

Privacy Notice



ISO 9001:2015 QUALITY MANAGEMENT SYSTEM MANUAL

This Privacy Notice tells you what to expect in relation to personal information about you which is collected, handled and processed by Opals Group Ltd

We acknowledge and agree that any personal data of yours that we handle will be processed in accordance with all applicable data protection laws in force from time to time. Currently, the Data Protection Act 1998 applies. With effect from 25 May 2018, the General Data Protection Regulations ("GDPR") will come into force, which will change the law.

Scope

This global notice explains how Opals Group handles the personal information of employees, applicants, former employees, contractors, consultants and temporary agency workers in the course of its activities.

Personal Information means any information relating to an identified or identifiable natural person; one who can be identified, directly or indirectly, by reference to an identifier such as name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Special Categories of Personal Information (also known as Sensitive Personal Information) means Personal Information in the following categories: racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, data concerning health or sex life or sexual orientation, genetic data, and biometric data where processed to uniquely identify a person.

Identity of Data Controller

At the time of publishing this Privacy Notice, Opals Group have allocated Data Controller responsibility to the Office Manager.

Categories of Personal Information

In the normal course of business activities, we process the following categories of personal information:

- Personal identification information, such as your name, home address, date of birth, gender, work related photographs, and home phone number;
- Government-issued identification numbers, such as National Insurance for payroll purposes;
- Immigration, right-to-work and residence status;
- Family and emergency contact details;
- Job-related information, such as years of service, work location, employment ID, work record, vacation absences, and contract data;
- Educational and training information, such as your educational awards, certificates and licenses, vocational records and in-house training attendance;
- Recruitment and performance-related data, such as objectives, ratings, comments, feedback results, career history, work equipment, career and succession planning, skills and competencies and other work-related qualifications;
- Information related to your usage of Opals Group assets, in particular its computers and telecommunication systems, and traffic generated on the Internet;
- Information needed for compliance and risk management, such as disciplinary records, background check reports and security data; and

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- Payroll and payment or benefits related information, such as salary and insurance information, government identifier or tax numbers, bank account details, pension information, and employment related benefits information.
- Travel and passport information
- Photographs & Video footage

In addition, we may process Special Categories of your Personal Information, such as Health and sickness information, such as medical certificates; Criminal convictions and prosecutions

Legal bases for Processing

We will process your Personal Information on the following legal bases:

- The performance of a **contract** with you;
- The **legitimate interests** of Opals Group, to run our businesses efficiently and effectively;
- As required by **law**;
- Your **consent**, where required and to the extent of applicable law; and
- Your **vital interests**.

We will process **Special Categories** of your Personal Information on the following legal bases:

- Your explicit **consent**;
- Employment **law**;
- Your **vital interests**;
- Publicly available data; and
- Legal claims.

Purposes of Processing

We process Personal Information for the following purposes:

- workforce planning, recruitment and staffing;
- workforce administration, payroll, compensation and benefit programs;
- performance management, learning and development;
- advancement and succession planning;
- legal compliance, including compliance with government authority requests for information, liens, garnishments and tax compliance;
- workplace management, such as travel and expense programs and internal health and safety programs;
- internal reporting;
- audit;
- to protect Opals Group, its workforce, and the public against injury, theft, legal liability, fraud or abuse or other injury; and
- other legal and customary business-related purposes.

Data Security

Opals Group monitors and filters the use of company devices, our network, and internet traffic for lawful business purposes, and in particular for:

- Ensuring adequate Information Systems integrity and detecting and preventing criminal activity, including cyber-crime;

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- Protecting information, including, but not limited to, personal information, confidential information, and high-value business information against destruction, loss, alteration, unauthorized access, disclosure or hacking;
- Securing the effective operation of its Information Systems;
- Ensuring compliance with applicable regulatory and self-regulatory obligations; and
- Detecting instances of non-compliance with Opals Group' policies on internet use and the Code of Ethics.

Recipients of Personal Information

We may disclose your Personal Information in the following circumstances to:

- Other Opals Group entities, joint ventures, subcontractors, vendors or suppliers who perform services on our behalf for the aforementioned purposes;
- A newly formed or acquiring organization if Opals Group is involved in a merger, sale or a transfer of some or all of its business;
- Clients who require provide evidence of technical or health and safety related competence to carry out works on their contract;
- Any recipient, if we are required to do so, such as by applicable court order or law;
- Any recipient, with your consent, such as for employment verification or bank loans; or
- Any recipient when reasonably necessary such as in the event of a life-threatening emergency.

Retention

Your Personal Information will be retained as long as necessary to achieve the purpose for which it was collected, usually for the duration of any contractual relationship and for any period thereafter as legally required or permitted by applicable law.

Protection and Security

Opals Group takes precautions to protect Personal Information from loss, misuse, and unauthorized access, disclosure, alteration, and destruction.

We have taken appropriate technical and organizational measures to protect the information systems on which your Personal Information is stored and we require our clients, suppliers and service providers to protect your Personal Information by contractual means.

Your Rights

Opals Group is guided by law in responding to privacy rights requests such as those listed below.

- **Information and Access:** You may request access to your Personal Information, be provided with supplemental information, and be provided with a copy of your Personal Information. The right to Information and Access has some restrictions. For example, access may be denied
 - In the case of recurrent access requests within a short time interval, or
 - where providing such access or correction could compromise the privacy of another person or unreasonably expose sensitive company information.
- **Rectification:** You may request to rectify and/or update your inaccurate or out-of-date Personal Information.
- **Erasure:** You may have the right to have your Personal Information erased. This right is subject to restrictions.
- **Restriction:** You may have the right to have your Personal Information restricted. Restriction means that your Personal Information is only stored by Opals Group, and not further processed, while your complaint is dealt with.

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- **Object to Processing:** You may have the right to object to specific types of processing. These types are direct marketing, processing for research or statistical purposes and processing based on legitimate interests. The right to object to processing based on legitimate interests may be subject to demonstration by Opals Group of grounds which override your right to object.
- **Data Portability:** You may have the right to request Data Portability. Data Portability is the provision of your Personal Information in a structured, commonly used and machine-readable form so that it may be transferred by you or by Opals Group to another company easily. The right to Data Portability is subject to restrictions. For example, Data Portability does not apply to paper records, and must not prejudice the rights of others, or sensitive company information.
- **Right not to be subject to decisions based solely Automated Decision Making:** You may have the right not to be subject to decisions based solely on automated processing (i.e. without human intervention), if those decisions produce legal effects or significantly affect you. Automated Processing is Processing of your Personal Information by automated means. You may also have the right to lodge a complaint with a supervisory authority.

You may request to exercise any of these rights by making a direct request, in writing to The Data Controller.

Consent and Withdrawal of Consent

If consent is the legal basis of the processing of your Personal Information or Special Categories of Personal Information, you may withdraw any consent previously granted for a specific purpose, free of charge, by contacting the Data Controller.

Privacy Concerns and How to contact us

If you have any questions about this notice or if you believe that your Personal Information is not handled in accordance with the applicable law or this notice, you should:

- Discuss the issue with your supervisor or another supervisor or manager,
- Contact the Data Controller.

Modifications to our Privacy Notice

We may amend this notice from time to time, should it become out of date.

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