connection of ours, or of one of our directors and staff. We have a programme for reviewing our contacts regularly, and removing any information which is considered to be out of date or no longer relevant.</p>
<ul style="list-style-type: none"> Data about our suppliers and supplier personnel. 	<p>Contracts and general correspondence (emails, post and other communications) obtained in the course of providing your services: Such information will be stored for 6 years following completion of the services or termination or expiry of your contract (whichever is later).</p>
<ul style="list-style-type: none"> Data about individuals who apply for employment or work experience with us. 	<p>Personal data obtained from employment or work experience applicants will be deleted after 1 year.</p>
<ul style="list-style-type: none"> Data about our directors and staff, former directors and staff and other individuals who spend time with us (such as consultants and secondees). 	<p>Human resources (HR) records will be destroyed 7 years following employment. For the purposes of administration this will be actioned annually in December of each year.</p> <p>Personal data stored in private workspaces created for members of HR (including for appraisals, promotion and probation reviews) will be deleted 7 years after creation.</p>
<ul style="list-style-type: none"> CCTV 	<p>CCTV information is destroyed after 1 month.</p>
<ul style="list-style-type: none"> Data about visitors of our websites 	<p>We will maintain records of your personal data for the statutory accounting period or as long as you remain:</p> <ul style="list-style-type: none"> a registered subscriber to our mailing list a registered user of our website

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1	1.0	15 th November 2022	Initial Concept	Hannah Burton