

Fair Processing Notice

The Mace group is committed to protecting and respecting your privacy.

This fair processing notice sets out the basis on which any Personal Data we collect in our prequalification checks and throughout our relationship with our contractors, sub-contractors and their employees will be processed by us. Some of the data we collect is in the Special Categories of Personal Data. Please read this fair processing notice carefully to understand our views and practices and your rights regarding your Personal Data. Prior to providing the Mace group with your own Personal Data or Personal Data relating to third party data subjects, this fair processing notice will be made available to you.

The Mace group is made up of different legal entities. When we refer to 'Mace', 'we', 'us', or 'our', we are referring to the relevant company in the Mace group responsible for processing your data.

The Mace group company with which you, or where you are the employee of a sub-contractor or sub-consultancy, your employer, deals with directly, will be the data controller in respect of the processing of personal data referred to in this fair processing notice.

With regard to our contractors and sub-contractors within the UK, the relevant data controller will generally be Mace Limited of 155 Moorgate, London EX2M 6XB. In some circumstances, other Mace group companies will also be a controller in respect of your personal data. If you have any queries about which Mace group company is a controller in respect of your personal data, please contact the Data Protection Compliance Manager ("DPCM") at gdpr@macegroup.com.

This fair processing notice is overseen by the DPCM. If you have any queries, complaints or requests relating to any entities within the Mace Group, please contact the DPCM at gdpr@macegroup.com or 020 3522 3081.

This notice was last changed on 11 June 2020.

- What information do we collect from you?
- Why do we collect this information?
- How long do we keep hold of your information?
- Automated decision making
- Who might we share your information with?
- How is your data stored and kept secure?
- What are your rights?
- Definitions
- Changes to this Policy
- Contact Us

Covid-19

In order to protect the safety of our workforce, we may be required to collect your personal data for purposes related to our Covid-19 response. That may include information about your health including whether or not you have or have had Covid-19, whether or not you are displaying Covid-19 symptoms, your medical status (e.g. your "shield" status as set out by the government) and results from Covid-19 tests, including tests that we may be required to conduct at our offices and on our sites. We may also be required to collect personal data relating to individuals within your household or individuals that you have been in contact with who have Covid-19 or are displaying Covid-19 symptoms, in particular where that requires you to self-isolate at home. This information will allow us to make decisions about whether individuals can continue to work at our offices and on our sites and about any steps we need to put in place to protect the safety of our workforce. We will collect this information where we are legally allowed to do so and in accordance with this privacy policy.

We are implementing social distancing measures on our sites to protect our workers. These include various procedures and technologies, including an app that will need to be downloaded to your mobile phone. If you are working on one of the sites where an app is being used, then you will be notified of this. We have set out further information below about how your personal data will be processed in respect of social distancing measures.

What information do we collect from you?

We will collect and process the following data about you and your directors and employees, and also your subcontractors and their employees:

- Information you, your subcontractors, and you and your subcontractors' employees and directors give us. This is information about you that you give us by filling in forms on our site or by corresponding with us by phone, email or otherwise. The information you give us may include:
 - through prequalification checks: CVs, including names, age, telephone number, mobile telephone number, address, email address, qualifications, training certificates and experience of your leadership, management and supervision, and Personal Data in relation to H&S information, including information about accidents and incidents that you and your subcontractors' employees and directors have suffered at work; main contact/s for your company: name, telephone number and email address;
- Personal Data provided when completing your security pass application form including: employer, name, job title, start date on site, date of birth, home address, nationality, national insurance number, emergency contacts, telephone number, length of time spent working in construction, details of skills card held, declaration of your right to work and on some occasions a photograph or fingerprint scan to allow you onto site. (Note: this section will be updated following DPIA if necessary);
- Personal Data collected throughout the relationship: CCTV, drone, body worn camera, webcam or other types of camera footage whilst on site, sickness and absence records collected throughout your time on site, results of drug and alcohol tests and any other Personal Data. (Note: this section will be updated following DPIA if necessary);
- Personal Data to assist with social distancing on our sites. On some of our sites, you may be required to download a location tracking that to your mobile phone. That app tracks your location for the purposes of monitoring and assisting with social distancing on site. We collect and process a username, password, device IMEI number and location data. We only review information about your location on site. However, the app tracks your location continually in the background unless you turn it off (including when you are off-site). You must therefore turn off the tracking when you leave the site.
- Personal data relating to managing and monitoring the performance of individuals working for our suppliers, sub-contractors, sub-consultants and contractors, e.g. working hours (including by use of electronic entry systems or paper time sheets and collection via fingerprint scanning) and work done whilst on site, including to monitor productivity
- Personal Data collected through credit checks: information about the financial and legal history of your directors and executive officers;
- Personal Data collected through security clearance checks including photocopies of passports;

- Personal Data collected through being a member of or from attendance at courses run by Mace Business School, or applying to attend such courses: such as contact details, employment information, a photograph, and any dietary requirements or special needs and which may include Special Categories of Data;
 - Information about your health, including any medical condition and your medical history, health and sickness records, and accident records.
 - Equality and Diversity – you may choose to share information about your ethnicity, sexuality or beliefs with us for inclusion purposes. This information will be treated as highly confidential.
 - Trade Union membership – information in respect of your membership of any trade unions.
 - Information we receive from other sources. We will use your directors' Personal Data set out above to run credit checks on those directors.
 - Other data which we may notify you of from time to time.
- Information we receive from other sources. We will use credit checks on you and your directors to assess whether you meet Mace's criteria for its suppliers.
- We may also process data on the basis of your consent or explicit consent.

How long do we keep hold of your information?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

Why do we collect this information?

We use this information in the following ways:

Information you, your subcontractors, and you and your subcontractors' employees and directors give to us and which we collect through our relationship. We process your Personal Data for the following reasons:

- Pursuant to a contract in order to:
 - process information at your request to take steps to enter into a contract;
 - process payments;
 - make deliveries;
 - allow you to fulfil your obligations under the contract, including access to sites,
 - maintain business and service continuity;
 - send service communication so that you receive a full and functional service and so we can perform our obligations to you. These may be sent by email or post or, if the circumstances require it, we may contact you by phone. These will include notifications about changes to our service.
- To comply with legal requirements relating to:
 - data protection;
 - health and safety;
 - anti-money laundering;
 - fraud investigations;
 - assisting law enforcement;
 - requirements from the Home Office; and
 - any other legal obligations place on us from time to time.
- In our legitimate interest of ensuring safety on site, security for the site and to enable us to effectively manage and monitor the site. For example, use of CCTV to monitor the site.
- In our legitimate interest of ensuring and protecting the health and safety of our workforce
- In our legitimate interest of ensuring appropriate social distancing on our sites.
- In our legitimate interest for the purposes of confirming the accuracy of submitted time sheets relating to those who work on our sites and to monitor productivity on our sites more generally
- In our legitimate interest of improving Mace as a business.

Automated decision making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

1. Where we have notified you of the decision and given you 21 days to request a reconsideration.
2. Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.
3. 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.

Who might we share your information with?

You agree that for the purposes set out in the 'Why do we collect this information?' section above, we have the right to share your personal information with:

- Our employees. For example our employees can access contact details for employees of our sub-contractors through Mace's intranet;
- Our clients and prospective clients. For example in respect of bids;
- Our sub-processors and service providers as notified to you from time to time, occupational health providers, IT service providers, CCTV provider, site security provider, auditors and our drug and alcohol testing provider in accordance with our drug and alcohol testing policy. Details of which can be provided upon request;
- Our business partners, subsidiaries, affiliates, customers, suppliers and sub-contractors for the performance of any contract we enter into with you;
- Information relating to health and safety incidents may be shared with third parties, including the Health and Safety executive;
- other companies in the Mace Group.

Additionally, we will disclose your personal information to the relevant third party:

- If you use our electronic entry systems, or fill in paper time sheets relating to your work on one of our sites or offices, we may share your electronic entry records with your employer or another third party (for example, one of our clients).
- In the event that we sell or buy any business or assets, in which case we will disclose your Personal Data to the prospective seller or buyer of such business or assets.
- If we are acquired by a third party, in which case Personal Data held by it about its customers will be one of the transferred assets.
 - To third parties when it is necessary for the establishment, exercise or defence of legal claims.
 - If we choose to exercise a legal power to do so.
- If we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of our customers, our regulator, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and prevention of money laundering and credit risk reduction.

How is your data stored and kept secure?

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from the DPCM.

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

We may transfer your data outside the European Economic Area ("EEA"). We will only do so if adequate protection measures are in place in compliance with data protection legislation. We use the following protection measures:

- transferring to Commission approved countries;
- using Commission approved model contractual clauses;
- requiring companies to which we transfer data to be signed up to appropriate certification; or
- transferring when one or more of the conditions set out in Article 49 GDPR are met.

What are your rights?

Where processing of your Personal Data is based on consent, you can withdraw that consent at any time.

You have the following rights. You can exercise these rights at any time by contacting the DPCM. You can make a subject access request verbally or in writing. In order to deal with your request effectively, it would be helpful if you could contact the DPCM in the first instance. The DPCM may be contacted in the following ways:

By post:

DPCM (Legal Department), Mace Ltd.,
155 Moorgate, London EC2M 6XB

By email:

gdpr@macegroup.com

By telephone:

+44 (0)20 3522 3081

You have the right:

- to ask us not to process your Personal Data for marketing purposes. We will inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes;
- to ask us not to process your Personal Data where it is processed on the basis of legitimate interests provided that there are no compelling reasons for that processing;
- to ask us not to process your Personal Data for scientific or historical research purposes, where relevant – unless the processing is necessary in the public interest.
- to request from us access to personal information held about you;
- to ask for the information we hold about you to be rectified if it is inaccurate or incomplete;
- to ask for data to be erased provided that the Personal Data is no longer necessary for the purposes for which it was collected, you withdraw consent (if the legal basis for processing is consent), you exercise your right to object, set out below, and there are no overriding legitimate grounds for processing, the data is unlawfully processed, the data needs to be erased to comply with a legal obligation;
- to ask for the processing of that information to be restricted if the accuracy of that data is contested, the processing is unlawful, the Personal Data is no longer necessary for the purposes for which it was collected or you exercise your right to object (pending verification of whether there are legitimate grounds for processing);
- to ask for data portability if the processing is carried out by automated means and the legal basis for processing is consent or a contract.
- Should you have any issues, concerns or problems in relation to your data, or wish to notify us of data which is inaccurate, please let us know by contacting us using the contact details above. In the event that you are not satisfied with our processing of your Personal Data, you have the right to lodge a complaint with the relevant supervisory authority, which is the Information Commissioner's Office (ICO) in the UK, at any time. The ICO's contact details are available here: <https://ico.org.uk/concerns/>.

Definitions

Personal Data: Any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier, such identifiers including name, identification number, location data or online identifier.

Special Categories of Data includes data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

Changes to our fair processing notice

This fair processing notice may be updated from time to time. Please check back frequently to see any updates or changes to our fair processing notice.

Contact us

Questions, comments and requests regarding this fair processing notice are welcomed and should be addressed to:

DPCM (Legal Department), Mace Ltd.,
155 Moorgate, London EC2M 6XB

or email gdpr@macegroup.com

or you can call us on +44 (0)20 3522 3081