

Privacy Notice

From 25 May 2018, Nathan Associates London Ltd. data processing activities will be governed by the General Data Protection Regulation (Regulation (EU) 2016/679) ("GDPRs"). For the purpose of the GDPRs, we are the 'Data Controller' of all personal data obtained by us as set out in this Policy, because we ultimately determine how your personal data will be handled by us or our sub-contractors, who would be our 'Data Processors'.

If we handle your personal data then you are a "Data Subject". This means you have certain rights under the GDPRs in relation to how your personal data is processed, which are set out in this Policy

'Personal Data' is any information that can be used to identify you, including your name, e-mail address, IP address, or any other data that could reveal your physical, physiological, generic, mental, economic, cultural or social identity.

'Special Category Data' means information about you that is sensitive and includes your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data.

'Processing' includes collecting, storing, handling, sharing, transferring, accessing and deleting your personal information.

This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the GDPR. We encourage you to read this notice carefully, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information. It applies to all employees, volunteers, and contractors.

The kind of information we hold about you

We will collect, store, and use a variety of categories of personal information about you. Those categories are detailed in the Schedule to this notice. We may also collect, store and use "special categories" of more sensitive personal information.

How is your personal information collected?

We collect personal information about our employees through the application and recruitment process, usually 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 and/or other background credit agencies and the Disclosure and Barring Service. We will collect additional personal information in the course of job-related activities throughout the period of you working for us.

How we will use information about you

We will only use your personal information when the law allows us to for legitimate business interest or contractual necessity as detailed in the Schedule to this notice.

Situations in which we will use your personal information

There are a variety of situations in which we will use the information we collect about you and these are detailed in the Schedule to this notice. The information in the Schedule includes the use we make of particularly sensitive personal information. Where we use your personal information to pursue the legitimate interests of the business, we will only do so provided your interests and fundamental rights do not override those interests. Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you fail to provide personal information

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).

Do we need consent to use personal or special category information?

There are stringent restrictions on use of special category data. Individuals must give their explicit consent for us to process such data. 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.

Furthermore, if you choose to share Personal Data of other people (such as dependents) with us, it is your responsibility to collect such Personal Data in compliance with local legal requirements. For instance, you should inform such other people, whose Personal Data you provide to the Company, about the content of this Notice and obtain their consent (provided they are legally competent to give consent) for the use of that Personal Data by the Company as set out in this Notice (including transfer and disclosure).

Automated decision-making and profiling

We do not make automatic decisions or undertake automated decisions regarding individuals to evaluate certain information about an individual (profiling).

Why might we share your personal information with third parties?

We may have to share your data with third parties, including third-party service providers. We require third parties to respect the security of your data and to treat it in accordance with the law. 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 business interest in doing so.

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

Transfer of personal information outside the EU

Due to the nature of our operations, the Personal Data you provide to us may be transferred to or accessed by Nathan Associates companies and trusted third parties from countries outside the EU. As a result, your Personal Data may be processed

outside the country where you live if this is necessary for the fulfilment of the purposes described in this Notice.

To ensure that your Personal Data will be adequately handled in such circumstances, contractual clauses relating to the protection of personal and sensitive data are included in all sub-contracts. These clauses make your individual rights enforceable across the projects that Nathan Associates implements and across the organisations with whom we have entered into a contractual agreement.

There may be transfers of your Personal Data to trusted third parties or our clients based outside the EEA for the purposes of us providing our services to them and/or where we may be entering into a contract to provide our services. If this is the case, adequate procedures will be in place for the protection of your Personal Data, in line with our Data Protection Policy.

Data security

We have put in place security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business or legal need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality as set out in our IT and Data Protection Policy and in the contract.

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

Data retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 working relationship with us.

Your rights in connection with personal information

Under certain circumstances, the law grants you specific rights. These are summarised below. Please note that your rights may be limited and subject to restrictions in certain situations:

- Request access to your personal information (commonly known as a “data subject access request”). 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 where 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. 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 your line manager or Nathan point of contact.

Further guidance and advice on the above rights can be obtained from the ICO's website <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulationgdpr/individual-rights/>

Right to withdraw consent

In any circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact your line manager or Nathan point of contact. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information. If you have a concern about the way we are collecting or using your personal data, or if you would like to exercise any of the above rights, we ask that you raise your concern with us in the first instance by contacting your line manager or Nathan point of contact. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns> to raise any issues you have.

| Schedule | | | | |
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| Category of personal data | Disclosure Recipient | Purpose of processing | Legal basis | Retention duration |
| <p>Contact/bank details (name, address, Tel email/bank account details/ Passport or driver licence number/NI number/photograph)</p> <p>Personal Data regarding qualifications and career development</p> | <p>Staff involved in recruitment, project management or contracting or who supervise or are involved in the service provision and payroll functions/ pension providers/ Legal/HR advisors.</p> <p>Other parties in connection with corporate transactions and in connection with the performance of our contract with clients/prospective clients.</p> <p>Public and Governmental Authorities and regulators</p> | <p>To ensure correct and legal information under contract of employment and with legislative bodies such as HMRC.</p> <p>To enable payment of salary/wages/NI/tax/ pension contributions/ expenses</p> <p>To enable us to meet our contractual obligations in connection with corporate transactions and the performance of our contract with clients/prospective clients.</p> | <p>Necessary for the performance of a contract to which the data subject is a party</p> <p>Necessary for the legitimate interests of the organisation</p> | <p>Six years after contract termination/end</p> |
| <p>Disciplinary and grievance records</p> | <p>Staff or sub-contractors who may be involved in investigating and/or determining a grievance/disciplinary procedure/HR</p> | <p>To ensure employees have access to effective recourse if they have any concerns about their employment</p> | <p>Necessary for the performance of a contract to which the data subject is a party</p> | <p>Six years after contract termination/end</p> |

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| | | To take appropriate action in the event of any conduct or performance concerns | Necessary for the legitimate interests of the organisation | |
| Absence records (holiday and sickness) | Staff who supervise and/or may be involved in performance monitoring/payroll/ Legal/HR | To take appropriate action in the event of any conduct or performance concerns To maintain appropriate levels of conduct and performance | Necessary for the performance of a contract to which the data subject is a party. Necessary for the legitimate interests of the organisation | Six years after contract termination/end |
| Special category data | Disclosure Recipient | Purpose of processing | Legal basis | Retention duration |
| Medical information | Staff who may be involved in managing absence Payroll provider/HR/Legal | To ensure employees'/volunteers' legal rights are met To protect employees'/volunteers' health and safety To take appropriate action in the event of any concerns about an employee's attendance and/or health | Necessary for the performance of a contract to which the data subject is a party Necessary for compliance with a legal obligation Necessary for the legitimate interests of the organisation | Six years after contract termination/end |

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| | | To plan staffing levels and any necessary absence cover | | | |
| Criminal Information | Records | Staff who may be involved in recruitment, project management and contracting and/or supervision of data subject//Legal/HR Advisors/Disclosure and Barring Service/Police/Safeguarding Teams | To ensure legal rights and contractual terms are met To take appropriate action in the event of any concerns raised about an employee/volunteer | Necessary for the performance of a contract to which the data subject is a party Necessary for compliance with a legal obligation Necessary for the legitimate interests of the organisation | Six years after contract termination/end |