

ECO WORLD LONDON SUPPLY CHAIN PRIVACY NOTICE

Eco World London Development Company Limited, registered in England and Wales with company number 05349278, and any of its associated companies ("Eco World London" "We" and "Us") are committed to protecting and respecting privacy.

WHAT IS A PRIVACY NOTICE?

This Supply Chain Privacy Notice is about how we use personal information relating to the representatives, employees and workers of our supply chain partners working on our behalf or on our sites, ("**you**" or "**your**"). We operate a separate Privacy Policy in relation to the way that we use information about our employees.

We are a "data controller". This means that we are responsible for deciding how we hold and use personal information about you and to make you aware of how and why the personal data of these individuals will be used and how long it will usually be retained for.

THE INFORMATION WE HOLD ABOUT SUPPLY CHAIN EMPLOYEES & WORKERS

Personal Data, or personal information, means any information about an individual from which that person can be identified. Where it is necessary we will collect, store, and use the following categories of personal information:

- Personal details: including name, title, address, telephone number, business email address, date of birth and gender;
- Employment details: including employment history, professional / occupational qualifications, details of site induction and training history;
- Professional/ Occupational Qualifications; where your employer provides it to us, next of kin details and emergency contact information.

We also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your health, including any medical condition, health and sickness record;
- Drug and alcohol results data, if appropriate;

HOW THE INFORMATION IS COLLECTED?

We collect and record personal information about you from a variety of sources, including:

- directly from you;
- indirectly from your employer;
- indirectly from the Disclosure and Barring Service, if appropriate; and
- indirectly from third party drug and alcohol testing services, if appropriate.

In some circumstances, data may be collected indirectly from building and location access control and monitoring systems and CCTV, if and to the extent permitted by applicable laws.

HOW WE WILL USE THE INFORMATION WE COLLECT

We will use the personal information we collect to:

- a. ensure that the individuals who work with us and/or on our sites, sales offices have the right skills, training and qualifications to comply with relevant regulatory requirements and standards for the works;
- b. health and safety and in the event of an emergency;
- c. monitoring of performance;
- d. to communicate and maintain our relationships with our various suppliers; and
- e. ensure the efficient operation of our sites;
- f. make business decisions about these relationships such as management and planning, including accounting and auditing, and pricing/remuneration.

LEGAL BASIS FOR PROCESSING INFORMATION ABOUT YOU

Our legal bases for processing personal data are:

- where we need to comply with a **legal obligation** i.e. to make sure we accurately report to HMRC for the purpose of VAT and to ensure that we can comply with health and safety requirements. This includes purpose (b) (*health and safety*) above, to ensure the trades are skilled and qualified to undertake tasks including using items of machinery, and to highlight an medical concerns that we need to be aware of in order to demonstrate statutory compliance and maintain a defence against future claims.
- where it is necessary for **our legitimate interests** (or those of a third party) for our processing activities related to:
 - For purpose (a) (*training*) and (c) (*monitoring performance*) - to ensure that our contracts are running effectively and meet business needs and to allow us to hold training sessions and ensure that we maintain a high calibre of staff.
 - For purpose of (b) H&S including ensure the trades are skilled and qualified to undertake tasks including using items of machinery, and to highlight an medical concerns that we need to be aware of. Additional contacts and next of kin during unexplained absence
 - For purpose (d) (*maintaining relationship*) above, to ensure we have the ability to contact a staff member out of hours for consent for emergency works as we have a 24-hour service cover and to ensure that we can promote our services.
 - For purpose (e) (*efficient site operation*) above, in order to manage our sites in operation or remotely and appropriately protect our property and interests and our staff;
 - For purpose (f) (*business decisions*) above, to enable us to make value vs cost decisions for all the teams, especially where the cost of the team is being recharged to clients and to operate as an efficient business on commercial terms.

Note: When we are processing based on legitimate interest, we will review this in order to ensure your fundamental rights do not override those interests.

For purpose (b) above, we may process special categories of personal data. This will be on the basis of the following additional basis:

- the processing is necessary for reasons of substantial public interests, to the extent permitted by applicable laws;
- the processing is necessary to protect your vital interests or of another person where you are physically or legally incapable of giving consent (for example in exceptional situations such as a medical emergency); or
- the processing is necessary for the establishment, exercise or defence of legal claims.

IF AN INDIVIDUAL FAILS TO PROVIDE INFORMATION

If you fail to provide mandatory information when requested marked with an *, such as in the process of completing pre-enrolment submission or if work on specialist sites, it may be necessary for us to exclude you from site and to inform your employer.

AUTOMATED DECISION-MAKING

You will not be subject to decisions based on automated decision-making.

DATA SHARING

Your personal data can be accessed by or may be disclosed internally to our associated companies (which refers to those companies belonging to the same family of companies as us and who benefit from a close relationship, shared systems and shared ownership) on a need-to-know basis.

We will also share data with:

- Regulators and legal advisers, where required because of a legal obligation (i.e. the Health & Safety Executive)
- with your employer; or
- if an approved company third party service providers who is supporting our normal business operations (e.g. software hosting providers).

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

DATA TRANSFERS

We will transfer your personal information outside the EEA where our third-party service providers and associated companies host data or process data outside the EEA. If we do, we will ensure a similar degree of security of data by ensuring at least one of the following safeguards is in place:

- We will only transfer your personal data to countries that the European Commission have determined provide an adequate level of protection for personal data; or
- we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; or
- If we use US-based providers that are part of EU-US Privacy Shield, we may transfer data to you, as they have equivalent safeguards in place.

In those cases you will have the right to ask us for more information about the safeguards we have put in place as mentioned above (e.g. to request a copy where the safeguard is documented, which may be redacted to ensure confidentiality).

DATA SECURITY

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

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

DATA RETENTION

We will retain 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. This will usually be the period of 4 years from the last date that you entered one of our sites or provided services to us. We may keep personal data longer in accordance with our Data and Document Retention Policy where required for legal or accounting purposes (including the defence of claims).

YOUR RIGHTS

Under certain circumstances, you have the right to:

- **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 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. They also have the right to ask us to delete or remove your personal information where they have exercised your right to object to processing (see below).
- **Object to processing** of personal information where we are relying on a legitimate interest (or those of a third party) and there is something about a particular situation which makes an individual want to object to processing on this ground. They also have the right to object where we are processing personal information for direct marketing purposes.
- **Request the restriction** of processing personal information. This enables an individual to ask us to suspend the processing of personal information about you, for example if they want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of personal information to another party.

If you want to exercise any of these rights, you should contact our Data Protection team in writing, whose details are provided below.

DATA PROTECTION TEAM

You 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. If you have any questions about this Privacy Notice or how we handle personal information, please contact the Data Protection Team whose details are as follows:

Data Protection Team
25 Victoria Street, London, SW1H 0EX

e-mail: ukdataprotection@ecoworldinternational.com

Any changes we make to this Privacy Notice in the future will be posted on our website and, where appropriate, notified to you by e-mail. Please check back frequently to see if there have been any updates or changes to our privacy policy.

This policy was last updated on 30 July 2018.