

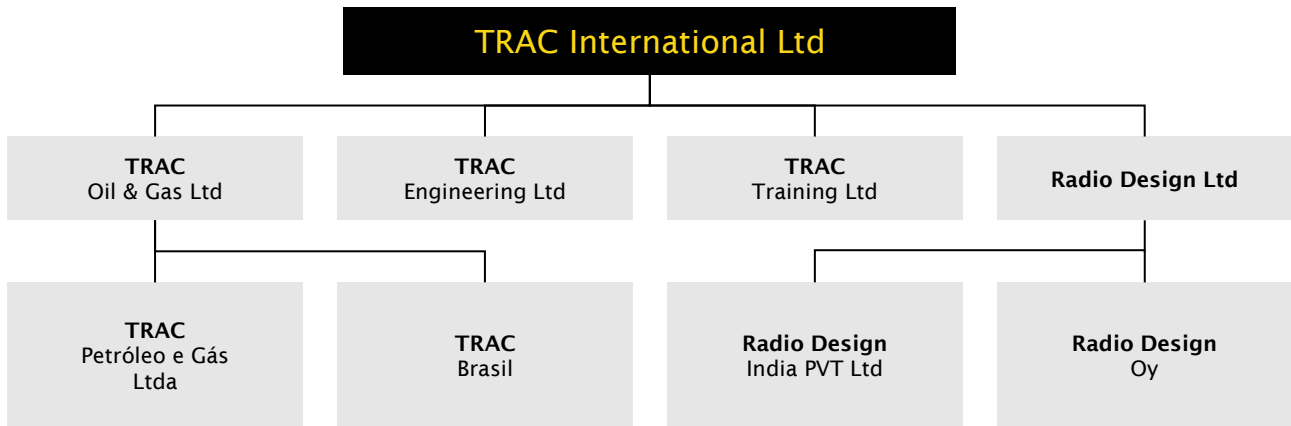


FAIR PROCESSING/ PRIVACY NOTICE



About Us

The TRAC International Group (TRAC) provides first class products and services and operates worldwide.



In this Notice:

'TRAC', 'we', 'us', 'our' etc. means TRAC International Ltd and all subsidiary companies shown above.

'You' means TRAC personnel (past, present and prospective), contractors, consultants, agency staff and people connected with you (such as the person you nominate to contact in an emergency).

We are what is known as the 'Controller' of personal information that we gather and use. 'Personal Information' means information about you and from which you could be identified.

TRAC are committed to collecting and using data fairly and in accordance with the requirements of the General Data Protection Regulations (GDPR). We will ensure that we have in place appropriate technical and organisational measures to prevent unauthorised or unlawful processing of personal data and against accidental loss or destruction of personal data.

Our Fair Processing and Privacy Notice outlines our purposes in using your information and outlines your rights. In particular we will:

- Process your information fairly and lawfully;
- Maintain adequate security and safeguards during processing;
- Ensure the safe and secure disposal when finished.

It also explains your privacy rights.

You can get in touch with our Data Protection Team via:

Email - GDPRteam@trac.com

Post - TRAC Group GDPR Team
c/o TRAC International
3 Thistle Road
Dyce, Aberdeen
AB21 0NN

Definitions

- **Breach** – loss of information (e.g. from targeted hacker or physically losing files).
- **Consent** - freely given, specific, informed and explicit consent by statement or action signifying agreement to the processing of their personal data.
- **Data Controller** - owner/user of gathered personal data - the entity that determines the purposes, conditions and means of the processing of personal data.
- **Data Erasure** - also known as the Right to be Forgotten, it entitles the data subject to have the data controller erase his/her personal data, cease further dissemination of the data, and potentially have third parties cease processing of the data.
- **Data Processor** - the entity that processes data on behalf of the Data Controller.
- **Data Subject** - an individual - a natural person whose personal data is processed by a controller or processor.
- **Personal Information** - information that directly and clearly identifies an individual or can be used in combination with other information to identify an individual.
- **Privacy Impact Assessment** - a tool used to identify and reduce the privacy risks of entities by analysing the personal data that are processed and the policies in place to protect the data.
- **Sensitive Personal Information** - a subset of personal information that may be more sensitive to the individual (e.g. relating to racial or ethnic origin, political opinions, religious beliefs, health, sex life, criminal convictions). Personal data concerning disability is sensitive data.
- **Subject Access Right** - also known as the Right to Access, it entitles the data subject to have access to and information about the personal data that a controller has concerning them.

<https://www.eugdpr.org/glossary-of-terms.html>



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Changes to our Fair Processing and Privacy Notice

Our notice will be updated from time to time. We will ensure that staff are notified of all changes.

What information do we collect about you?

We need to keep and process information about you for normal employment and business purposes. We hold and process both personal data and sensitive personal data about our personnel (past, present and prospective), contractors, consultants, agency staff and people connected with you.

This information is used to:

- Administer our employment or contractual relationship with you (e.g. payroll),
- Run our business/pursue legitimate business interests,
- Comply with our legal and other compliance obligations.

Information we collect and process includes, but is not limited to:

INFORMATION TYPES	EXAMPLES (N.B. - LIST NOT EXHAUSTIVE)
About You	Name, address, telephone number, date of birth, age, emergency contacts, details of any disabilities, restrictions and/or required accommodations.
Identification	Passport, driver licence, other photographic ID, electronic signatures.
Suitability to work	CV, references, evidence of right to work in UK, Visa details, driver licence check, competencies, certification, skills, experience, health information where applicable.
Payroll processing	Bank details, national insurance number, P45/P46, pension contributions, holiday requests, nominated beneficiaries, email, benefits, sickness/absences.
Ongoing employment	Contract of employment, performance review, appraisal, training records, promotion, disciplinary/grievance records, vehicle, health and safety records.
System access	Email, passwords, swipe card, key holder.
Captured on our security systems/IT systems	CCTV, key card entry systems, vehicle trackers, phone use.

Throughout employment with us, you will inevitably be referred to in many company documents and records whilst carrying out your duties and the business of the company.

Unless otherwise agreed with you, we will only collect basic personal data about you, which does not include any special categories of personal information about you (often known as 'sensitive personal data').



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How do we collect information about you?

Much of the information we hold about you will have been provided by you prior to employment, at induction and as required throughout employment.

However, some information will also come from internal sources (e.g. your Manager via appraisal) and in some cases will be provided by external sources (e.g. referee at employment, by appointed Occupational Health provider etc.).

We do not use automated decision-making or profiling to:

- Administer our employment or contractual relationship with you,
- Run our business/pursue legitimate business interests.

How will we use information about you?

TRAC process personal data as necessary to:

- Administer your employment with us - e.g. to pay your wage into your bank account;
- Ensure the legitimate interest(s) of us as a company;
- Comply with legal and other compliance obligations.

Throughout your employment with us, the following may occur:

- You are put forward as evidence of capability (e.g. your CV) for works;
- You are included as part of our social media/CSR/promotional material.

TRAC reserve the right to monitor the use of our premises, equipment, devices, computers, network, applications, software, and similar assets and resources. Monitoring activities include:

- The use of CCTV cameras in and around some of our premises;
- Auditing our activities to ensure compliance with regulatory and other compliance obligations;
- The use of IT services to ensure network and information security (including bandwidth use);
- Testing and maintaining our systems and to ensure robust performance;
- Location and driving speed of vehicles/plant;
- Access to premises.

Monitoring activities may result in the collection of personal information about you.

Access to your data will be held by the relevant HR or Operational team and restricted to only those that require access to process in accordance with a particular department's operational needs.

NB - If in the future we intend to process your personal data for a purpose other than that which it was collected for, we will provide you with information on that purpose and any other relevant information.

Sharing your information

We will only disclose information about you to third parties if we are legally obliged to do so or where we need to comply with our contractual duties to you (for instance we may need to pass on certain information to pension or health insurance schemes).



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External Disclosures

Sometimes we will pass information about you to third parties, where the law allows it. For example, we might confirm the dates and nature of your employment with us to a prospective employer.

In addition, we use third party suppliers and service providers for a number of activities required to administer our business functions (e.g. IT systems, occupational health providers etc).

It is in our legitimate interest to use third party suppliers to maintain cost effective/efficient operations and to provide specialist advice/services. Where we use third party and service providers, we only disclose to them any personal information that is necessary for them to provide their service. We ensure relevant contracts are in place which require them to keep your information secure.

International Transfers

Generally, information you provide to us is stored on our secure servers, or on our cloud-based system(s), which are located within the European Economic Area (EEA).

However, there are times when we do need to store information outside the EEA. If we transfer your information outside the EEA, we will take steps to ensure that appropriate security measures are taken to protect your privacy rights. This may include imposing contractual obligations on the recipient and/or ensuring that the recipients are subscribed to equivalent frameworks to ensure adequate protection.

We do not sell your information to other organisations.

How do we protect your information?

We take our duty to protect your personal information seriously and are committed to taking all reasonable measures to ensure the appropriate technical and organisational measures are in place to prevent:

- Unauthorised or unlawful processing of personal data;
- Accidental loss or destruction of personal data.

Technical and organisational measures include:

- Secure servers;
- Firewalls;
- Password protection;
- Assigned access only to relevant persons;
- Encryption based software;
- All personnel working on behalf of TRAC are required to sign a confidentiality agreement;
- Non-disclosure agreements in place where applicable (e.g. students doing research on our behalf).

All staff have a responsibility to:

- Ensure that they work within criteria set by TRAC (e.g. work out of secure drives and not on desktop, work in Citrix if required at that location etc);
- Not share your or anyone else's personal information unless there is a legitimate business reason for doing so;
- Keep your own personal information and that of your co-workers/third parties secure.

REMEMBER - infringement of data protection rules may result in disciplinary action.



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How long do we keep hold of your data?

We will process your personal information throughout your tenure with us.

If you decide to leave our employment, your personnel file will be kept for 6 years or as long as is legally required or permitted by an applicable law.

Data will be securely destroyed when no longer required (e.g. where you no longer work for the company, employment records and any other information will be stored securely in accordance with statutory and recommended retention periods and disposed of thereafter).

Prospective employees

When applying for an advertised position, you will be directed to submit your CV to a specific email address. CVs will be held for a period of 12 months before being disposed of securely.

Where we advertise for field based operational roles on an ad hoc/ongoing basis, prospective employees will be invited to submit their CVs via the relevant company website and upload information on to our Personnel Database. The Personnel Database is a self-managed tool where prospective employees opt in and have the ability to remove their profile fully at any time.

Speculative submission of CVs should be sent in via the stated email address on the relevant website. Should speculative CVs be sent direct to staff not named as the contact for a specific role, consent will be considered freely given to process.

Children

The GDPR provides for special protection for children's personal data. We will comply with the requirement to obtain parental or guardian consent for any data processing activity involving anyone under the age of 16.

Data loss

If a data breach occurs that is likely to result in a risk to the rights and freedoms of individuals, the people affected will be informed as soon as possible and the Information Commissioner's Office (ICO) will be notified within 72 hours.



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Your Rights

Under GDPR you have the following privacy rights:

Right to object - to our processing of your personal information.

Access to your personal information - you can request access to a copy of your personal information that we hold, along with information on what personal information we use, why we use it, who we share it with, how long we keep it for and how we dispose of it.

Right to withdraw consent - you can withdraw your consent at any time where you have given us your consent to use personal information.

Rectification - you can ask us to change/complete any inaccurate or incomplete personal information held about you.

Erasure - you can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.

Portability - you can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.

Restriction - you can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.

Make a complaint - about how we have used your personal information to us or to the [ICO](#).

We respect your right to object to any uses or disclosures of your personal information that are not:

- Required by law;
- Necessary for the fulfilment of a contractual obligation (e.g. employment contract);
- Required to meet a legitimate need of us as an employer.

If you do object, we will work with you to find a reasonable resolution.

If in the future we intend to process your personal data for a purpose other than that which it was collected for, we will provide you with information on that purpose and any other relevant information.

Right to be forgotten

We recognise the right to erasure, also known as the right to be forgotten, laid down in the GDPR.

Individuals should contact GDPRteam@trac.com with requests for the deletion or removal of personal data.

These will be acted on provided there is no compelling reason for continued processing and that the exemptions set out in the GDPR do not apply.

These exemptions include where the personal data is processed for the exercise or defence of legal claims and to comply with a legal obligation.



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Subject Access Request

You have a right to see all the information that we keep about you. This is called a subject access request.

We will comply with the one month timeframe for responses set down in the GDPR.

As a general rule, a copy of the requested information will be provided free of charge although we reserve the right to charge a 'reasonable fee' when a request is manifestly unfounded or excessive, particularly if it is repetitive.

If this proves necessary, the person concerned will be informed of their right to contest our decision with the supervisory authority (the [ICO](#)).

For and on behalf of TRAC International and subsidiary companies:

Managing Director: K Stephen

Signature:

A handwritten signature in blue ink, appearing to be "K Stephen".

Date: 23rd September 2020