

GDPR Information Privacy Notice

Net Consulting Ltd
4C Greenmeadow Springs Business Park
Village Way
Cardiff
CF15 7NE
United Kingdom

Contents

Introduction.....	3
Scope.....	3
Fair and Lawful processing	3
Information Controller	5
Rights to Access Information.....	5
Control of Information	5
Appendix 1 – Processing of Personal Information and Sensitive Personal Information.....	7

Introduction

Net Consulting holds personal information about our employees, contractors, clients and potential clients, suppliers and other individuals for the purposes of satisfying operational and legal obligations. We recognise the importance of the correct and lawful processing and control of that information. Accordingly, this privacy notice sets out our commitment to protect personal information and ensure that our employees understand their obligations in relation to the use of personal information to which they have access. This privacy notice also requires our employees and contractors to ensure that our Data Protection Manager is consulted before any significant new information processing activity is initiated to demonstrate that relevant compliance requirements are implemented.

All personal information, whether held on paper, electronically or other media, will be subject to the appropriate legal safeguards as specified in the EU Data Protection Regulation 2016 (GDPR).

Scope

This privacy notice applies to all Net Consulting employees, including contractors and any suppliers or partners who have access to Net Consulting information. This privacy notice complements our other policies relating to website, internet and email use. We may supplement or amend this privacy notice by additional policies, notices and guidelines from time to time. Any new or revised privacy notices will be made available to employees before being adopted.

Fair and Lawful processing

Net Consulting commits to processing personal information fairly and lawfully in accordance with the rights of data subjects. This means that we only process personal information in relation to the specific purpose(s) it was provided to or collected by us, which may include agreed contractual obligations or identified legitimate interest.

Accordingly, the processing of all personal information must be:

- Necessary to deliver our services; and
- In our legitimate interests and will not unduly prejudice the privacy of the data subject. In most cases, this provision will apply to routine business information processing activities.

Our standard terms and conditions of business contains an appropriate privacy notice, which describes our commitment to processing personal information fairly and lawfully and confirms:

- The purposes for which we hold personal information
- That any engagement or contract may require us to provide personal information to third parties who are legitimately involved in the provision of the related products and services
- That employees, contractors, clients and other individuals have a right of access to the personal information that we hold about them.

Sensitive Personal Information

In most cases, where Net Consulting processes sensitive personal information, we will require the data subject's explicit consent, unless exceptional circumstances apply or we are required to do this by law. Any such consent will need to clearly identify what the relevant information is, why it is being processed and to whom it may be disclosed.

Accuracy and Relevance

Net Consulting will ensure that any personal information we process is accurate, adequate and relevant to the purpose for which it was obtained.

We commit not to process personal information obtained for a legitimate purpose for any unconnected purpose unless the data subject concerned has agreed to this or would otherwise reasonably expect us to do this.

Data subjects may request that we correct inaccurate personal information relating to them. If you believe that your personal information is inaccurate, you should contact Paul Thomas, the Net Consulting Data Protection Manager and provide details of the inaccuracies.

Your Personal Information

Data subjects must take reasonable steps to ensure that any personal information we hold is accurate and updated as required. For example, if your personal circumstances change, please inform the Data Protection Manager so that your personal information can be updated.

Information Security

Net Consulting commits to keeping all personal information secure against loss, breach or misuse. Where we engage with third-parties to process personal information as a service on our behalf, Net Consulting will determine what additional information security measures are required in contracts with the third-party organisations.

Storing Information Securely

Net Consulting commits to managing all personal information appropriately, including:

- Where information is stored on paper, it should be kept securely, so that unauthorised individuals cannot access it
- Printed information should be shredded when it is no longer required
- Information stored on end-point computer devices should be protected by strong passwords that are changed regularly, in accordance with our password management policy
- All servers containing personal information must be sited in a secure location, so that unauthorised individuals cannot access them
- Information will be regularly backed up in accordance with our backup procedures
- All servers containing sensitive personal information will be protected by appropriate security measures, including technical and firewall controls.

Information Retention

Net Consulting will retain personal information for no longer than is necessary and justified. The retention of personal information will be managed in accordance with our information retention guidelines.

Information Controller

The Data Protection Manager is responsible for ensuring compliance with the EU General Data Protection Regulation 2016 (GDPR) and the implementation of this privacy notice on behalf of Net Consulting. Paul Thomas is the Data Protection Manager at Net Consulting. Any questions or concerns about the interpretation or operation of this privacy notice should be addressed in the first instance to Glenn Morgan.

Any staff member, who considers that the privacy notice has not been followed in respect of the control of personal information in any respect should raise the matter with Glenn Morgan in the first instance.

Rights to Access Information

All data subjects whose personal information is retained by Net Consulting are entitled to:

- Confirm what information is held about them and why
- Ask how to gain access to this information
- Be informed as to how to keep this information up to date
- Be informed as to what Net Consulting is doing to comply with its obligations under GDPR.

This is known as a 'subject access request'. This right applies to all Net Consulting employees and contractors as well as other subjects of personal information held by Net Consulting.

This right is subject to certain exemptions which are set out in the EU General Data Protection Regulation 2016 (GDPR). Any person who wishes to exercise this right should make the request as follows:

- Paul Thomas – Managing Director and Data Protection Manager
- DataProtectionManager@netconsulting.co.uk or 02920 972020
- Net Consulting, 4C Greenmeadow Springs Business Park, Village Way, Cardiff, CF15 7NE.

Net Consulting aims to comply with requests in relation to personal information as quickly as possible and will ensure that it is provided within 30 days of receipt of a valid request and associated pre-requisites prescribed in the EU General Data Protection Regulation 2016 (GDPR), unless there is a justifiable reason for delay. In such cases, the reason for delay will be explained in writing to the person making the request.

Control of Information

The storage, transmission and use of personal information and sensitive personal information outside of the control of Net Consulting is prohibited unless specifically authorised in accordance with the GDPR Privacy Notice.

Net Consulting commits to comply with the requirements of the EU General Data Protection Regulation 2016 (GDPR) and to manage and control the use of mobile devices and portable storage media to ensure that personal information and sensitive personal information is protected from unauthorised access, dissemination, alteration or deletion.

These controls apply to all Net Consulting employees and contractors who may be required to store, transmit and use personal information or sensitive personal information outside of Net Consulting's direct control, including using mobile devices (laptops and mobile phones), portable storage media (memory sticks and CDs) or other forms of communication (email and extranet).

The definition of "personal information" can be complex, but for day-to-day purposes it is advisable to treat all information about living, identifiable individuals as "personal information", which can be retained in a variety of formats, including but not limited to email, word processed documents, spreadsheets and databases.

Appendix 1 – Processing of Personal Information and Sensitive Personal Information

Employees and Contractors

Types of personal information	Why we collect it
General	
<p>Your contact details including your name, postal, phone & email addresses; and other personal details about you including your title, job title, marital status and date of birth.</p>	<ul style="list-style-type: none"> Your name and address are required to enable us to prepare your contract of employment. All personal data listed is required for payroll purposes. All personal data listed (with the exception of your bank details) is required to enrol you into Net Consulting's pension scheme. Your name, sex, date of birth, date of joining, occupation and annual salary are used for the purpose of providing life cover under the Net Consulting's death in service policy.
<p>Identity details including your name and date of birth.</p> <p>We may ask for copies of identity documents in which case we may collect details including your place of birth and residential address.</p>	<ul style="list-style-type: none"> To carry out identification and eligibility checks and for any related security vetting purposes We will only ever use copies of identity documents for this purpose. We collect and process this personal information in order to comply with our legal and regulatory requirements.
<p>Contact telephone numbers</p>	<ul style="list-style-type: none"> This enables us to contact you in the event of an emergency or to check your health and wellbeing in the event that you do not turn up for work as expected.
<p>Contact details</p> <p>Next of kin</p>	<ul style="list-style-type: none"> This information is held to enable us to contact next of kin or a family member in the event of an emergency at work or if you do not turn up for work as expected and we cannot contact you by any other means.
<p>Sickness Absence Records</p>	<ul style="list-style-type: none"> Recording sickness absence helps with the management of employees who are absent due to sickness and ensures an accurate payment of both contractual and statutory sick pay. It is important to know why an employee is sick, in case the cause could be work-related, or if reasonable adjustments are needed to help the employee return to work, as well as organise appropriate cover for the absence, if appropriate. Analysing sickness absence records can uncover any notable patterns or reasons for absence that could be caused by or exacerbated by work. Early intervention can increase the chances of a quicker return to work and minimise disruption caused by absences. Monitoring of sickness absence records will facilitate an early identification of any potential problems.

Pre-Employment	
Pre- Employment Medical Questionnaire	<ul style="list-style-type: none"> The information contained in this form is collected as part of Net Consulting’s recruitment procedures to ensure that you are able to safely carry out the role for which you have applied and to ensure that no adjustments need to be made by us in order for you to do that.
Application Form for Employment	<ul style="list-style-type: none"> The information contained in this form is collected as part of the Net Consulting’s recruitment procedures to ensure that you are suitable for the role you have applied for.
Reference Requests	<ul style="list-style-type: none"> References are taken up as part of the Net Consulting’s recruitment procedures to ensure that you are suitable for the role you have applied for.
Post-Employment	
Reference Requests (post-employment)	<ul style="list-style-type: none"> Post-employment reference requests ask for a variety of information.
Retention of information	<ul style="list-style-type: none"> Information is retained in line with Net Consulting’s data retention policy.
All of the personal information described above.	<ul style="list-style-type: none"> We may disclose your personal information to third parties where we are required to do so to comply with applicable laws and regulatory requirements including in circumstances where we are required to do so by a court Order, regulatory authority or any other third party with the lawful right to request and receive the personal information we hold about you (including law enforcement agencies and tax authorities). We may also use your personal information where it is necessary for us to take legal advice in order to establish our legal rights, to bring a claim against you or any related parties or to defend a claim from you or any related parties. We collect and process this personal information for our legitimate business interests including to carry out our own internal business planning, compliance, training, audit and quality assurance purposes.

Types of sensitive personal information	Why we collect it
Information about your physical or mental health or condition.	<ul style="list-style-type: none"> As part of Net Consulting’s recruitment processes, we will need to collect information relating to your physical and mental health in order to ensure that you are able to safely carry out the role for which you have applied. We will usually collect this information in the course of the recruitment process, including on specific questionnaires or in the process of completing an application form for employment.
Information about your racial or ethnic origin.	<ul style="list-style-type: none"> As part of Net Consulting’s recruitment processes, we may need to collect and retain information relating to your racial or ethnic origin.

Clients and Other Individuals

Types of personal information	Why we collect it
<p>Your contact details including your name, postal, phone & email addresses; and other personal details about you including your title, job title, marital status and date of birth.</p>	<ul style="list-style-type: none"> • To contact you in order for us to manage, administer and provide our services to you. • To respond to any correspondence and service-related enquiries you send to us in respect of our services. • To discuss products or services for which you apply or may be interested in requesting. • To manage any orders you make for products or services. • To communicate any updates to you including any changes to our products and services, the terms and conditions of any products and services which we have provided to you, any changes to this privacy notice and to our website. • To contact you in order to receive your feedback on our products and services and to participate in related surveys.
<p>Details of contact that we have had with you such as meetings with you, fact-finding discussions and documentation, recommendations, referrals and quotes.</p>	<ul style="list-style-type: none"> • To allow us to provide a professional service to you and to contact you with information about other services of ours that we think you may be interested in. • We collect and process this personal information for our legitimate business interests.
<p>Details of services you have received.</p>	
<p>Client experience and other feedback and information you provide to us.</p>	<ul style="list-style-type: none"> • To review your feedback and experience with us so that we can improve our products and services for you and for our other clients. • We collect and process this personal information for our legitimate business interests.
<p>Information about complaints and incidents.</p>	

<p>All of the personal information described above.</p>	<ul style="list-style-type: none">• We may disclose your personal information to third parties where we are required to do so to comply with applicable laws and regulatory requirements including in circumstances where we are required to do so by a court order, regulatory authority or any other third party with the lawful right to request and receive the personal information we hold about you, including law enforcement agencies and tax authorities.• We may also use your personal information where it is necessary for us to take legal advice in order to establish our legal rights, to bring a claim against you or any related parties or to defend a claim from you or any related parties.• We collect and process this personal information for our legitimate business interests including to carry out our own internal business planning, compliance, training, audit and quality assurance purposes.
--	---