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This policy is in place to ensure that the company meets the requirements of The General Data Protection Regulation 2016/679, implemented in May 2018.

WHEN DO WE COLLECT YOUR DATA:

We collect your personal information in a number of ways:

- When you provide it to us directly on commencement of employment.
- When you contact us by any means e.g. telephone, email
- When you visit our premises which have CCTV systems. These systems may record your image for the security of you and our staff.

WHAT TYPES OF DATA DO WE COLLECT:

Collecting very specific, relevant information is a necessary part of us being able to provide you with the services and products that help you to grow your business success.

We collect the following information:

- Your name
- Your contact information including email address and phone numbers
- Copies of any documentation you provide to us
- We will keep details and recordings of your communications with us through email, telephone, in writing, in person and via social media.
- Your recorded image on CCTV when you visit our premises

WHY WE NEED YOUR DATA

We require this information to understand your needs and supply you with the best possible service. We use your information in development of our legitimate interests in operating our services and business. We can break the data we collect into the following categories:

Subcontractor / Self-employed Personnel - we need to collect and use information about you, your colleagues and company to provide you with our services such as:

- Ensuring compliance with tax and employment laws
- Responding to your queries and requests for information
- Sending you information by email, telephone, web and post about Hudson Contract which is likely to be relevant and helpful to you – you can opt out of this at any time
- To protect our business and your business to defend a legal claim and/or as part of the legal requirement

We will only ask you for the details that we need to enable us to carry out our contractual arrangements to ensure our service to you runs smoothly.

Supplier Data: We collect data from you to enable us to carry out our contractual arrangements so our relationships run smoothly.

HOW WE LOOK AFTER YOUR DATA:

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We are committed to ensuring that your information is secure. In order to stop unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard the information we collect online.

We continually monitor our systems for potential areas of vulnerabilities and attacks, and we regularly carry our penetration testing to identify additional ways to protect your data and our business.

HOW LONG DO WE KEEP YOUR DATA:

We will only keep your data for as long as it is necessary for the purpose for which it was collected. At the end of the required retention period we will destroy, delete or anonymise your data.

WHO DO WE SHARE YOUR DATA WITH:

We sometimes share your personal data with trusted third parties in order to fulfil our contractual and legal requirements.

To ensure your data is kept safe, we apply the following policies to all organisations:

- We provide only the information they need to perform their specific services.
- They may only use your data for the exact purposes we specify in our contract with them.
- We work closely with them to ensure that your privacy is respected and protected at all times.
- If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.

Examples of the kind of third parties we work with are:

- Payroll companies, for example, Hudson Contracts
- IT companies who support our website and other business systems.
- Banks for reference purposes

On occasion we may need to share you data with a third party for their own purposes, we will only do this in very specific circumstances and confidentiality clauses will be standard within contracts e.g.

- For fraud management, we may share information about fraudulent or potentially fraudulent activity. This may include sharing data about individuals with law enforcement bodies.
- We may also be required to disclose your personal data to the police or other enforcement, regulatory or Government body, in your country of origin or elsewhere, upon a valid request to do so. These requests are assessed on a case-by-case basis and take the privacy of our customers into consideration.

Staff training on GDPR will be carried out at inductions and then periodically. Training will also be available upon request.

This policy will be reviewed at Management Review and amended if and when required.



Signed.....Managing Director

Date: January 2024