

Privacy Policy

Customers and Business Contacts

WHO THIS POLICY CONCERNS

- Frazer-Nash Consultancy Ltd (company number 02562870, with registered office at Hill Park Court, Springfield Drive, Leatherhead, Surrey, England, KT22 7NL) (“Frazer-Nash”, “we”, “us”, “our”)
- Our customers and business contacts (including current, previous and prospective customers and partners), and specifically the data subjects for whom our customers and business contacts are acting as the data controller (“you”, “your”).

THE PURPOSE OF THIS POLICY

The nature of our relationship and interactions with you may require that we receive, collate, store, and process your personal data.

When we do so, we are subject to the UK Data Protection Act 2018, and the UK General Data Protection Regulation, any national implementing laws, regulations and secondary legislation, and any related or successor legislation on data protection (“Data Protection Law”).

This Policy describes how we collect and use your personal data.

Please read this Policy carefully, together with any other policy or notice relating to the personal data which we may publish on specific occasions when we are collecting or processing personal data.

TERMINOLOGY

Terminology in this policy is intended to be consistent with Data Protection Law.

“**Personal data**” means information that relates to an identified or identifiable individual.

“**Special category data**” means types of personal data which are sensitive and require a higher level of protection, for example, health, disability, racial or ethnic origin, political opinions or religious beliefs (as defined in Data Protection Law).

A “**data subject**” is any person whose personal data is being collected, held or processed.

A data “**controller**” determines the purposes and means of processing personal data.

A data “**processor**” is responsible for processing personal data on behalf of a controller.

PERSONAL DATA WE COLLECT THAT IS SUPPLIED BY YOU

We may collect, store, and use the following categories of **personal data**:

- Business contact details such as name, title, addresses, telephone numbers and business email addresses
- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses
- Role details within an organisation (e.g. title, position, department, name of organisation)
- Copy of driving licence
- Copy of identification information (for example passport, birth certificate, utility bill)
- Date of birth
- Gender
- Details of professional memberships, accreditations and insurances
- Copies of right to work documentation, references and other information
- Fees, charges and other payment information
- Information about your use of our information and communications systems
- Information contained in a curriculum vitae or company summary (any special category data contained therein will need to be redacted before it is supplied to us)
- National Insurance number
- Next of kin and emergency contact information
- Performance information
- Photographs

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- Electronic identification data, where required for the purpose of delivering products or services to our company (e.g. login, passwords, badge number and picture, IP address, online identifiers/cookies, logs, access and connection times, CCTV footage)
- Special category data (if applicable) including but not limited to:
 - information about any disability/illness where required to make reasonable adjustments.
 - Information about religion/religious beliefs where we need to accommodate this for dietary requirements.

HOW PERSONAL DATA IS COLLECTED

Where required we collect personal data in written documents, electronic communication including emails, email attachments, information entered into websites, web portals, web applications or other internet communication channels, information supplied on portable digital media, or information provided by verbal briefing.

HOW WE USE INFORMATION ABOUT YOU

Under Data Protection Law, we can only use your personal data if we have a proper reason for doing so. Most commonly, we will use your personal data in the following circumstances:

- (i) where we have a legitimate interest in carrying out our business activities, to plan, perform and manage our business relationship and any tenders and contracts we may enter into for which you are a stakeholder, or
- (ii) where we need to process such personal data to comply with a legal obligation.

Written instructions where we are the data processor

If an organisation is a data controller supplying personal data to us as part of a tender or contract with us, that organisation will need to provide us with written instructions defining how we should process the personal data.

If you choose to withhold your personal data

If you choose to withhold personal data when requested to provide it, in some cases and depending on the importance of the activity for which it was requested, we may not be able to capture and record their input with respect to the system, equipment or process under consideration and in some cases this may impede the progress of tenders or contracts.

Change of purpose

We will only use personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use personal data for an unrelated purpose, we will notify you beforehand and explain the legal basis which allows us to do so.

WHO WE SHARE YOUR PERSONAL DATA WITH

We will only disclose your personal data to third parties when the law allows us to do so.

By “third parties”, we mean other entities within our corporate group, or regulatory bodies, or the customer that commissioned the work, or a third party where in our reasonable opinion there is a legitimate reason for doing that (e.g. in the case that you ask us to pass it to an independent auditor).

We will only disclose personal data to such third parties in the following circumstances:

- (i) where we are required by law to do so;
- (ii) where it is necessary to administer the working relationship with you; or
- (iii) we have legitimate interest in disclosing the information to such third parties.

KEEPING YOUR PERSONAL DATA SECURE

We have appropriate technical and organisational measures in place to protect your personal data, and to prevent your personal data from being accidentally lost, or used or accessed unlawfully. We limit access to personal data to those who have a genuine

business need to know it. Those processing personal data will only do so in an authorised manner and are subject to a duty of confidentiality.

If we become aware of an actual or suspected data security breach, we will promptly take all necessary steps to address such breach.

HOW LONG YOUR PERSONAL DATA WILL BE KEPT

We will only retain your personal data 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. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of the personal data, the purposes for which we process personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal data so that it can no longer be associated with you or to the data subjects, in which case we may use such information without further notice to you. We will retain and securely destroy that personal data in accordance with our data retention policy.

TRANSFERRING DATA OUTSIDE OF THE UK OR EUROPEAN ECONOMIC AREA (“EEA”)

As well as our network of offices in the UK, we also have several offices in Australia. As a result, from time to time, we may transfer your personal data to Australia. This would likely occur in the event we are progressing a project that is managed by one of our Australian offices.

It may also be necessary from time to time, for us to transfer your personal data to other countries outside the UK or EEA. For example, where you instruct us to contribute to a project outside of the UK or EEA.

With regard to transfers of personal data to Australia, we will ensure your personal data is protected by requiring our Australian offices to comply with the EU’s model clauses (or UK equivalent clauses) on transfers of personal data outside the UK or EEA.

For transfers to non-UK and non-EEA countries other than Australia, we will safeguard your personal data by

- (i) ensuring that the transferee country is one which has been granted an EU “adequacy decision” or UK equivalent; or
- (ii) putting in place sufficient safeguards, in accordance with the applicable Data Protection Law, to protect your personal data.

YOUR RIGHTS AND RESPONSIBILITIES

Your rights in connection with personal data

Under certain circumstances, by law you have the right to:

- **Request access** to personal data (commonly known as a “data subject access request”). This enables you or your data subject to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you.
- **Request erasure** of personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove personal data where you have exercised your right to object to processing (see below).
- **Object to processing** of personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground.
- **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of personal data to another party.

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For more information about your rights, you may wish to look at the Information Commissioner's Office website www.ico.org.uk. If you wish to exercise any of these rights, please see the "contact us" section below.

No fee usually required

You will not normally have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is an appropriate security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

RIGHT TO WITHDRAW CONSENT

In the circumstances where you have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact us. Once we have received notification that you have withdrawn your consent, we will no longer process your personal data for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

HOW TO CONTACT US

If you have any questions about this Policy or how we handle your personal data, or if you want to review, verify, correct or request erasure of personal data, object to the processing of personal data, or request that we transfer a copy of personal data to another party, please contact our Head of Human Resources using the email address datamanagement@fnc.co.uk.

In the event you have a complaint relating to our handling of your personal data, you also have the right to lodge a complaint with the Information Commissioner in the UK.

CHANGES TO THIS POLICY

We reserve the right to update this Policy at any time, and we will republish it when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.