



Supplier Privacy Notice

We, Itad Ltd a UK registered company (company number: 01869600) whose registered address is International House, Queens Road, Brighton, East Sussex, BN1 3XE (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 Supplier Privacy Notice or have any questions at all please contact us directly on +44 (0)1273 765250 or by email mail@itad.com.

This Supplier 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 suppliers.
- Registered suppliers.
- Personnel of our potential supplier companies.
- Personnel of our registered supplier companies
- Data Subjects
- Data Subjects

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, e-mail 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, Qualification and Special Category Data by filling in forms or by corresponding with us by post, phone, e-mail or otherwise.
- **Your Employer.** Where you are personnel of one of our suppliers, your employer may provide us with your Identity, Contact, Financial, Qualification 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 services agreement 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/s 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 suppliers	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 Itad supplier.
Where you are a supplier, to set you up as a registered Itad supplier and update your registration	Identity Contact Qualification Financial	Performance of a services agreement with you	7 years from when you cease to be a registered Itad supplier.

Purpose / activity	Type of data	Lawful basis for processing including basis of legitimate interest	Retention
To verify your identity upon registration	Identity (including a copy of your passport)	Performance of a services agreement Compliance with a legal obligation	Delete/return once identity is verified or keep on file if required whilst a registered Itad supplier.
To verify your identity during the provision of services (proof of life form).	Identity Special Category	Consent. To safeguard vital interests of the data subject.	Deleted once specific piece of travel is completed.
To check your tax status (IR35 questionnaire).	Contact Financial	Our legitimate interests to assess your status before appointment.	7 years from when you cease to be a registered Itad supplier.
To administer the services agreement between you or your employer and us, including the ability to book flights, insurance or assist with visa applications on your behalf.	Contact Identity (including a copy of your passport) Qualification	Performance of a services agreement where you are the supplier. Legitimate interests / consent where you are personnel.	7 years from when you or your employer cease to be a registered Itad supplier.
Where you are a registered supplier or personnel, and providing services to, or on behalf of us, including to monitor services.	Contact Financial Identity Qualification	Performance of a services agreement Legitimate interests / consent where you are personnel	7 years from when you cease to be a registered Itad supplier or when your employer ceases to be a registered Itad supplier.
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	Contact Identity Special Category	To fulfil our legal Duty of Care requirements. To safeguard vital interests of the Data Subject. Consent.	When you cease to be a registered Itad supplier or your employer ceases to be a registered Itad supplier (as applicable).

Purpose / activity	Type of data	Lawful basis for processing including basis of legitimate interest	Retention
To provide any medical information to persons administering medical care.			
To manage payments, fees and charges To collect and recover money owed to us (such as overpayments, where applicable).	Contact Financial Identity	Performance of a services agreement 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 Itad supplier.
To manage our relationship with you which will include notifying you about changes to our terms or Privacy Policy	Contact Identity	Performance of a services with you. Necessary to comply with a legal obligation.	7 years from when you cease to be a registered Itad supplier.

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 data including contact and identity data, for potential engagements and of potential suppliers and contacts.
Itad's insurers	Information including that provided in your Itad 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 the UK or EEA.
Our CRM provider	In relation to your identity and details of the services provided and our relationship with you.

Third party	Type of data / purpose
Service providers acting as processors who provide IT and system administration services	For administration and functionality purposes.
His Majesty's Revenue & Customs, the UK Foreign, Commonwealth & Development Office, regulators and other authorities acting as processors or joint controllers based in the United Kingdom	To comply with legal and regulatory obligations.
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 Supplier 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 personal data outside the UK or European Economic Area (EEA).

Where you are providing services to us or one of our clients (on our behalf) in the capacity of a supplier or personnel of one of our suppliers 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 UK or 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 Supplier Privacy Notice.

These countries may not have similar data protection laws to the UK or 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 UK or 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 Plus and GDPR elements) which is re-certified 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 suppliers may work on a number of separate engagements for us from time-to-time and we may ask that our suppliers re-register with us as and when there are any changes to their details 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 above: *purposes for which we will use your personal data*.

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

9. Your legal rights

You have the following rights for any personal data we hold about 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.

10. Children

We do not permit suppliers or personnel of our suppliers to be under the age of 18 and will therefore not knowingly collect personal data in accordance with this Supplier 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). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance at mail@itad.com.

12. Changes to the Supplier Privacy Policy and your duty to inform us of changes

We will keep this Supplier Privacy Notice under regular review. This version was last updated March 2025. 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 e-mail suppliers@itad.com or by telephone on +44 (0)1273 765 250.