



Information Notice for Contact Persons

This information notice is intended for contact persons, whose personal data we do process. By contact persons we mean also representatives authorised to act on behalf of our clients, subcontractors, suppliers, including for example directors, board members, members of partnerships, commercial proxies. We provide the below information because to act in accordance with the UK General Data Protection Regulation ("UK GDPR") and Data Protection Act 2018. The Company from the **Walstead Group with which your company has or is interested in having a contractual relationship is the "Data Controller"**. The information notice makes you aware how your personal data will be processed and retained.

1. What types of your personal data do we process?

We process your personal data, such as first name, surname, e-mail address, telephone number, work address, your position/title.

2. How do we collect your personal data?

We may collect your personal data in a variety of ways. We may receive it from your employer or the employee employed by your organisation. We may find it on Internet, including social media or we can receive it directly from you.

3. Why do we need your personal data and what are the legal grounds for processing?

We process your personal data for the following purposes:

- In order to establish cooperation with our clients, subcontractors, suppliers. We arrange the technical details of the products or services with you (e.g., technical parameters of our products, technical specifications of the equipment we purchase, schedules, price lists).
- In order to perform contracts, we concluded with our clients, subcontractors, suppliers, including, for instance, to assess whether the contract has been performed properly, agree on modifications to the schedule. Without being able to contact you we would not be able to perform our contracts. It is our legitimate interest which we pursue.
- In order to offer our products and services to our clients (direct marketing). We send you information about our new products and services or the products and services which, in our opinion, could interest your employer/contractor - our client - and to re-establish our cooperation. The desire to establish, extend or renew cooperation constitutes our legitimate interest which we pursue.



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Your personal data is entered into our IT systems and stored there for easy access whenever we need it. To whom do we disclose your personal data

4. To whom do we disclose your personal data?

Not only do we process your personal data, but we also disclose it to various groups of recipients, but only when it is related to the purposes for which we process your personal data or to our use of the IT systems. We disclose your personal data e.g., to our contractors, including other companies from our Group of companies, third parties which provide us with services in the context of maintenance, repair, updating of IT systems or e.g., the couriers.

5. Will the data be transferred to a third country?

Due to the use of Microsoft Azure and Google cloud services, personal data may potentially be transferred to third countries (outside of the UK/ European Economic Area). In such event the transfer is secured by Standard Contractual clauses.

6. How long do we retain your personal data?

We process your personal data as long as we can cooperate with your employer/contractor - our client, subcontractor or supplier, including as long as we can offer them our products and services.

7. When may you object to our processing of your personal data?

In case of processing of your personal data as a result of our legitimate interest you have the right to object to it at any time, but not in any situation. You may do so only when a special situation concerning you arises. We may also indicate important, legitimate grounds to be able to further process your personal data or to do it to assert our right or in defence.

In addition, you have the right to object to the processing of your personal data by us at any time and regardless of additional circumstances, but only if we process it for the purposes of direct marketing or profiling.

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8. What are your rights in connection with processing?

First of all, you may request us to immediately erase your personal data (the right to be forgotten). You may exercise this right in cases specified in the law, e.g., when we do not need your personal data any more for the purposes it has been collected.

You also have the right to:

- Access your personal data, including to receive a confirmation that we process your personal data, to access it, and to receive from us particular information related to the processing of it;
- Request from us a rectification of your personal data, if it is inaccurate or if your personal data is incomplete;
- Request us to restrict the processing of your personal data in cases specified in the law (e.g., when you question the correctness of your personal data processed by us);
- Request us to save your personal data in a file in a commonly available format in a structured manner and transmit it to a controller of your choosing (right to data portability);
- Submit a complaint to the Data Protection Authority (ICO) if you think that we process your personal data against the law.

If consent is the basis for the processing, you can withdraw your consent at any time.

Exercise of the rights can be subject to some exceptions e.g., legal claims or public interest (crime detection or prevention).

The requests pertaining to the above rights will be reviewed by us and we will respond within one month.

If you wish to exercise any of these rights, please request it in writing by sending us an e-mail to dpo@walstead-uk.com.

9. How do we protect data?

We take the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed and is not accessed except by our personnel in the proper performance of their duties. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable data protection authority of a suspected breach where we are legally



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required to do so. All of your data will therefore be held securely and processed only by those who use your data for the purposes of the recruitment process as referenced above.

Where we engage third parties, to process your personal data on our behalf, they do so as the data processor on the basis of the proper data processing agreements and they are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of your data.

10. Is my data subject to automated decision making or profiling?

No, your data will not be subject to profiling or other decisions that will have significant impact on you based solely on automated decision making.

11. Are you obliged to disclose your personal data to us?

When you provide us with your personal data yourself, you do it voluntarily. Remember however that you may be obliged to provide us with your personal data e.g., because you are an employee of our client and contacting us is one of your work duties. By not providing us with your personal data you may be in breach of such duties.