Vertas Group Data Protection Policy

1. Introduction

This Data Protection Policy covers all subsidiary companies of Suffolk Group Holdings trading as Vertas Group, including Vertas Group Limited, Concertus Design and Property Consultants Limited, Opus People Solutions Group Limited, Vertas Nottinghamshire Limited, Diamond View Cleaning Solutions Limited, Vertas Environmental Limited, Oakpark Security Systems Limited, Churchill Catering Limited, Vertas (Derbyshire) Limited, Verse Facilities Management Limited, Vertas (Ipswich) Limited, Schools' Choice, Concertus Derbyshire Limited , Concertus Ipswich Limited, Opus People Solutions Limited Opus People Solutions (East) Limited and Opus Teach Limited

This policy sets out the Groups commitment to protecting personal data and how we implement that commitment with regards to the collection and use of personal data.

Vertas Group needs to gather and use certain personal data about individuals. This can include customers, suppliers, business contacts, employees and other people Vertas Group has a relationship with or may need to contact. ***If you are an Employee of Vertas Group, please refer to our separate Employee Data Protection Policy accessible on the colleague hub Workvivo and provided in your New Starter Pack.***

Vertas Group has an appointed qualified Data Protection Officer. Their role is to inform and advise the company on its data protection obligations. They can be contacted at DPO@Vertas.co.uk and help answer questions about this policy or offer data protection advice and guidance.

2. Definitions

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer various kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes name, contact details, address, username or similar identifier, marital status, title, date of birth, National Insurance number and gender.
- **Financial Data** includes bank account details.
- **Transaction Data** includes details about payments made to you.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Special Categories of Personal Data** includes information about your health (To provide suitable adjustments) and criminal convictions and offences (For safeguarding purposes). We may collect details of your race or ethnicity, religious beliefs, sexual orientation or genetic and biometric data.

3. Data Protection Principles

1. Personal data shall be processed fairly and lawfully and in a transparent manner.
2. Personal data shall be collected for a specified, explicit and legitimate purpose.
3. The company processes personal data only where it is adequate, relevant and limited to what is necessary for processing.
4. The company keeps accurate personal data and takes all reasonable steps to ensure inaccurate personal data is rectified or deleted without delay.
5. The company retains personal data only for the period necessary for processing.
6. The company adopts appropriate measures to make sure personal data is secure, and protected against unauthorised or unlawful processing, and accidental loss, destruction or damage.
7. The company shall be responsible for and be able to demonstrate compliance with these principles.

To fulfil our obligations under various Framework Agreements, certain data may be processed by third-party service providers. The Group will inform individuals the reasons for processing their personal data, how it uses such data and the legal basis for processing in the Appendix at the end of this document.

Where the company processes special categories of personal data or criminal records data to perform obligations or to exercise rights in employment law, this is done in accordance with the UK General Data Protection Regulation (UK GDPR).

The Group will update personal data promptly if an individual advises their information has changed or is inaccurate and personal data is held in:

- The individuals personal file (hard copy or electronic format, or both)
- People and Payroll systems, Client Management Systems, Energy Management Systems, Finance Systems, Communications systems, Time Management systems, and other systems the Group businesses use in their service delivery activities.
- On any written contractual document, or other correspondence, as necessary.

The periods for which Vertas Group holds personal data are within the Vertas Group Data Retention Policy.

4. Lawful Basis for Processing

Processing personal data shall be lawful only if at least one of the following applies:

- The individual has given consent to the processing of their personal data for one or more specified purposes.
- Processing is necessary for the performance of a contract to which the individual is party or to take steps at the request of the individual prior to entering into a contract.
- Processing is necessary for compliance with a legal obligation to which the data controller is subject.
- Processing is necessary to protect the vital interests of the individual or another natural person.
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller.
- Processing is necessary for legitimate interests pursued by the data controller or by a third party.

5. Individual Rights

Under data protection law, you have rights including:

- Your right to be informed – You have the right to be informed about the collection and use of your personal data.
- Your right to rectification - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete.
- Your right to erasure - You have the right to ask us to delete your personal information.
- Your right to restriction of processing - You have the right to ask us to limit how we can use your personal information.
- Your right to object to processing - You have the right to object to the processing of your personal data.
- Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you.
- Your right to withdraw consent – When we use consent as our lawful basis, you can withdraw your consent at any time.
- You also have the right to not be subject to automated decision-making processes, but we do not use those processes.

To enquire about these options or to ask the company to take any of these steps, the individual should send the request to DPO@Vertas.co.uk

In some cases, we may need to ask for proof of identification before the request can be processed. The company will inform the individual if it needs to verify their identity and the documents it requires.

We will normally respond to a request within one month of the date it is received. In some cases, such as where the company processes substantial amounts of the individual's data, we may require extra time to consider and process the request. If this is the case, we will write to the individual within one month of receiving the original request to tell them if this is the case and confirm that the request may take up to an extra two months to respond.

If a subject access request is manifestly unfounded or excessive, the company is not obliged to comply with it. Alternatively, the company can agree to respond but may decide to charge a reasonable fee, which will be based on the administrative cost of responding to the request. A subject access request is likely to be manifestly unfounded or excessive where it repeats a request to which the company has already responded. If an individual submits a request which is unfounded or excessive, the company will notify them this is the case and whether it will respond to it.

6. Freedom of Information

The company, wholly owned by a public authority, is subject to The Freedom of Information Act 2000 (FOI), and all requests for information which is not personal information must be treated as a FOI or EIR. These requests must be fully responded to within 20 (company) working days by law. The information will be provided unless the company can provide an exemption or exception under the FOI act.

As we are owned wholly by a public authority, we are also subject to data sharing as a part of the National Fraud Initiative (NFI). This means your personal data may be shared with the NFI to detect possible fraud.

7. Data Security

The company takes the security of personal data seriously. The company has internal policies and controls in place to protect personal data against loss, accidental destruction, misuse or disclosure, and to ensure that data is not accessed, except by employees in the proper performance of their duties.

- We have appropriate passwords and encryptions on systems and PC's
- All our employees are appropriately trained on GDPR and their roles and responsibilities
- We have departmental processes for handling, archiving and deleting personal data

Where the company engages third parties to process personal data on its behalf, such parties do so based on written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

Vertas Group is based wholly in the UK and does not transfer data outside of the UK.

8. Data Privacy Impact Assessments (DPIA)

Some of the processing Vertas Group carries out may result in risks to privacy. Where a new system is being considered which will process personal data, we will carry out a data privacy impact assessment to determine the necessity and proportionality of processing. This will include considering the purposes for which the activity is carried out, the risks for individuals and the measures which can be put in place to mitigate those risks.

The company has a template DPIA document that will be used and the DPO will advise and guide on the completion and maintenance of the DPIA.

9. Data Breaches

A personal data breach can be broadly defined as a security incident which has affected the confidentiality, integrity, or availability of personal data. In short, there will be a personal data breach whenever personal data is lost, destroyed, corrupted or disclosed, or if someone has access without proper authorisation.

If there is an alleged data breach you must notify our DPO immediately at DPO@Vertas.co.uk.

Examples of a data breach are:

- Access by an unauthorised individual or third party
- Sending personal data to an incorrect recipient
- Computing devices containing personal data being lost or stolen
- Alteration of personal data without permission.

If the company discovers there has been a breach of personal data which poses a risk to the rights and freedoms of individuals, it will report it to the Information Commissioner within 72 hours of becoming aware of the breach. The company will record all data breaches regardless of their effect.

If the breach is likely to result in a high risk to the rights and freedoms of individuals, the company will inform affected individuals without undue delay there has been a breach and provide them with information about its likely consequences and the mitigation measures it has taken.

Reports of data breaches are centrally logged by the DPO and reported to the Board of Directors.

10. Individual Responsibilities

Individuals are responsible for helping Vertas Group keep their personal data up to date. Individuals should let the company know if the data provided to the company changes.

11. Complaints

If you believe the organisation has not complied with your data protection rights, you can complain to the Information Commissioner although we would appreciate a chance to address your concerns.

Report a concern:

- Online at https://ico.org.uk/concerns/
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

All complaints will be processed in accordance with the Company's Complaints Process and should be sent to: DPO@Vetas.co.uk

Or if you would like to write to us:

Suffolk Group Holdings trading as Vertas Group

2 Friars Bridge Road
Ipswich

Suffolk IP1 1RR

FAO: Data Protection Officer

12. Additional Resources

For Opus People Solutions Group Limited, this privacy policy should be read alongside, and in addition to, our Terms and Conditions, which can be found at: Terms and Conditions | Opus People Solutions

For Concertus Design and Property Consultants Limited, this privacy policy should be read alongside, and in addition to, our Terms and Conditions, which can be found at: Terms and Conditions | Concertus

For Verse Facilities Management Limited, this privacy policy should be read alongside, and in addition to, our Terms and Conditions, which can be found at: Terms and Conditions | Verse

For Churchill Catering Limited, this privacy policy should be read alongside, and in addition to, our Terms and Conditions, which can be found at: Terms and Conditions | Churchill Catering

For Diamond View Cleaning Solutions Limited, this privacy policy should be read alongside, and in addition to, our Terms and Conditions, which can be found at: Terms and Conditions | Diamond View - Specialist Cleaning Solutions

Please refer to the Appendix at the end of this policy for the types of Data we collect and on what legal basis we do so.

GDPR Appendix

Types of data collected and the Legal Basis we use to do so for Clients, Suppliers, Site Visitors or Website visitors.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new candidate	Identity- Contact, Profile, Personal data	For job seeking purposes/ Maintaining your record on our databases/Necessary to comply with a legal obligation
To process payments to you	Identity- Contact / Financial / Transaction	To ensure payments are made for work undertaken/Necessary to comply with a legal obligation
To manage our relationship with you which includes; Notifying you about changes to our terms or privacy policy Asking you to leave a review or take a survey	Identity- Contact, Profile / Marketing and Communications	Performance of a contract with you/Necessary to comply with a legal obligation/Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	Identity- Contact / Profile / Usage / Marketing and Communications	Performance of a contract with you/Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity- Contact / Technical	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)/ Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	Identity- Contact / Profile / Usage / Marketing and Communications / Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	Technical / Usage	Legitimate interests (to define types of customers, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services which may be of interest to you	Identity- Contact / Technical / Usage / Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)
To prevent fraud	Identity- Contact / Financial	Legal Obligation
To deter and to be able to report on crimes or potential crimes in and around our premises	Identity- CCTV, Photographs (This may be in some cases processed by third parties)	Vital Interests