

Euromedia Associates Limited

GDPR POLICY

This GDPR policy relates to Euromedia Associates Limited and aims to ensure that all personal data collected about employees and third parties is collected, stored and processed in accordance with the United Kingdom General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 (DPA 2018)

This policy applies to all personal data, regardless of whether it is in paper or electronic format. It meets the requirements of the UK GDPR and the expected provisions of the DPA 2018.

It is based on guidance published by the Information Commissioner's Office (ICO) on the UK GDPR. During the course of its activities Euromedia Associates Ltd will process personal data (which may be held on paper, electronically, or otherwise) about employees and third parties with due compliance to GDPR regulations.

Euromedia Associates Ltd recognises the need to treat personal data in an appropriate and lawful manner, in accordance with the expected provisions of the Data Protection Act 2018 (DPA 2018) as set out in the Data Protection Law and associated Information Commissioner's Office. This policy is the responsibility of Sheila Helm and Lorraine Jones, with ultimate responsibility being with Emma Hatherall and Anthony Curtis.

Regarding Employee data:

This notice explains what personal data (information) we hold about you, how we collect it, and how we use and may share information about you during your employment and after it ends. We are required to notify you of this information under data protection legislation. Please ensure that you read this notice (sometimes referred to as a 'privacy notice') and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

Who collects the information?

Euromedia Associates Ltd is a 'data controller' and gathers and uses certain information about you.

Data protection principles

We will comply with the data protection principles when gathering and using personal information and will take immediate action if compliance is not met at any time.

About the information we collect and hold.

What information

We may collect the following information during your employment:

- Your name, contact details (i.e., address, home and mobile phone numbers, email address) and emergency contacts (i.e., name, relationship and home and mobile phone numbers).
- Information collected during the recruitment process that we retain during your employment.
- Employment contract information.
- Details of salary and benefits, bank/building society, National Insurance and tax information, your age.
- Details of your spouse/partner and any dependents.
- Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information.
- A copy of your driving license.
- Details of your share incentive arrangements, and all information included in these and necessary to implement and administer them.
- Details of your pension arrangements, and all information included in these and necessary to implement and administer them.
- Information in your sickness and absence records (including sensitive personal information regarding your physical and/or mental health).
- Your racial or ethnic origin, sex, and sexual orientation, religious or similar beliefs.
- Criminal records information, including the results of Disclosure and Barring Service (DBS) checks.
- Your trade union membership.
- Information on grievances raised by or involving you.
- Information on conduct and/or other disciplinary issues involving you.
- Details of your appraisals and performance reviews.
- Details of your performance management/improvement plans (if any).
- Details of your time and attendance records.
- Information regarding your work output.
- Information in applications you make for other positions within our organisation.
- Information about your use of our IT, communication and other systems, and other monitoring information.

- Details of your use of business-related social media, such as LinkedIn.
- Your use of public social media (only in very limited circumstances, to check specific risks for specific functions within our organisation; you will be notified separately if this is to occur); and
- Details in references about you that we give to others.

Certain of the categories above may not apply to you if you are a worker, agency worker, independent contractor, freelancer, volunteer, intern.

How we collect the information

We may collect this information from you, your personnel records, the Home Office, pension administrators, your doctors, from medical and occupational health professionals we engage and from our insurance benefit administrators, the DBS, your trade union, other employees, consultants and other professionals we may engage, e.g. to advise us generally and/or in relation to any grievance, conduct appraisal or performance review procedure, time management system, time clock records, computer monitoring (including though not limited to): keystrokes and mouse movements, screen capture, application logs, webcams], automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, remote access systems, email and instant messaging systems, Internet facilities, telephones, voicemail, mobile phone records. If driving. Driver monitoring systems including trackers and “dash cams”.

Why we collect the information and how we use it

We will typically collect and use this information for the following purposes (other purposes that may also apply are explained in our data protection policy

- for the performance of a contract with you, or to take steps to enter into a contract.
- for compliance with a legal obligation (e.g., our obligations to you as your employer under employment protection and health safety legislation, and under statutory codes of practice, such as those issued by Acas); and
- for the purposes of our legitimate interests or those of a third party (such as a benefits provider), but only if these are not overridden by your interests, rights, or freedoms.

Further information on the monitoring we undertake in the workplace and how we do this is available in our handbook and/or covered in policies including in, though not restricted to, the Use of Internet and Email policy and the Use of company vehicles and use of own vehicles on company business policy. If you are unsure about what monitoring is undertaken, you should speak with <insert name>.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any material changes to information we collect or to the purposes for which we collect and process it.

How we may share the information

We may also need to share some of the above categories of personal information with other parties, such as external contractors and our professional advisers and with potential purchasers of some or all of our business or on a re-structuring. Usually, information will be anonymised, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations. We may also be required to share some personal information with external Organisation's as required to comply with the law.

Where information may be held

Information may be held at our offices and those of our group companies, and third-party agencies, service providers, representatives and agents as described above. We have security measures in place to seek to ensure that there is appropriate security for information we hold.

How long we keep your information

We keep your information during and after your employment for no longer than is necessary for the purposes for which the personal information is processed.

Your rights allow you to correct and access your information and to ask for it to be erased. Please contact our Data Protection Officer if (in accordance with applicable law) you would like to correct or request access to information that we hold relating to you or if you have any questions about this notice. You also have the right to ask for some, but not all, of the information we hold and process to be erased (the 'right to be forgotten') in certain circumstances. Our Data Protection Officer will provide you with further information about the right to be forgotten if you ask for it.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Regarding third party data:

Privacy Policy of www.euromediaal.com

The Application collects some Personal Data from its Users.

Owner and Data Controller

Euromedia Associates Ltd,10 Ashfield Rd, Chorley PR7 1LJ

Owner contact email: dataprotection@euromediaal.com

Types of Data collected

Among the types of Personal Data that this Application collects, by itself or through third parties, there are: Cookies; Usage Data; email address; first name; last name; phone number; ZIP/Postal code; address; company name; website.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Application.

Unless specified otherwise, all Data requested by this Application is mandatory and failure to provide this Data may make it impossible for this Application to provide its services. In cases where this Application specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner. Any use of Cookies – or of other tracking tools – by this Application or by the owners of third-party services used by this Application serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy, if available.

Users are responsible for any third-party Personal Data obtained, published or shared through this Application and confirm that they have the third party's consent to provide the Data to the Owner.

Mode and place of processing the Data

Methods of processing

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Application (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes. Note: Under some legislations the Owner may be allowed to process Personal Data until the User objects to such processing (“opt-out”), without having to rely on consent or any other of the following legal bases. This, however, does not apply, whenever the processing of Personal Data is subject to European data protection law;
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;

- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular, whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or inquire with the Owner using the information provided in the contact section.

Retention time

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfil such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Analytics, Contacting the User and Interaction with external social networks and platforms.

For specific information about the Personal Data used for each purpose, the User may refer to the section “Detailed information on the processing of Personal Data”.

Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

- **Analytics**
- **Contacting the User**
- **Interaction with external social networks and platforms**

The rights of Users

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Further details are provided in the dedicated section below.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right, under certain circumstances, to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right, under certain circumstances, to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that the Data is processed by automated means and that the processing is based on the User's consent, on a contract which the User is part of or on pre-contractual obligations thereof.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification. To learn, whether the

Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. These requests can be exercised free of charge and will be addressed by the Owner as early as possible and always within one month.

Additional information about Data collection and processing

Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of this Application or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

Additional information about User's Personal Data

In addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

System logs and maintenance

For operation and maintenance purposes, this Application and any third-party services may collect files that record interaction with this Application (System logs) use other Personal Data (such as the IP Address) for this purpose.

Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

How “Do Not Track” requests are handled

This Application does not support “Do Not Track” requests.

To determine whether any of the third-party services it uses honor the “Do Not Track” requests, please read their privacy policies.

Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within this Application and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.