
**Signature Fencing and Flooring Systems Europe
Limited**

Customer, Supplier and Employee Privacy Policy

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1. **Introduction**

- 1.1. Signature Fencing and Flooring Systems Europe Limited (registered in England and Wales with company number 07349179) of Kensington House, 3 Kensington, Bishop Auckland, County Durham DL14 6HX ("we", "us" or "our"), will process certain personal data about our customers, suppliers, potential employees, current employees and former employees.

This Privacy Policy provides information about how we use your personal data which is not obtained via our website (<https://signaturecorp.com>) or the Signature Systems Group mobile application. For our privacy policy relating to our processing of personal data obtained from those sources, please visit <https://signaturecorp.com/privacy-policy/>.

- (A) **SUPPLIERS** – we will collect and process personal data about individuals from our suppliers as detailed in Part 1 of Schedule 1 of this policy.
- (B) **CUSTOMERS** – we will collect and process personal data about individual customers as detailed in Part 2 of Schedule 1 of this policy.
- (C) **POTENTIAL EMPLOYEES, CURRENT EMPLOYEES AND FORMER EMPLOYEES** – we will collect and process personal data about these individuals as detailed in Part 3 of Schedule 1 of this policy.

- 1.2. Whether you are a customer, supplier, prospective employee, former employee or a current employee, we will process personal data (which may be held on paper, electronically, or otherwise) about you. We recognise the need to treat your personal data in an appropriate and lawful manner, in accordance with data protection legislation, including the General Data Protection Regulation ("**GDPR**") and the Data Protection Act 2018 (the "**DPA**"). The purpose of this Privacy Policy is to make you aware of how we will handle your personal data.

- 1.3. Please read this Privacy Policy carefully to understand our practices regarding your personal data and how we will treat it.

- 1.4. We reserve the right to amend this policy at any time. Any amended versions of this Privacy Policy will be published on our website at www.signaturecorp.com. We advise that you check this webpage periodically for any updated versions of this Privacy Policy].

2. **Data protection principles**

- 2.1. We will comply with the data protection principles in the GDPR, which say that personal data must be:

- 2.1.1. Processed fairly, lawfully and in a transparent manner.
- 2.1.2. Obtained for specified, explicit and lawful purposes and processed compatibly with those purposes.
- 2.1.3. Adequate, relevant and not excessive for the purpose(s) for which it is processed.
- 2.1.4. Accurate and up-to-date.

- 2.1.5. Kept in a form which enables identification of individuals no longer than necessary for the purposes for which it is processed.
- 2.1.6. Processed subject to appropriate security measures.
- 2.2. "Personal data" means recorded information we hold about you from which you can be identified. It may include contact details, other personal information, photographs, expressions of opinion about you or indications as to our intentions about you. "Processing" means doing anything with the data, such as accessing, disclosing, destroying, profiling or using the data in any way.

"Special category data" includes information about a person's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data (such as data relating to the inherited or acquired genetic characteristics of an individual), biometric data (for the purpose of uniquely identifying an individual), data concerning an individual's health (including both physical and mental health), sex life or sexual orientation. Criminal data is not included within the definition of special categories of data but if we process criminal data we will process it using the same safeguards we operate in respect of special categories of data.

- 2.3. "Profiling" means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movement.

3. **How we make sure processing of your personal data is fair and lawful**

- 3.1. We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- 3.1.1. Where we need to perform the contract we have entered into with you.
- 3.1.2. Where we need to comply with a legal obligation.
- 3.1.3. Where it is necessary for legitimate interests pursued by us or a third party and your interests and fundamental rights do not override those interests.

- 3.2. We may also use your personal information in the following situations, which are likely to be rare:

- 3.2.1. where we need to protect your interests (or someone else's interests).
- 3.2.2. where it is needed in the public interest.

- 3.3. We will only process "special category data" where a further condition is also met. Usually this will mean that you have given your explicit consent to the processing of such data (although sometimes we will process personal data when it is necessary for the establishment, exercise or defence of legal claims), or it is necessary for the purposes of carrying out obligations and exercising specific rights in employment law.

What are our legitimate interests or the legitimate interests of a third party?

- 3.4. We consider that in some circumstances the processing of your personal data is necessary for our, or a third party's, legitimate interests, which include:
 - 3.4.1. providing you with the goods or services that you have requested from us (where you are a customer of ours);
 - 3.4.2. ensuring that the information you provide us with is accurate and up-to-date at all times;
 - 3.4.3. for internal management purposes;
 - 3.4.4. record keeping;
 - 3.4.5. marketing purposes (where appropriate); and
 - 3.4.6. ensuring that you are kept up-to-date with matters that relate to our services.

4. **How and why we process your personal data**

- 4.1. We will process personal data about you for the purposes set out in Schedule 1 of this policy, depending on whether you are a customer, supplier, prospective employee, current employee or former employee.

Information about criminal convictions

- 4.2. We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our data protection principles.
- 4.3. We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of you working for us.
- 4.4. Your personal data is likely to be processed by us in both paper and electronic form.
- 4.5. We may process special category data relating to you including in order to comply with legal requirements and obligations to third parties.
- 4.6. We will only use your personal information 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 your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
- 4.7. Please note that we may process your personal information without your knowledge or consent where this is required or permitted by law.

5. **If you fail to provide personal information**

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit or delivering goods), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

6. **Only processing the personal data that we need to**

Your personal data will only be processed to the extent that it is necessary for the specific purposes we tell you about in this Privacy Policy.

7. **Ensuring your personal data is accurate**

We will keep the personal data we store about you accurate and up to date. We will take every reasonable step to erase or rectify inaccurate data without delay. Please tell us if your personal details change or if you become aware of any inaccuracies in the personal data we hold about you or anyone else. We will contact you if we become aware of any event which is likely to result in a change to your personal data.

8. **Retaining your personal data**

8.1. We will only retain your personal information 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.

8.2. 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 your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

8.3. In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee, worker or contractor of the company we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

9. **Automated decision-making**

9.1. Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

9.1.1. Where we have notified you of the decision and given you 21 days to request a reconsideration.

9.1.2. Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.

9.1.3. In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

9.2. If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

9.3. You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

9.4. We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

10. **What rights do you have in respect of your personal data?**

10.1. You have the right to:

10.1.1. Request access to any personal data we hold about you.

10.1.2. Have any personal data which we hold about you which is inaccurate rectified.

10.1.3. Have incomplete personal data completed.

10.2. In certain circumstances you also have the right to:

10.2.1. Have the processing of your personal data restricted.

10.2.2. Have personal data erased.

10.2.3. Be provided with the personal data that you have supplied to us, in a portable format that can be transmitted to another data controller without hindrance.

10.2.4. Object to certain types of processing, including automated processing (which includes profiling) and processing for direct-marketing purposes.

10.2.5. Not to be subject to a decision that is based solely on automated processing which produces a legal effect or which has a similar significant effect for you.

If you wish to exercise any of the rights set out above in paragraph 10.1 or 10.2, you should make the request in writing to Unit 1 Blakett Road, Blakett Industrial Estate, Darlington UK DL1 2BJ.

If you provided your consent to any aspect of the processing of your personal data, you have the right to withdraw your consent to that processing at any time, where relevant.

10.3. **You have the right to object, at any time:**

10.3.1. **to the processing of your personal data which:**

10.3.1.1. **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; or**

10.3.1.2. **which is necessary for the purposes of the legitimate interests pursued by us or a third party, including profiling.**

If you object to the processing set out in 10.3.1 above, we must no longer process that personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or that the processing is required for the establishment, exercise or defence of legal claims.

11. **How we keep your data secure**

- 11.1. We will ensure that appropriate measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.
- 11.2. We have in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction. We will only transfer personal data to a third party if that third party agrees to comply with those procedures and policies, or if they put in place adequate measures themselves.
- 11.3. Maintaining data security means guaranteeing the confidentiality, integrity and availability (for authorised purposes) of the personal data.

12. **Providing information to third parties**

We will share your personal information with third parties where required by law, where it is necessary to administer the working, business or commercial relationship with you or where we have another legitimate interest in doing so.

In addition to our employees, we also use service providers who may process personal data on our behalf (for example software providers for our IT systems, IT service providers, payroll, pensions and benefits administration). Apart from our employees and service providers, we will not disclose your personal data to a third party without your consent unless we are satisfied that they are legally entitled to the data. Where we do disclose your personal data to a third party, we will have regard to applicable laws and regulations.

We may disclose your personal information to third parties:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- if we or substantially all of our assets are acquired by a third party, in which case personal data held by us will be one of the transferred assets; and
- if we are under a duty to disclose or share your personal data in order to comply with legal obligations or to protect our rights, property, or safety of customers / users, suppliers or employees. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction (e.g. for the purpose of assessing the level of credit to be granted by us, if applicable).

If your personal data is provided to any third parties, you are entitled to request details of the recipients of your personal data or the categories of recipients of your personal data.

13. **Transferring your personal data outside the European Economic Area ("EEA")**

We will not transfer your personal data outside the EEA unless such transfer is compliant with the GDPR. This means that we cannot transfer any of your personal data outside the EEA unless:

- The EU Commission has decided that another country or international organisation ensures an adequate level of protection for your personal data; or

- The transfer of your personal data is subject to appropriate safeguards, which may include:
 - Binding corporate rules; or
 - Standard data protection clauses adopted by the EU Commission.
- One of the derogations in the GDPR applies (including if you explicitly consent to the proposed transfer).

We currently transfer personal data outside the EEA:

- [E.g. to carry out penetration testing of our systems and security processes];
- [e.g. as some personal data is stored on cloud systems, the servers for which are based outside the EEA];
- [to provide group companies based in the USA with certain information that is required for management purposes].

14. **Breaches of data protection principles**

If you consider that the data protection principles have not been followed in respect of personal data about yourself or others please notify us as soon as possible after becoming aware.

We are obliged to notify the Information Commissioners Office without undue delay, and where feasible, no later than 72 hours of becoming aware of a data breach, unless we consider that the personal data breach is unlikely to result in a risk to the rights and freedoms of the affected data subjects.

15. **Right to lodge a complaint**

If you have any issues with our processing of your personal data and would like to make a complaint, you can contact the Information Commissioner's Office on 0303 123 1113 or at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Schedule 1

PART 1 - SUPPLIERS

1. We will collect and process the following data about individuals from our suppliers:
 - 1.1. [name];
 - 1.2. [gender];
 - 1.3. [job title];
 - 1.4. [telephone number];
 - 1.5. [email address];
 - 1.6. [insert other personal data collected].
2. The information will be collected from:
 - 2.1. you directly; or
 - 2.2. a colleague of the individual at the supplier organisation.
3. The information we use is collected from inbound or outbound calls which we receive or make and/or manually completed paper forms and/or paper correspondence which we receive or send.
4. We process the personal data about you for the following purposes:
 - 4.1. to process the orders that we have made for goods and/or services from you, including purchase orders and invoices;
 - 4.2. to ensure that the goods and/or services can be delivered to our premises;
 - 4.3. to provide and help or support in respect of our orders; and
 - 4.4. [insert other reasons why you process supplier data]
5. Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

PART 2 – CUSTOMERS

6. We will collect and process the following data about customers:
 - 6.1. [name];
 - 6.2. [gender];
 - 6.3. [job title];
 - 6.4. [telephone number];
 - 6.5. [email address];
 - 6.6. [home address];

- 6.7. [insert other personal data collected].
7. The information will be collected from:
 - 7.1. you directly; or
 - 7.2. [insert other sources].
8. We process the personal data about you for the following purposes:
 - 8.1. to process the orders for goods and/or services that you have made with us, including purchase orders and invoices;
 - 8.2. to provide marketing information to you in respect of our goods and/or services;
 - 8.3. for after-sale services in respect of the goods / services you have purchased from us;
 - 8.4. for credit checking purposes, in certain circumstances;
 - 8.5. dealing with queries in respect of our goods / services;
 - 8.6. account management; and
 - 8.7. [insert other purposes / reasons why you process customer data].
9. Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

PART 3 – POTENTIAL EMPLOYEES, CURRENT EMPLOYEES AND FORMER EMPLOYEES

10. We will collect and process the following data about prospective, current and former employees:
 - 10.1. [Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses].
 - 10.2. [Date of birth].
 - 10.3. [Gender].
 - 10.4. [Marital status and dependants].
 - 10.5. [Next of kin and emergency contact information].
 - 10.6. [National Insurance number].
 - 10.7. [Bank account details, payroll records and tax status information].
 - 10.8. [Salary, annual leave, pension and benefits information].
 - 10.9. [Start date and, if different, the date of your continuous employment].
 - 10.10. [Leaving date and your reason for leaving].

- 10.11. [Location of employment or workplace].
 - 10.12. [Copy of driving licence].
 - 10.13. [Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process)].
 - 10.14. [Employment records (including job titles, work history, working hours, holidays, training records and professional memberships)].
 - 10.15. [Compensation history].
 - 10.16. [Performance information].
 - 10.17. [Disciplinary and grievance information].
 - 10.18. [CCTV footage and other information obtained through electronic means such as swipe card records].
 - 10.19. [Information about your use of our information and communications systems].
 - 10.20. [Photographs].
 - 10.21. [Results of HMRC employment status check, details of your interest in and connection with the intermediary through which your services are supplied].
 - 10.22. We may also collect, store and use the following more sensitive types of personal information (known as special category data):
 - 10.23. [Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions].
 - 10.24. [Trade union membership].
 - 10.25. [Information about your health, including any medical condition, health and sickness records, including:
 - 10.26. where you leave employment and under any share plan operated by a group company the reason for leaving is determined to be ill-health, injury or disability, the records relating to that decision;
 - 10.27. details of any absences (other than holidays) from work including time on statutory parental leave and sick leave; and
 - 10.28. where you leave employment and the reason for leaving is related to your health, information about that condition needed for pensions and permanent health insurance purposes].
 - 10.29. [Genetic information and biometric data].
 - 10.30. [Information about criminal convictions and offences].
11. The information may be collected:

- 11.1. through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies;
 - 11.2. from new employers once you have left employment with us; and
 - 11.3. [We may also collect personal information from the trustees or managers of pension arrangements which we administer in relation to you].
12. We will collect additional personal information in the course of job-related activities throughout the period of you working for us and occasionally certain other personal information from you after you have left your employment with us.
13. **If you are a former employee, we may need to access your email account for business continuity, handover and legal purposes. This processing is in our legitimate interests. We will access your email account in the least intrusive manner possible, ensuring that only those staff who need access to your email account have access. If you have used your work email account for personal emails, we will do our utmost to ensure that we do not access such personal emails but we cannot guarantee that this will be the case. You should therefore ensure that personal emails are deleted from your email account before your employment with us finishes, or your personal emails are clearly distinguished from work-related emails.**
14. We process the personal data about you for the following purposes:
 - 14.1. to make decisions about your recruitment or appointment;
 - 14.2. to determine the terms on which you work for us;
 - 14.3. to check that you are legally entitled to work in the UK;
 - 14.4. to pay you and, if you are an employee or deemed employee for tax purposes, deducting tax and National Insurance contributions (NICs);
 - 14.5. to provide the following benefits to you:
 - 14.6. to invite you to participate in any share plans operated by a group company;
 - 14.7. to grant awards under any share plans operated by a group company;
 - 14.8. to administer your participation in any share plans operated by a group company, including communicating with you about your participation and collecting any tax and NICs due on any share awards;
 - 14.9. to enrol you in a pension arrangement in accordance with our statutory automatic enrolment duties;
 - 14.10. to liaise with the trustees or managers of a pension arrangement operated by a group company, your pension provider and any other provider of employee benefits;
 - 14.11. to administer the contract we have entered into with you;

- 14.12. for business management and planning, including accounting and auditing;
- 14.13. to conduct performance reviews, managing performance and determining performance requirements;
- 14.14. for making decisions about salary reviews and compensation;
- 14.15. for assessing qualifications for a particular job or task, including decisions about promotions;
- 14.16. to gather evidence for possible grievance or disciplinary hearings;
- 14.17. to make decisions about your continued employment or engagement;
- 14.18. for making arrangements for the termination of our working relationship;
- 14.19. for your education, training and development requirements.
- 14.20. to deal with legal disputes involving you, or other employees, workers and contractors, including accidents at work;
- 14.21. for ascertaining your fitness to work;
- 14.22. to manage sickness absence;
- 14.23. to comply with health and safety obligations;
- 14.24. for prevention of fraud;
- 14.25. to monitor your use of our information and communication systems to ensure compliance with our IT policies;
- 14.26. to ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution;
- 14.27. to conduct data analytics studies to review and better understand employee retention and attrition rates;
- 14.28. If you leave employment and under any share plan operated by a group company the reason for leaving is determined to be ill-health, injury or disability, we will use information about your physical or mental health, or disability status in reaching a decision about your entitlements under the share plan;
- 14.29. If you apply for an ill-health pension under a pension arrangement operated by a group company, we will use information about your physical or mental health in reaching a decision about your entitlement;
- 14.30. We will use trade union membership information to pay trade union premiums, register the status of a protected employee and to comply with employment law obligations; and
- 14.31. We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

14.32. Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.