

DATA PROTECTION AT THE ASSURED GROUP OF COMPANIES

Data Privacy Notice for Suppliers

Introduction

This policy forms part of our suite of Data Protection Policies, which, including our website terms of use and any other documents referred to, sets out the basis on which any personal data we collect from suppliers (including contractors and sub-contractors), or which is provided to us by them, will be processed by us. Please read the following carefully to understand our views and practices regarding supplier's personal data and how we will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulations (the "GDPR").

1. Definitions

Data controller - A controller determines the purposes and means of processing personal data.

Data processor - A processor is responsible for processing personal data on behalf of a controller.

Data subject - Natural person

Categories of data: Personal data and special categories of personal data

Personal data - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

Special categories personal data - The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

2. Who are we?

The Assured Group of Companies Data Controller is our Finance Director – Emanuel Addae. This is the person who ultimately decides *how* your personal data is processed and for what purposes.

The role of Data Processor is fulfilled by a team of designated company Data Champions, who represent the main areas of the business and are responsible for managing the processing of personal data within the business.

You can contact the Data Controller or Data Champions at info@assuredgroup.org

3. The purpose(s) of processing your personal data

We use your personal data for the following purposes:

To comply with legal requirements, including identification, right to work and criminal checking.

To make payments.

4. The categories of personal data concerned

With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

- Personal data, including address; date of birth; banking details; driving licence and identity document details.
- Business data, including invoices, remittances and the data required to populate them,
- i.e. a breakdown of the services provided to the Assured Group of Companies.

We obtain personal data directly from the data subject. Right to work documentation is verified by a third party checking service, which also complies with applicable legislative requirements.

5. What is our legal basis for processing your personal data?

Personal data (article 6 of GDPR)

Our lawful basis for processing your general personal data is as follows:

Consent of the data subject;	As per the relevant Subcontractor or Service Level Agreements
Processing necessary for the performance of a contract with the data subject or to take steps to enter into a contract or agreement	As per the relevant Subcontractor or Service Level Agreements
Processing necessary for compliance with a legal obligation	Right to work, Her Majesty’s Customs and Revenue, identity check and criminal record checks

6. Sharing your personal data

Your personal data will be treated as strictly confidential, and will be shared only with third parties who have a legitimate business use for any data supplied. Also the police, Her Majesties Custom and Revenue and any other relevant legal and / or government authority that has a proven legitimate legal basis for such a request.

7. How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary and we only retain data in line with our Retention Policy.

8. Providing us with your personal data

We require your personal data as it is both a statutory requirement, and a requirement necessary to enter into an agreement with the company.

If you fail to adhere the consequences we will not proceed with engaging your services as a supplier or will terminate this engagement if it has already commenced.

9. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

10. Transfer of Data Abroad

We do not transfer personal data outside the EEA.

11. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

12. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

13. How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact our Data Champions on info@assuredgroup.org

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email/) on 03031231113 or via email at <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.