

1 PRIVACY POLICY

Data protection is of a particularly high priority for the management of EGS (International) Limited (EGSi). As the Data Controller, EGSi has implemented organisational measures to ensure the most complete protection of personal data processed.

The processing of personal data shall always be in line with the General Data Protection Regulation (GDPR). By means of this Privacy Policy, EGSi would like to inform you of the nature, scope, and purpose of the personal data we collect, use and process. Furthermore, you are informed, by means of this Privacy Policy, of the rights to which you are entitled.

What personal data we collect

We may collect the following personal information:

- names and addresses
- job titles
- contact information (for example address, email address, telephone number)
- information required to carry out services we are engaged in with you
- correspondence with the Company and other information provided by you to the Company
- marketing and communications data

How is your personal data collected?

We use different methods to collect personal data from and about you through:

- direct interactions – by filling in forms, exhibitions, meetings, events, corresponding by email, phone or post
- via our website – we may automatically collect technical data by using cookies, analytics, documents and forms
- third parties, or publicly available sources such as LinkedIn

Why we collect your personal data

The main reasons we collect and process your personal information is to either allow us to perform our contractual duties, thereby fulfilling our legal obligations, or because we believe you have a legitimate interest in our services and we want to market them to you.

How we use your personal data

The most common uses of your personal data are:

- where we need to perform the contract between us
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests
- where we need to comply with a legal or regulatory obligation

We may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data.

Purpose/Activity	Lawful basis for processing
To register you as a new customer	<ul style="list-style-type: none"> • Performance of a contract with you
Manage payments, fees and charges	<ul style="list-style-type: none"> • Performance of a contract with you
Collect and recover money owed to us	<ul style="list-style-type: none"> • Necessary for our legitimate interests to recover debts owed to us
To make suggestions and recommendations to you about services that may be of interest to you	<ul style="list-style-type: none"> • Necessary for our legitimate interests to develop our services and grow our business

Transfer of personal data

We may disclose some information we hold about you to other EGS Group companies, company employees, external service providers, suppliers, subcontractors and clients. Third party recipients of your personal data are only permitted to use the information for the services or function for which they have been engaged and are required to have in place reasonable safeguards for protecting personal information.

We may transfer or disclose personal information to regulatory bodies, government agencies and law enforcement bodies and other parties as permitted or required by law.

EGSi ensures that sufficient levels of data protection are maintained through appropriate safety measures for transferring personal data.

International transfer

We do not generally transfer your personal data outside the EU however, when we do so, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission
- where we use external service providers, suppliers, subcontractors and clients, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe
- where we use external service providers, suppliers, subcontractors and clients based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US

Your legal rights in relation to personal data

You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you 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 your personal data. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms
- **Request restriction** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it
- **Request the transfer** of your personal data to you or a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note this only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you
- **Withdraw consent** at any time where we are relying on consent to process your personal data

Securing personal data

EGSi takes reasonable and appropriate steps, and require our third parties to take reasonable and appropriate steps, to protect personal information from misuse, loss and unauthorised access, modification or disclosure using physical, electronic and procedural safeguards. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Retention of personal data

EGSi only retain personal data for as long as it is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements. When determining 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 requirement. We will retain accounting transactions for 7 years.

Name and Address of the controller

The Data Controller for the purposes of the General Data Protection Regulation (GDPR), other data protection laws applicable in Member states of the European Union and other provisions related to data protection is:

EGS (International) Limited
 27 Woolmer Way
 Bordon
 Hants
 GU35 9QE

Email: gdpr@egssurvey.co.uk

You may opt out of receiving marketing communications from us at any time by contacting gdpr@egssurvey.co.uk

We will not use your personal information for any other purpose than those stated in this privacy Policy unless you consent to such other use.

Privacy Contact Information

If you have any queries or you wish to speak to us about how your information will be used, then please contact EGSi at gdpr@egssurvey.com Tel +44 1420 489329.

In the event that you should have a complaint about how your data has been processed by us, we would like to hear from you so that we may put it right. However, you will always have the right to lodge a complaint with the Information Commissioner's Office(ICO), the UK supervisory authority for data protection issues www.ico.org.uk.

We reserve the right to make changes to this policy.