ENVEA UK LTD gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

ENVEA UK LTD’s registered office is at Envea House, Rose & Crown Road, Swavesey, Cambridgeshire CB24 4RB and we are a company registered in England and Wales under company number 02514486. We act as the data controller. Our designated Appointed Person for the organisation is Lynsey Newbery, who can be contacted at the registered office, and by email l.newbery@envea.global.

Information That We Collect

ENVEA UK LTD processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

The personal data that we may collect is:

- Customer contact details that may include personal data about the contact.
- Utilising our Customer Support functionality, giving your contact details so we can support you as a customer.
- Providing Customer and Technical support for our systems.
- Information required for legal payroll processing, this includes addresses, NI numbers, tax codes etc.
- Your personal contact details, personal telephone and email details.
- Your skills and qualifications.
- Your photograph for company identification purposes and use in our marketing material.
- Emergency Contact details for you and for your nominated emergency contacts.
- Personal Correspondence with us by phone, email, letters or otherwise.
- Information required for traveling on company business such as Driving licence, Passport numbers, details on Visas etc.
- Special Category Data such as Health surveillance, occupation health reports etc, criminal convictions, driving convictions.

We collect information in these ways:

- Telephone interview, website contact detail, Paper forms, via ADP website orders, employment CV’s, email requests.

How We Use Your Personal Data (Legal Basis for Processing)

ENVEA UK LTD takes your privacy very seriously and will never disclose, share or sell your data without your consent; unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice. We only market directly to other business concerns, we never market to an individual. Where we are providing our customers with promotional offers and marketing, the customer contact is free to withdraw this consent at any time. The purposes and reasons for processing your personal data are detailed below:

<table>
<thead>
<tr>
<th>Purpose for which we will process the data</th>
<th>Legal Basis for the processing</th>
</tr>
</thead>
</table>

Cognidox Doc No PC-001815-PY
Author; Lynsey Newbery
Date 30/05/18
information

<table>
<thead>
<tr>
<th>Purpose for which we will process the information</th>
<th>It is necessary to advise our Business customers of legitimate changes to our products, systems and processes. We only establish trading relationships with businesses not individuals.</th>
</tr>
</thead>
<tbody>
<tr>
<td>To provide our customers information on New product information and changes that we are making to our systems and software</td>
<td>It will be necessary for our legitimate business interest to ensure that they are aware of the latest developments and processes in relation to the services that we are contracted to provide to them as a customer</td>
</tr>
<tr>
<td>To notify our customers about any changes we are making to the services that we are providing to them.</td>
<td>It is necessary for our legitimate business interest to process the payroll in a lawful manner with employee’s information. We are also legally obliged to provide payroll information to Government Agencies.</td>
</tr>
<tr>
<td>To administer payroll within our business</td>
<td>It is necessary for our legitimate business interest to process the HR information with proper business processes to ensure that both Staff and the company understand what is required of them for best HR practices.</td>
</tr>
<tr>
<td>To Administer the HR function within our business</td>
<td>It is necessary to arrange business travel for those who have roles that are obliged to travel. We will only do this if you give us your consent by some specific, informed and unambiguous method.</td>
</tr>
<tr>
<td>To provide personal information to our travel agent to enable you to travel in the UK and abroad on business</td>
<td></td>
</tr>
</tbody>
</table>

Your Rights

You have the right to access any personal information that ENVEA UK LTD processes about you and to request information about:

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to correct it as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing (where applicable) in accordance with the data protection laws; as well as to object to any direct marketing from us; to exercise your data portability rights, and to be informed about any automated decision-making we may use.

Currently ENVEA UK LTD. does not perform any automated decision making.
If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

**Sharing and Disclosing Your Personal Information**

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement for us to provide the below services and business functions; however, all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures.

<table>
<thead>
<tr>
<th>Third Party Company</th>
<th>Reason For using third party together with the data we use</th>
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</thead>
<tbody>
<tr>
<td>ADP Corporation</td>
<td>To legally process payroll and manage HR data. ADP provide a portal which we control and operate. We enter your payroll information and all HR management information that we deem necessary to manage the business effectively. For information on ADP’s policy please read their privacy statement found here: <a href="https://www.adp.co.uk/privacy-statement-for-clients-and-client-employees#">https://www.adp.co.uk/privacy-statement-for-clients-and-client-employees#</a></td>
</tr>
<tr>
<td>SAP CONCUR</td>
<td>To process business expenses on an online portal. We ask you to populate your name, your address, your personal car details, your personal contact details, to enable processing of expenses in an efficient way. For information on Concur’s policy please read their privacy statement found here <a href="https://www.concur.com/en-us/processor-privacy-statement">https://www.concur.com/en-us/processor-privacy-statement</a></td>
</tr>
<tr>
<td>CTM</td>
<td>To manage and maintain our IT infrastructure and network. CTM have access to all data that the company produces except payroll, HR, banking and Expense. For information on CTM policy please read their privacy notice <a href="https://www.ctm-it.com/policies/privacy-policy">https://www.ctm-it.com/policies/privacy-policy</a></td>
</tr>
<tr>
<td>Lovewell- Blake</td>
<td>To lawfully perform our financial year end audit to finalise our annual account and tax returns. We provide them with the minimum amount of personal data that they require to perform the audit legally. This includes payroll information. Information on Lovewell-Blake’s policy can be found here: <a href="https://www.lovewell-blake.co.uk/privacy-policy">https://www.lovewell-blake.co.uk/privacy-policy</a></td>
</tr>
<tr>
<td>Scottish Widows</td>
<td>To manage and process your pension contributions to the Company’s pension scheme. Information on Scottish widow’s privacy policy can be found here <a href="http://www.scottishwidows.co.uk/extranet/legals/privacy">http://www.scottishwidows.co.uk/extranet/legals/privacy</a></td>
</tr>
<tr>
<td>Barclaycard</td>
<td>To manage bona fide company purchases for employees whilst on company business, small items or where we do not have credit facilities. We provide Barclaycard with your name, private address and telephone number, this is information that is required to provide the card. Information on Barclaycard’s privacy policy can be found here <a href="https://www.barclaycard.co.uk/personal/privacy-policy">https://www.barclaycard.co.uk/personal/privacy-policy</a></td>
</tr>
<tr>
<td>Lloyds Bank</td>
<td>To manage pay and expense payments to staff we provide the bank with your name and bank details. Information on Lloyds Bank Privacy policy can be found here <a href="https://www.lloydsbank.com/privacy.asp">https://www.lloydsbank.com/privacy.asp</a></td>
</tr>
</tbody>
</table>

**Safeguarding Measures**
ENVEA UK LTD takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, including: - Passwords encryptions, restricted access, IT authentication, firewalls, anti-virus/malware

**Transfers Outside the EU**

Personal data in the European Union is protected by the General Data Protection Regulation (GDPR) but some other countries may not necessarily have the same high standard of protection for your personal data. ENVEA UK LTD does not transfer or store any personal data outside the EU.

**Consequences of Not Providing Your Data**

You are not obligated to provide your personal information to ENVEA UK LTD, however, as this information is required for us to provide you with our services and or deliver your products and your legitimate interests, we will not be able to offer some/all our services without it. For employees or prospective employees, this may mean that we are not able to offer employment.

**Legitimate Interests**

As noted in the ‘How We Use Your Personal Data’ section of this notice, we occasionally process your personal information under the legitimate interests’ legal basis. Where this is the case, we have carried out a thorough Legitimate Interests’ Assessment (LIA) to ensure that we have weighed your interests and any risk posed to you against our own interests, ensuring that they are proportionate and appropriate.

**How Long We Keep Your Data**

ENVEA UK LTD only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. We are required under UK tax law to keep your basic personal data (*name, address, contact details*) for a minimum of 6 years after which time it will be destroyed unless it is payroll related in which case it must be held for a minimum of 7 years.

Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

**Special Categories Data**

For employment situations, ENVEA UK LTD sometimes needs to process sensitive personal information (*known as special category data*) about you, to monitor health and safety. Where we collect such information, we will only request and process the minimum necessary for the specified purpose and identify a compliant legal basis for doing so.

Where we rely on your consent for processing special category data, we will obtain your explicit consent through a signature. You can modify or withdraw consent at any time, which we will act on immediately, unless there is a legitimate or legal reason for not doing so.

We rely on GDPR Article 9(2) to process Special Category data.

**Lodging A Complaint**
ENVEA UK LTD only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

ENVEA UK LTD
Lynsey Newbery
Envea House
Rose & Crown Road
Swavesesy
Cambridge
CB24 4RB
L.newbery@envea.global

Consent

ENVEA UK LTD take your privacy seriously and will only process your personal data with your consent and in accordance with the terms stated in our Privacy Policy. If you consent to us collecting and processing your personal data, please sign below:

Signature: ___________________________  Print Name: ___________________________
Time: ___________  Date: ___________

I confirm that I have been provided with a copy of ENVEA UK LTD Privacy Notice