

CLIENT/SUPPLIER PRIVACY NOTICE

Introduction

eGroup (incorporating eBlast Limited, eClad Limited, eFab Limited and eTest Limited), is the controller of your personal information. We respect your privacy and are committed to protecting it.

Personal information means any information about you from which you can be identified, but it does not include information where your identity has been removed (anonymous data).

As the controller of personal information, we are responsible for how that data is managed. This Notice sets out how eGroup may collect, use and share information and describes:

- Principles of data protection;
- What information we collect about you;
- What our responsibilities to you are;
- How we may use and share the information we collect;
- Whether information has to be provided by you;
- Legal grounds for using personal information;
- The measures we have in place to protect and safely store the information we collect;
- Retention of the information we collect;
- Your choices and rights in respect of the information we hold;
- How to make a complaint; and
- Changes to our privacy policy.

You'll also find a note of defined words and terms at the end of this Notice.

Principles of Data Protection

As the 'controller' of your personal information, we have adopted the following principles to ensure that the personal information we hold about you is:

- Processed **fairly** and **lawfully** and with valid and informed **consent**;
- Obtained for specific and **lawful purposes**;
- Kept **accurate** and **up to date**;
- **Adequate, relevant** and **not excessive** in relation to the purposes for which it is used;
- **Not kept for longer than is necessary** for the purposes for which it is used;
- Processed **in accordance with the rights of individuals**;
- **Kept secure** to prevent unauthorised processing and accidental loss, damage or destruction; and

- Not transferred to any subsidiary or service provider appointed by CSD Scotland Limited where these core principles cannot be met.

What information do we collect about you?

Information collected by us

We collect personal information about you when you place an order for a service or purchase goods from us or you supply items to us. The information about you which we will collect may include:

- Organisation Name and Address (or where the client/supplier is an individual, that person's name and address)
- Contact Names, phone numbers and e-mail addresses
- VAT number
- Company or organisation Registration Number
- Bank Details
- Good supplied or services provided

When using our website, we collect standard internet log information including:

- IP address
- Details of the pages you visit
- General details about the type of computer or device that you are using

This is statistical information only which we collect in order to find out the numbers of visitors to our site and the pages they have visited. This information is collected in such a way that it is not used to identify individuals. Where we do collect personal information on the website, this will be made obvious to you through the relevant pages.

Please be aware that our website may provide you with links to other websites. If you follow a link to any other website please note they have their own privacy notices. We do not accept any responsibility or liability for the privacy and security practices of such third-party websites and your use as such is at your own risk.

What are our responsibilities to you?

As a data controller, we are responsible for ensuring our systems, processes, people and suppliers comply with data protection laws in relation to the information we handle.

All of our people must abide by this Notice when handling personal data and must take part in any required data protection training. Any breach will be taken seriously and may result in disciplinary action.

We currently have a Data Protection Leader to oversee our compliance with data protection laws and this Notice, and provide guidance and advice to CSD Scotland Limited and our people as required. Our Data Protection Leader will be responsible for reporting any failures to comply with the data protection legislation.

How we may use and share the information we collect

We may use the information we collect for the following purposes:

To ensure invoices and statements are issued for Services/Goods provided by us
To ensure that invoices received for items supplied are paid

If you are an existing client, we will only contact you by telephone, email or SMS with information similar to those which were the subject of a previous enquiry or sale to you. If you no longer want us to use your data in this way, please write to Christopher Noble, Data Protection Leader, eGroup, Tumulus Way, Midmill Industrial Estate, Kintore, Aberdeenshire AB51 0TG.

How we may share the information we collect

We will not share your personal data with other parties, except as set out below.

If the business of eGroup is sold or integrated with another business your details may also be disclosed to our advisors and any prospective purchasers and their advisors and will be passed on to the new owners of the business. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Notice.

We will not share, sell or trade your personal information with any other third party without your consent.

Whether information has to be provided by you

The provision of your personal information is necessary to enable us to provide services to you. Without this information, we will not be able to fulfil our legal and contractual obligations or provide services to you.

Legal grounds for using personal information

We rely on the following legal grounds to process personal information. Most commonly we will use your personal information in the following circumstances:

1. Where we need to perform a contract we have entered into with you. For example, if you are a supplier, we may need your personal details in order to pay you. If you are a client, we may need your personal details in order to perform services or in order to supply goods to you.
2. Where we need to comply with a legal obligation, including any legal, accounting, or reporting requirements.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. For example, we may use personal information for our marketing purposes.

The measures we have in place to protect and safely store the information we collect

The confidentiality and security of your information is of paramount importance to us. We have appropriate organisational and technical security measures in place to prevent personal information from being accidentally lost or accessed in an unauthorised way. However, no information system can be 100% secure. So, we cannot guarantee the absolute security of your information. We are not responsible for the security of information you transmit to us over networks that we do not control, including the internet and wireless networks.

We have taken appropriate steps to ensure that there are adequate procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Retention of the information we collect

We retain the information we collect for no longer than is reasonably necessary to fulfil the purposes for which we collect the information and to comply with our legal obligations.

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. In general, this will mean retaining personal information for so long as we have a contract with you and for a period of 6 years thereafter.

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.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Your choices and rights in respect of the information we hold

Personal data must be processed in line with individuals' rights, including the right to:

- Access your personal information and request a copy of it;
- Require us to correct any mistakes in your information which we hold;
- Require the erasure (i.e. deletion) of personal information concerning you, in certain situations. Please note that if you ask us to delete any of your personal information which we believe is necessary for us to comply with our contractual or legal obligations, we may no longer be able to provide care and support services to you;
- Opt out at any time to processing of personal information concerning you for direct marketing;
- Restrict our processing of your personal information in certain circumstances
- In limited circumstances, request the transfer of your personal information to another party.

If you would like a copy of some or all of your personal data, please write to us at:

Christopher Noble, Data Protection Leader, eGroup, Tumulus Way, Midmill Industrial Estate, Kintore, Aberdeenshire AB51 0TG.

How to make a complaint

If you have any queries concerning your personal information or any questions on our use of the information, please contact our Data Protection Leader, Christopher Noble at the address above.

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Changes to this privacy notice

We keep this Notice under regular review and we will notify you by posting notice of the changes in a clear and conspicuous manner on our website, www.theegroup.co.uk.

This Notice was last updated in September 2018.

More information

Detailed information about your rights under Data Protection legislation can be found on the website of the United Kingdom Information Commissioner, the address of which is (as at the date of this policy) www.ico.org.uk.

Defined words

In this Privacy Notice, the following terms have the following meanings:-

| | |
|---------------------------|---|
| "client" | any person or organisation to whom CSD Scotland Limited provides a service to; |
| "contact" | an individual who is a contact of CSD Scotland Limited including any client, any potential or former client, any supplier, any consultant, or any another professional advisor and any other contact of CSD Scotland Limited; |
| "data" | recorded information whether stored electronically, on a computer, or in certain paper-based filing systems; |
| "data controller" | a person who or organisation which determines how personal data is processed and for what purposes; |
| "data protection leader" | the person designated as the Data Protection Leader of CSD Scotland Limited |
| "data protection officer" | the person designated as the Data Protection Officer of CSD Scotland Limited from time to time; |
| "individual" or "you" | the person whose personal data is being collected, held or processed; |
| "personal data" | Information which relates to an individual and from which he or she can be identified either directly or indirectly through other data which CSD Scotland Limited has or is likely to have in its possession. These individuals are sometimes referred to as data subjects. |
| "our people" | Means clients, consultants, employees, temporary workers and those on work placements providing services to/working for CSD Scotland Limited; |
| "notice" | this Privacy Notice as amended from time to time; |
| "principles" | the core data protection principles set out in this Privacy Notice; |

| | |
|----------------------------------|---|
| "process" or "processing" | any activity that involves use of personal data, including: obtaining, recording or holding personal data, or carrying out any operation or set of operations on personal data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring personal data to third parties or allowing them access to it as set out in this Notice; |
|----------------------------------|---|

**Updated
1 September 2018**