

WORKER PRIVACY POLICY

THE COMPANY'S LEGAL OBLIGATIONS

Momentum Instore Limited (referred to in this document as “we” or the “Company”) is committed to protecting the privacy and security of your personal information. This privacy policy includes privacy notices and describes how we collect and use personal information about you during and after your working relationship with us, in accordance with data protection laws and the General Data Protection Regulation (GDPR).

It applies to all workers of the Company. This privacy policy does not form part of any contract to provide services. It is important that you read this Policy, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

CONTACT DETAILS

The Company's contact details are:

Momentum Instore Limited, Beechwood Court, Springwood Way, Tytherington Business Park, Tytherington, Macclesfield, SK10 2XG.

The Company is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you.

For enquiries regarding this Policy, see Contact Us at the end of this document.

GDPR AND DATA PROTECTION LAWS

GDPR, which takes effect from 25 May 2018, will establish a single pan-European law for data protection and will enable individuals to better control their personal data, regardless of where this data is sent, stored or processed.

The Company has to comply with the provisions of GDPR when keeping personal data about our workers in a computer or in certain filing systems and when we obtain, use, disclose or otherwise process such data.

The Company collects and processes personal data relating to its workers to manage the working relationship. The Company is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

We are required to comply with data protection law and principles, which means that your personal data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any

way that is incompatible with those purposes.

- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

THE KIND OF INFORMATION WE HOLD ABOUT YOU

We collect and use the following kinds of information:

- Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).
- Special categories of personal data. GDPR describes the following types of personal data as 'special categories of personal data' - information concerning racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health or condition, sexual life or sexual orientation), genetic or biometric data and commission or alleged commission of any criminal offence. The Company needs to handle some of these special categories of both sensitive personal data and other types of personal data about our workers in the ways described below in this Policy.

DATA PRIVACY MANAGER

The Data Privacy Managers for the business are:

Danielle Dixon and Mike Lockey

The Data Privacy Managers will inform and advise on GDPR, monitor compliance within the organisation, cooperate & liaise with the ICO and be the point of contact for data subjects.

WHAT PERSONAL DATA DO WE PROCESS?

We collect, store and process a range of personal information about you. This includes:

CONTACT

- Your name, address and contact details, including email address and telephone number;

IDENTITY

- date of birth and gender;
- information about your marital status, next of kin, dependants and emergency contacts;
- information about your nationality and entitlement to work in the UK;

FINANCIAL

- information about your pay, including entitlement to pensions;
- details of your bank account and national insurance number;

TERMS AND HISTORY

- the terms of engagement between you and the Company including your start date;
- details of your qualifications, skills, experience and work history, including start and end dates, with previous companies and with the organisation;

PERFORMANCE

- details of your work schedule and attendance when working on assignments for the Company;
- details of periods of leave taken by you, including holiday and sickness;
- details of any transgressions or complaints procedures in which you have been involved, including any letters issued to you and related correspondence;
- assessments of your skill level and related correspondence

TECHNICAL

- details held at DVLA of your driving license (which has been explicitly granted by you);

We may also collect, store and process the following “special categories” of more sensitive personal information. Further details on why and how we use such sensitive data are detailed below under the heading “Special Categories of sensitive data”:

MEDICAL AND HEALTH

- information about medical or health conditions, including whether or not you have a disability for which we need to make reasonable adjustments;

SENSITIVE

- information about your race, nationality or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation;
- Criminal records.

HOW WE COLLECT YOUR PERSONAL INFORMATION

We may collect this information in a variety of ways. For example, data might be collected through application forms, CVs; obtained from your passport or other identity documents such as your driving licence; from forms completed by you; from correspondence with you; or through interviews, meetings or other assessments.

In some cases, we may collect personal data about you from third parties, such as references supplied by former companies you have worked for.

We will collect additional personal information in the course of job-related activities throughout the period of you working for us.

Data will be stored in a range of different places, including in your workers file (stored at Head Office under lock and key), in the organisation's Payroll folders/software and in other IT systems such as our in house project tracking system, Insite. Data will be held in both hard format and electronically.

Records may also be kept in places other than the workers file. For example, the HR/Recruitment department may keep central records and Field Managers may also hold some records about a worker.

USE OF DATA

HOW WE USE INFORMATION ABOUT YOU

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 (each of these circumstances can also be referred to as a "basis" of processing:

1. Where we need to perform the contract we have entered into with you.
2. Where we need to comply with a legal obligation.
3. 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.

We may also use your personal information in the following situations, which are likely to be less common:

1. Where we need to protect your vital interests (or someone else's interests).
2. Where it is needed in the public interest or for official purposes.
3. 3 Where we have obtained your consent.

We process the categories of information in the list above (see *Paragraph* above headed "What personal data do we process?") for a number of purposes:

- to perform our contract for services with you. For example, we need to process your data to pay you in accordance with this contract and to administer pension entitlements; and/or
- to comply with our legal obligations. For example, we are required to check a worker's entitlement to work in the UK, to deduct tax, to comply with health and safety laws and to enable workers to take periods of leave to which they are entitled; and/or

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- and to protect the vital interests of the worker or another person;
- to pursue legitimate interests of our own or those of third parties before, during and after the end of the engagement, provided your interests and fundamental rights do not override those interests.

Our **legitimate interests** would include, for example: to detect and prevent fraud and crime; administrative purposes; reporting potential crimes to relevant authorities; intra group transfers; worker administration, operations and recruitment of workers; ensuring network, information and system security; participate and comply with industry watch-lists and industry self-regulatory schemes; corporate operations and due diligence (reporting of management information, operation of financial/risk/credit models, back office operation, managing third party service providers, corporate reorganisations); to carry out our core business and supply services to our customers; bringing or responding to legal claims or proceedings to protect the Company’s tangible or intangible assets or interests.

We have set out below, in a table format, a description of all the ways and situations we will process your personal data, and which lawful basis we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that 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	Type of Data More detail about each type of data listed in this column below are explained under “What Personal Data do we process?”	Lawful basis for processing including basis of legitimate interest
Make a decision about your recruitment or appointment.	Contact Identity Terms and History Performance Technical Financial Sensitive	<i>Processing personal data for this purpose is necessary for our legitimate interest (worker administration, operations and recruitment). Where we have obtained your clear consent to process personal data for this purpose, consent shall be the basis for processing.</i>
Determine the terms on which you work for us.	Contact Identity Terms and History Technical Financial	<i>Processing personal data for this purpose is necessary for our legitimate interest (worker administration, operations and recruitment).</i>
Provide you with a contract for services, pay you in accordance with your	Contact Identity Terms and History	<i>Processing personal data for these purposes is necessary to enter into and perform the</i>

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<p>contract/the law and to administer pension entitlements.</p>	<p>Performance Technical Financial Medical, Health and Sickness</p>	<p><i>contract for services and for the Company to comply with its legal obligations.</i></p>
<p>Check a workers entitlement to work in the UK.</p>	<p>Contact Identity</p>	<p><i>Processing personal data for this purpose is necessary to comply with its legal obligations and is necessary for our legitimate interests (worker administration, operations and recruitment).</i></p>
<p>Maintain accurate and up-to-date work records and contact details (including details of who to contact in the event of an emergency).</p> <p>Note: When a worker starts work, details of an emergency contact and your home and mobile telephone numbers will be requested. The Company might call a workers home or mobile telephone number in any situation where this might be helpful, for example, to ask about a work related matter or ensure the workers safety.</p>	<p>Contact Identity Terms and History Performance Technical Financial Medical, Health and Sickness Other Sensitive</p>	<p><i>Processing personal data for these purposes is necessary to perform the contract for services, to comply with our legal obligations and to protect the vital interests of the worker.</i></p>
<p>Business management and planning, including accounting and auditing.</p>	<p>Contact Terms and History Performance Financial</p>	<p><i>Processing personal data for these purposes is necessary to perform the contract for services, for the Company to comply with its legal obligations, for our legitimate interests (corporate operations and due diligence; worker administration, operations and recruitment) and to protect the vital interests of the worker.</i></p>
<p>Operate and keep a record of transgressions and complaints to ensure acceptable conduct within the workplace.</p>	<p>Contact Terms and History Performance Technical Financial Other Sensitive</p>	<p>The Company keeps records relating to complaints raised by workers and may take notes of any conversations or meetings in which concerns are raised. This is to ensure that the Company is complying with its duties.</p>

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		Records and documents relating to this are also kept on worker files. <i>Processing personal data for these purposes is necessary to perform the contract for services and is necessary for our legitimate interests (worker administration, operations and recruitment)</i>
<p>Operate and keep a record of worker skill levels and related processes for work scheduling purposes.</p> <p>Note: During your engagement with the Company, we will keep a record of your skill level to ensure we are offering you the right assignments in accordance with your knowledge and experience. This information will be kept on a workers file and on Insite.</p>	<p>Contact Terms and History Performance Technical Financial</p>	<p><i>Processing personal data for this purpose is necessary to perform the contract for services and is necessary for our legitimate interests (worker administration, operations and recruitment).</i></p>
<p>Operate and keep a record of absence, to allow effective workforce management and ensure that workers are receiving the pay they are entitled to.</p> <p>Note: The Company keeps absence records on our Payroll software and Insite. The Company may also collect records of workers starting, finishing and working times (from timesheets), particularly when considered appropriate for managing work/pay or in order to comply with the Working Time Regulations or other laws.</p>	<p>Contact Terms and History Performance Financial Medical, Health and Sickness</p>	<p><i>Processing personal data for this purpose is necessary to perform the contract for services and for the Company to comply with its legal obligations.</i></p>
<p>Obtain occupational health/GP advice, to ensure that it complies with duties in relation to individuals with</p>	<p>Contact Identity Terms and History Performance</p>	<p><i>Processing personal data for these purposes is necessary to perform the contract for services, for the Company to</i></p>

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<p>disabilities, meet its obligations under health and safety law, and ensure that workers are receiving the pay or other benefits to which they are entitled.</p> <p>Note: Throughout your engagement with the Company, we are likely to gain additional information about a workers health. Such information may come from health questionnaires, fit notes or medical reports, from self-certification forms, from what is told to the Company and from the observations of fellow workers. It may also come from medical reports or tests requested by the Company. The Company uses such information about health for the purposes of administering pay, judging capacity to work and complying with our duties towards workers. Such information is likely to be kept on a workers file. If a worker has particular concerns over who may have access to any specific information relating to his/her health please discuss this with a member of the HR Department.</p>	<p>Technical Financial Medical, Health and Sickness</p>	<p><i>comply with its legal obligations and to protect the vital interests of the worker or another person.</i></p> <p>Some special categories of personal data, such as information about health or medical conditions, is processed for the above purposes and is necessary for the purposes of carrying out the obligations and exercising specific rights of the Company or the worker in the field of employment law (such as those in relation to workers with disabilities) and to protect the vital interests of the worker or another person (see further under “Special Categories of sensitive data”).</p>
<p>Obtain/provide references on request for current or former workers.</p>	<p>Contact Terms and History Performance</p>	<p><i>Processing personal data for this purpose is necessary to enter into and perform the contract for services to comply with legal obligations and for our legitimate interests (worker administration, operations and recruitment).</i></p>
<p>Respond to and defend against legal claims.</p>	<p>Contact Terms and History Performance Technical Financial</p>	<p><i>Processing personal data for this purpose is necessary for the Company to comply with its legal obligations and is necessary for our legitimate</i></p>

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	Medical, Health and Sickness Other Sensitive	<i>interests (bringing or responding to legal claims or proceedings to protect the Company's tangible or intangible assets or interests.)</i>
Deal with legal disputes involving you, or employees, other workers and contractors, including accidents at work.	Contact Identity Terms and History Performance Technical Financial Medical, Health and Sickness	<i>Processing personal data for this purpose is necessary for the Company to comply with its legal obligations, perform the contract for services and for the Company's legitimate interests (bringing or responding to legal claims or proceedings to protect the Company's tangible or intangible assets or interests; worker administration, operations and recruitment).</i>
Complying with health and safety obligations.	Contact Terms and History Technical Medical, Health and Sickness	<i>Processing personal data for this purpose is necessary for the Company to comply with its legal obligations and perform the contract for services.</i>
To prevent fraud.	Contact Identity Terms and History Technical Financial Medical, Health and Sickness Other Sensitive	<i>Processing personal data for this purpose is necessary for the Company to comply with its legal obligations, perform the contract for services and for the Company's legitimate interests (to prevent fraud).</i>
Ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.	Contact Terms and History	<i>Processing personal data for this purpose is necessary for the Company to comply with its legal obligations, perform the contract for services and for the Company's legitimate interests (ensuring network, information and system security);</i>
Equal opportunities monitoring.	Contact Terms and History Other Sensitive	<i>Processing personal data for this purpose is necessary for the Company to comply with its legal obligations, perform the contract for services and for the Company's legitimate interests (worker</i>

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		<i>administration, operations and recruitment);</i>
<p>Check criminal records.</p> <p>Note: The worker will be asked to detail any unspent criminal convictions on their New Starter paperwork. If the Company learns (from any source) that a worker has been convicted or is suspected of a criminal offence, the Company will use this information only in limited circumstances. For example, the Company may use it to terminate a workers contract if it is considered that it may affect the workers ability to do his/her job or the Company's reputation.</p>	<p>Contact Identity Terms and History Technical Other Sensitive</p>	<p><i>Processing personal data for this purpose is necessary to perform the contract for services to comply with legal obligations, to protect the Company's legitimate interests (worker administration, operations and recruitment) and to protect the vital interests of the worker or another person.</i></p>

Criminal records: We may collect data about your criminal convictions but only use information relating to criminal convictions where the law allows us to do so and in accordance with GDPR. This will usually be where such processing is necessary to carry out our legal obligations. Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

IF YOU FAIL TO PROVIDE PERSONAL INFORMATION

Certain information, such as contact details, your right to work in the UK and payment details, have to be provided to enable us to enter into and perform a contract for services with you. If you do not provide information, this will hinder the organisation's ability to administer the rights and obligations arising as a result of the working relationship efficiently.

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 we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

CHANGE OF PURPOSE

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.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

SPECIAL CATEGORIES OF SENSITIVE DATA

“Special categories” of sensitive personal information (some of which have been mentioned above under the headings “The kind of information we hold about you” and “How we use information about you”) require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations or exercise rights in connection with worker engagement.
3. Where it is needed in the public interest, such as for equal opportunities monitoring.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else’s interests) and you are not capable of giving your consent, or where you have already made the information public.

OUR OBLIGATIONS AS AN EMPLOYER

We will use your sensitive personal information in the following ways:

- information about your nationality to comply with employment and other laws;
- information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with laws
- 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.

DO WE NEED YOUR CONSENT?

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can

carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

The Company's policy is to ensure that the information held on a workers file is relevant, accurate and not excessive.

ACCESS TO DATA

In order for the Company to carry out the points listed above (under How we use information about you), your information will be shared internally on a need to know basis. This includes with members of the HR/Recruitment and Payroll Team, Project Teams, Field Management Team, managers in the business area in which you work and IT/H&S/Fleet staff if access to the data is necessary for performance of their roles. Access to held information is restricted on a need to know basis.

THIRD PARTIES

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

We share your data with third parties in order to provide and obtain references from other organisations.

We also share some of your data with third parties that process data on its behalf, in connection with payroll. For example:

- The organisation will need to share some of your personal information with NEST (workplace pension scheme) for pension purposes. Processing personal data for this purpose is necessary to perform the contract for services and for the Company to comply with its legal obligations.
- If you wish to drive our hire vehicles when carrying out assignments for the Company we will need to share relevant details with Drivercheck and Europcar e.g. driving licence number etc. in order to hire you a vehicle – we must ensure you are qualified to drive and covered under our insurance policy. By driving one of our hire vehicles you understand that any fines you incur will be your responsibility and as such we may also need to share your name with Parking Fine Companies for them to pursue this with you. Processing personal data for this purpose is necessary to perform the contract for services and for the Company to comply with its legal obligations.
- Your address and phone number will be shared with our Uniform provider to enable the Company to deliver your uniform to you ahead of any assignments you have agreed to do – the Courier Company may need to contact you to facilitate the delivery. Processing personal data for this purpose is necessary to perform our contract for services with you and for our legitimate interests (to carry out our core business and supply services to our customers).
- We may share your name with clients prior to a project you are working on so they know who to expect on site for operational and health and safety reasons. Processing personal

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data for this purpose is necessary to perform our contract for services with you, to comply with our legal obligations and to protect the vital interests of the worker.

- Your relevant personal data may be shared with HMRC and the Police should the Company receive any such requests in writing. Managers dealing with these requests will confirm that the request has come from a trusted party before any details are disclosed and will only send relevant need to know information for them to carry out whatever checks they need to. We may also be required to share information when the Company is in situations where there is a statutory duty or Court Order requiring the information to be shared. Processing personal data for this purpose is necessary for the Company to comply with its legal obligations.
- Project Teams will need to share your name with Priority & Hotels to confirm accommodation bookings and your passport details with other travel providers (airlines, train operators, ferries etc.) where travel/accommodation is required to be booked as part of a project. Processing personal data for this purpose is necessary to perform our contract for services with you and for our legitimate interests (to carry out our core business and supply services to our customers).
- Project Teams may need to share your passport details when applying for permits/access to store. For example, if you are working at an airport it would be shared with the British Airport Authority. Processing personal data for this purpose is necessary to perform our contract for services with you and for our legitimate interests (to carry out our core business and supply services to our customers).
- Project Teams may need to share your contact number &/or email address with other workers who are working on the same project(s) as you. This is necessary to coordinate times to meet, provide Microsoft 'Teams' training, or communicate project updates via WhatsApp etc. Processing personal data for this purpose is necessary to perform our contract for services with you and for our legitimate interests (to carry out our core business and supply services to our customers). Your mobile number &/or email address may be used in Microsoft Teams &/or WhatsApp & will be visible to other workers scheduled on the same project.
- Project Teams may need to share drivers contact numbers with passengers within the planned carpool and vice versa. The purpose of this is so you can make arrangements to organise lifts and know who to pick up/who is picking you up to travel to the store/hotel. Processing personal data for this purpose is necessary for operational reasons and to perform our contract for services with you and for our legitimate interests (to carry out our core business and supply services to our customers).

We require third parties to respect the security of your data and to treat it in accordance with the law.

We have put in place measures to protect the security of your information. Details of these measures are available on request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We will not transfer your data to countries outside the European Economic Area without your further explicit consent.

CCTV - When you attend the premises of our clients in order to carry out your duties, our client may collect personal data relating to your performance of your duties (for example monitoring via CCTV). The processing of such data is the responsibility of our client. We are not responsible for the processing of such data.

PROTECTION OF DATA

We take the security of your data with the utmost importance. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed in an unauthorised way. The ability to access data is restricted to employees, agents, contractors and other third parties who have a business need to know. Some of the key measures in place to ensure this include:

- The ability to access data is restricted on a need to know basis. AD security groups are used to permission sensitive server data and Access Control Groups are used on our extranets.
- SSL certificates are used on all our sites as standard, to ensure data in transit is encrypted
- All Insite system data is subject to back-up at transaction level throughout each day, and full back-up is performed each morning. All server data is backed up using Veeam using the 3-2-1 methodology and copies stored offsite.
- Insite SQL servers are mirrored, with automatic failover (Microsoft Azure servers based in the EU)
- Sophos End Point Protection software protects all PCs\Laptops
- Server based data sits behind a WatchGuard M370 firewall with IDP & an active subscription
- AD policy is that all user account lockout automatically after 3 failed password attempts. Accounts can only be unlocked by a member of the IT team. Network passwords have to be at least 8 characters in length and contain at least one uppercase character and a number. These expire every 30 days.
- All laptops and mobile devices are encrypted and the use of non-encrypted removable storage media is prohibited (via a Sophos Device Control policy)
- A clean desk policy is in place

Where we engage third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

DATA RETENTION PERIODS

We will hold your personal data for the duration of your engagement with the Company.

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.

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.

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 a worker of the Company we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

If the Company provides a reference about you, our practice is to ask the recipient to keep it confidential. In preparing a reference the Company may use any records or information held on the worker for this purpose.

Worker files and payroll details will be reviewed to check for inaccuracies, update old information and remove information that is no longer required.

RIGHTS OF INDIVIDUALS

As a data subject, under certain circumstances, you have a number of rights:

- **Request access** - You can access and obtain a copy of your data on request (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Correction** - You can require us to change incorrect or incomplete data we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Erasure** - You can require us to delete or stop processing your personal data, for example where the data is no longer necessary for the purposes of processing. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** - You can object to the processing of your personal data where the organisation is relying on its legitimate interests (or those of a third party) as the legal ground for processing;
- **Request the restriction of processing** - You can request the restriction of processing. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.;

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- **Transfer request** - You can request the transfer of your personal information to another party;
- **Automated Decision- Making**

You have the right not to be subject to a decision based solely on automated processing (Automated Decision-Making), which produces either legal or other significant effects. Automated Decision-Making takes place when an electronic system uses personal information to make a decision without human intervention. Examples of this are:

- Automatic rejection of candidates when recruiting online if they do not have certain qualifications
- A 'trigger' in a procedure for sickness absence

We are allowed to use automated decision-making in the following circumstances:

- Where we have notified you of the decision and given you 21 days to request a reconsideration.
- Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.
- In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

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.

All data subject access requests from individuals to view their data being held by Momentum Instore should be addressed to GDPR@momentuminstore.com. The Company will firstly ask you to complete a Subject Data Access Request form for the purposes of properly verifying the identity of the individual making the request, ensuring it is lawful for us to provide the individual with the requested information and to understand specifically what data is being requested. The Company will then supply the electronic information requested within 1 month from the date of request for standard information requests. More complex information requests may take up to 3 months.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Managers in writing at GDPR@momentuminstore.com

The Company recognises an individual's "Right to be Forgotten", and such requests should be sent to GDPR@momentuminstore.com.

RIGHT TO COMPLAIN

If you believe that the organisation has not complied with your data protection rights, you can complain to the Information Commissioner.

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal information (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 another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information 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 the Data Protection Managers at GDPR@momentuminstore.com. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

WORKERS DUTIES

To help the Company keep accurate information, you must tell us about changes to contact, payroll or other personal details. You also have a role to play in helping the Company meet its obligations to handle personal data relating to other workers in accordance with GDPR.

If you receive a request for disclosure of information about another worker, you must be careful. You should take all reasonable steps to establish the identity of the person seeking the information, obtain a written request or phone number and then pass the request to a member of the HR Department.

If you need to handle personal information relating to another worker as part of your job, you should do so only as reasonably necessary for your job and take all reasonable steps to protect the security of that information.

Workers in doubt about handling personal information relating to other workers should seek guidance. Accessing, keeping, disclosing or otherwise using records of other workers without

authority can be a serious offence (and in some cases may constitute a criminal offence) which may result in the Company terminating your temporary contract.

RESPONSE TO DATA BREACH

Responsibilities

All users (including but not limited to): Employees, Workers, Contractors, Owners Momentum Instore and any third party users have an obligation to be aware of, follow and comply with this procedure in the event of a personal data breach caused by themselves or another.

Once a breach has been reported by an Employee, Worker, Contractor, Owner of Momentum Instore or any third party, the organisation must comply with the procedures outlined below.

The Data Privacy Managers are responsible for ensuring this procedure is reviewed and updated in line with GDPR requirements

Personal Data Breach

A personal data breach means a breach of security leading to the destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. For example:

- access by an unauthorised third party
- sending data to an incorrect recipient
- losing computer devices which contain personal data
- alteration of personal data without permission

Procedure – Reporting a Breach Internally

Any user who negligently, intentionally, accidentally or otherwise causes a breach, should report this breach to The Data Privacy Managers or to their manager should the Data Privacy Managers be out of the office, by way of email detailing when the breach occurred, who the breach was made by, the full details of the breach, who the data subject is that the breach concerns and any other relevant information.

Any user who becomes aware of a breach whether by themselves, another individual or system etc. should report the breach in the same way

No attempt should be made to mitigate the breach by any person unless advice has first been sought from the Data Privacy Managers or unless they have undertaken the relevant training which has authorised them to do so in the absence of this advice

As soon as any person becomes aware of a breach, this must be reported as soon as possible but as a minimum, within 24 hours of becoming aware of the breach occurring

A failure to report a breach in compliance with this procedure could result in the organisation disposing of the services of any Worker, Contractor or other third party with or without notice

CHANGES TO THIS PRIVACY NOTICE

Changes to the privacy notice will be communicated with reasons for such changes (for example changes in law or changes in approach/uses).

CONTACT US

Please direct any queries to our Data Privacy Managers on GDPR@momentuminstore.com.