



April 2021

# Supplier privacy notice

We, Itad Ltd a UK registered company (company number: 01869600) whose registered address is Preece House, Davigdor Road, Hove, BN3 1RE (Itad/we/our/us) takes your individual privacy seriously. This Privacy Notice describes what information we are collecting from you, how it will be used and our legal reasons for processing the personal data. If you are not happy with any of the information provided in this Privacy Notice or have any questions at all please contact us directly on +44 (0)1273 765250 or by email [mail@itad.com](mailto:mail@itad.com)

This Privacy Notice supplements other notices we may provide to you from time to time and is not intended to override them.

## 1. Data subjects

This Privacy Notice sets out how we, acting as data controller will collect and process the personal data of:

- Potential individual contractors;
- Registered individual contractors;
- Personnel of our potential subcontractor companies; or
- Personnel of our registered subcontractor companies.

## 2. The data we collect about you

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** including your first name, maiden name, last name, marital status, title, photo, passport details, date of birth and gender.
- **Contact Data** including your address, email address and telephone numbers.
- **Qualification Data including details of achievements, qualifications and courses attended.**
- **Financial Data** including your bank account and invoicing details.
- **Special Category Data** including details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, information about your health, genetic data, personally identifiable traits, and information about criminal convictions and offences.

### 3. How is your personal data collected?

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

- **Direct interactions.** You may give us your Identity, Contact, Financial Data, Qualification Data and Special Category Data by filling in forms or by corresponding with us by post, phone, email or otherwise.
- **Your Employer.** Where you are personnel of one of our subcontractors, your employer may provide us with your Identity, Contact, Financial Data, Qualification Data and Special Category Data.
- **Our Client.** Where you are providing services on our behalf to one of our clients, we may receive personal data about you from our client.
- **Other third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources, such as where we are required to validate your suitability for the provision of services or to comply with our statutory obligations and general duty of care.

### 4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

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. Please contact us if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Retention
Retention of CVs for appointed contractors	Identity Qualification Contact	Our legitimate interests to validate your identity and assess your suitability and for claim/insurance purposes	7 years from when you cease to be a registered contractor
Where you are a contractor, to set you as a registered contractor and update your annual registration	Identity data Contact data Qualification data Financial data	Performance of a contract with you	7 years from when you cease to be a registered contractor

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Retention
To verify your identity upon registration	Identity data (including a copy of your passport)	Performance of a contract  Compliance with a legal obligation	Delete/return once identity is verified or keep on file if to be required whilst a registered contractor
To verify your identity during the provision of services (proof of life form)	Special Category Data  Identity data	Consent  To safeguard vital interests of the data subject	Deleted once specific piece of travel is complete
To check your tax status (IR35 questionnaire)	Contact Data  Financial Data	Our legitimate interests to assess your status before appointment	7 years from when you cease to be a registered contractor
To administer the contract between you or your employer and us, including the ability to book flights, insurance or assist with visa applications on your behalf	Identity data (including a copy of your passport)  Qualifications  Contact	Performance of a contract where you are the contractor    Legitimate interests/consent where you are personnel	7 years from when you cease to be a registered contractor
Where you are a registered contractor or personnel, and providing services to or on behalf of us, including to monitor services	Identity  Contact  Financial  Qualifications	Performance of a contract    Legitimate interests/consent where you are personnel	7 years from when you cease to be a registered contractor or when your employer ceases to be a registered contractor
To enable Itad to respond effectively to an emergency or crisis  To enable Itad to notify your nominated emergency contact if you are involved in an incident whilst overseas  To provide any medical information to persons administering medical care	Identity  Contact  Special Category Data	To fulfil our legal Duty of Care requirements  To safeguard vital interests of the data subject   Consent	When you cease to be a registered contractor or your employer ceases to be a registered contractor (as applicable)

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Retention
To manage payments, fees and charges  To Collect and recover money owed to us (such as overpayments, where applicable)	Identity  Contact  Financial	Performance of a contract with you (to make the necessary payments)  Necessary for our legitimate interests (to recover debts due to us)	7 years from when you cease to be a registered contractor
To manage our relationship with you which will include notifying you about changes to our terms or privacy policy	Identity  Contact	Performance of a contract with you  Necessary to comply with a legal obligation	7 years from when you cease to be a registered contractor

## 5. Disclosures of your personal data

We may share your personal data as follows:

Third party	Type of Data/Purpose
A company within our group, Itad Inc, incorporated in the US (EIN: 84-2346030)	CVs and CRM (customer relationship management) data including contact and identity data, for potential engagements and of potential suppliers and contacts
Itad's insurers	Information including that provided in your registration form, in the event of a claim or potential claim
Our Clients	In relation to the delivery of services to our clients by you. These may be outside EEA (European Economic Area)
Our CRM provider	In relation to your identity and details of the services provided and our relationship with you
Service providers acting as processors who provide IT and system administration services	For administration and functionality purposes
HM Revenue & Customs, the FCDO (Foreign, Commonwealth & Development Office) regulators and other authorities acting as	To comply with legal and regulatory obligations

Third party	Type of Data/Purpose
processors or joint controllers based in the United Kingdom	
Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers	In relation to claims and advice and/or services provide to us
Third parties where we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime	To enable compliance with law
Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them	If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Notice

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 6. Storage and international transfers

The majority of the personal data we process is stored and backed up on servers within the UK. Some personal data we process is stored on the cloud through Microsoft, with their back up servers based in the UK or Ireland.

Where we share your personal data to Itad Inc, this will involve transferring your data outside the European Economic Area (**EEA**).

Where you are providing services to us or one of our clients (on our behalf) in the capacity of a contractor or personnel or one of our subcontractors and such services are provided outside of the UK your information may be transferred to the location where such services are being provided or where our client is located.

If we transfer your information outside of the EEA in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Privacy Notice.

These countries may not have similar data protection laws to the EEA. By submitting your personal data, you are agreeing to this transfer, storing or processing.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## 7. Data security

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

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

We are compliant with the IASME Governance assessment (including Cyber Essentials and GDPR elements) which is recertified annually.

## 8. Data retention

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.

Please note that our contractors may work on a number of separate engagements for us from time to time and we ask that our contractors re-register with us on an annual basis to ensure the data we hold is accurate and up to date. However, we appreciate the importance of ensuring that your personal data is only retained for as long as is necessary. Therefore we have taken the approach that where you provide services to us, and we are not required to retain your personal information for tax, legal or other requirements, we will only retain such information after the expiration of an engagement where you have confirmed you agree to renewing your registration. If you do not re-register we will then delete the personal data we hold.

Details of retention periods for different aspects of your personal data are set out in the table Purposes for which we will use your personal data above.

In some circumstances you can ask us to delete your data: see your legal rights below for further information.

## 9. Your legal rights

You have the following rights for any personal data we hold for you. For more information on these rights [visit the ICO website](#).

- The right of access;
- The right to rectification;
- The right to erasure;

- The right to restrict processing;
- The right to data portability;
- The right to object;
- Rights in relation to automated decision making and profiling.

To exercise any of these rights please email us at [mail@itad.com](mailto:mail@itad.com)

## 10. Children

We do not permit contractors or personnel of our subcontractors to be under the age of 18, and will therefore not knowingly collect personal data in accordance with this Privacy Notice of individuals under such age and will immediately (unless otherwise required by law) delete any such data subsequently so determined.

## 11. Complaints

You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## 12. Changes to the privacy policy and your duty to inform us of changes

We will keep this Privacy Notice under regular review. This version was last updated on 7<sup>th</sup> April 2021.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us. Please contact us either by email [suppliers@itad.com](mailto:suppliers@itad.com) or by telephone on +44 (0)1273 765250.