

BELLTREE LIMITED

Plain Language Privacy Information for Data Subjects

May 2018

1. Introduction

This statement seeks to provide relevant information to you under Article 13 of the General Data Protection Regulation (Regulation (EU) 2016/679) ('GDPR'). For the meaning of specific terms used in this information please refer to <https://gdpr-info.eu> or contact us using the contact details in section 2. In this statement "data" refers only to "personal data" as defined in GDPR.

2. Who we are

This statement applies to the following Company (called the "Data Controller" and "Data Processor" under GDPR).

BELLTREE LIMITED, incorporated in Scotland (Registered Number SC160001), and having its Registered Office at 14-16 Jackson's Entry, The Tun, Holyrood Road, Edinburgh, Scotland, EH8 8PJ ("the Company"). Telephone/fax: +44-131-225-4428. Email info@belltreegroup.co.uk

3. Our contact details

For any relevant queries relating to privacy or GDPR please email info@belltreegroup.co.uk, telephone/fax: +44-131-225-4428 or write to us at 14-16 Jackson's Entry, The Tun, Holyrood Road, Edinburgh, Scotland, EH8 8PJ with attention to Peter Clark, Technical Director. Please remember to include contact details so that we can get back to you.

Please note that we have decided not to appoint a dedicated Data Protection Officer (DPO) as, under Article 37 of GDPR, appointment of a dedicated DPO is not required for a Company like us. This decision will be reviewed regularly to ensure we continue to comply with legislation and continue to protect the data we hold in the most appropriate way. The person at our Company with the delegated responsibility for ensuring that we adhere to our responsibilities to protect and process your data in the right manner is Peter Clark, Technical Director.

4. **The kind of data we process and our legitimate interests for doing so**

The Company is only interested in data that helps us deliver valued products and services to our clients, comply with our legal requirements and manage our staff and business effectively. This typically includes:

- Contact details such as name, email address, phone/fax numbers to keep us in touch with staff, associates, clients and suppliers and allow us to inform potential clients about our products and services;
- Personal & professional history details that enable us to assess the professional capabilities of current and prospective employees and associates;
- Personal details including marital status and dependants, gender, date of birth, next of kin contact details, annual leave, sickness absence dates, pension, maternity, paternity, adoption, shared parental leave and benefits information and limited medical information for our staff and associates in order to effectively manage our workforce, manage relevant HSE risks and adjudicate fitness to work and;
- Salary, payment, account, tax status information and other relevant information to manage payments to and from our staff, associates, clients and suppliers;

Additionally, when you visit our website at www.belltreegroup.co.uk, we use cookies to deliver a better web experience during your session and for the next time you return.

5. **Where we collect personal data**

Personal data we hold is provided to us either by the individual themselves, a third-party organization representing them (e.g. their company, professional body or agent such as a recruiter) or via a public domain source (such as a public social media account). We do not collect personal data indirectly from other sources, such as commercial marketing databases.

6. **What we do with data we collect**

Our primary goal is to process and safeguard the data that our staff, associates, clients and suppliers provide us in line with legislation and their rights and expectations. We use personal data to ensure we provide high quality products and services, to introduce our products and services to prospective clients, to provide important service and product information and updates and to comply with our contract and legal requirements.

To enable us to achieve the above aims we will process, store and back up data held by us for varying periods of time. Standard processing, storage and back up periods vary by data type and detailed guidelines have been advised to staff to ensure data is not held longer than is required. Data reviews considering the requirement to store all types of data held are held regularly every six months.

We directly market our products and services to businesses and to individuals. When contacting people we abide by relevant legislation requirements. We providing people with the option to opt-out of further contact from us, inform them of their right to ask us that we stop processing their data and (where required) seek direct consent from them to process their data and make further contacts.

Our Company data back-up procedures require that we transfer data to a third-party

cloud-storage provider who in turn transfers that data to secure data centres in the United States of America. This constitutes a 'transfer of data to a third country' as considered in GDPR Chapter 5. We manage risks involved in transferring data to our third-party cloud storage provider by ensuring (to the extent that we are able) that our provider is reputable, appropriately licenced and compliant with relevant legislation. Our chosen provider is a member of the *Privacy Shield* program which permits them to transfer and process personal data for EU citizens outside of the European Economic Area.

Privacy Shield Program Overview

The EU-U.S. and Swiss-U.S. Privacy Shield Frameworks were designed by the U.S. Department of Commerce, and the European Commission and Swiss Administration, respectively, to provide companies on both sides of the Atlantic with a mechanism to comply with data protection requirements when transferring personal data from the European Union and Switzerland to the United States in support of transatlantic commerce. On July 12, 2016, the European Commission deemed the EU-U.S. Privacy Shield Framework adequate to enable data transfers under EU law (see the adequacy determination). Source: <https://www.privacyshield.gov/Program-Overview>

7. What we don't do with data we collect

We do not sell or transfer personal data to marketers or other vendors and we do not use personal data for automated decision making, particularly profiling.

8. How we protect the data we collect

We have strong procedures in place to ensure that we protect the data provided to us, including but not limited to:

- Physical security procedures for hard copy documents and company devices;
- Storage of data in encrypted digital states;
- Requirements for strong passwords on all devices
- Use of reputable a third party data back-up service provider

Further details on our security measures can be provided by contacting us using the details in section 3.

9. What lawful reason do we have for processing data?

Article 6(1) of GDPR sets out the lawful reasons that a Company may rely on to process your personal data. These are as follows:

- a) *the data subject has given consent to the processing of his or her personal data for one or more specific purposes;*
- b) *processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;*
- c) *processing is necessary for compliance with a legal obligation to which the controller is subject;*
- d) *processing is necessary in order to protect the vital interests of the data subject or of another natural person;*

- e) *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 controller;*
- f) *processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child*

Generally the processing of personal data at the Company is justified under items b) and f), above. The lawful reason for processing has been considered by us in detail for each type of data we hold and is reconsidered as part of regular Data Reviews, held at least every six months. Details of the lawful reason we are relying on for processing your data are available on request by contacting us either verbally or in writing (see contact details in section 3).

On occasion we may seek specific consent from you to store and process your data, particularly if this processing would be for a manner or a length of time which you would not reasonably expect. An example of this is we would typically ask for consent to store your CV details for long-term future reference if you provide them to us and you are not successful in securing the position for which you applied.

10. **What rights do you have in relation to your personal data?**

You have the right to be informed about how we collect and use your personal data, as well as be informed about your rights in relation to your personal data. We aim to inform you of these points via this statement and other policies posted at www.belltreegroup.co.uk, however you can always contact us (using the contact details in section 3) for more information;

You have the right to:

- a) refuse to give consent for us to collect and process your data (although we may still have a lawful basis for doing so) and withdraw any previous consent given at any time;
- b) object to the processing of your personal data;
- c) stop us using your data for direct marketing;
- d) have access to your personal data;
- e) receive a copy of your personal data and/or have us transfer that data to another data controller;
- f) have inaccurate personal data updated, rectified, or completed by us;
- g) request the restriction or suppression of your personal data;
- h) request the erasure of your personal data and;
- i) be informed if your personal data is used for automated decision making, including profiling, and have access to special tools to manage this (note that we do not do this).

To exercise any of the rights listed above you can submit a request to us verbally or in writing by using the details in section 3. We have up to one month to respond to your request. We will usually not charge a fee to deal with a request. We reserve the right to charge a £50 administration charge per request if a single data subject levies more than one request per month without clear reason.

Note that in circumstances in which we require your consent to process your data,

refusal or withdrawal of consent may limit the way in which we can interact with you and the products and services we can offer.

Full details of your rights under GDPR are available at <https://gdpr-info.eu/chapter-3/>

11. **Implementation of Statement**

This Statement shall be deemed effective as of 24 May 2018. No part of this Statement shall have retroactive effect and shall thus apply only to matters occurring on or after this date. We will review this statement from time to time and reserve the right to make changes to this notice from time to time. We advise that data subjects check the document at www.belltreegroup.co.uk regularly for any updates.

This Statement has been approved and authorised by:

Name: Rodrick Alexander Clark

Position: Director

Date: 24 May 2018