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Supplier Management System

The Pool Privacy Policy

This privacy policy sets out how **DRPG** business uses and protects any information that you provide us when you visit our website and where we collect and store data about you.

Introduction

This privacy policy aims to inform you about how **DRPG** collects and processes any information from you, or information that you provide to us. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information. It tells you about your privacy rights and how the law protects you.

DRPG is committed to protecting your privacy and the confidentiality of your personal information.

Our policy is not just an exercise in complying with the law, but a continuation of our respect for you and your personal information.

We undertake to preserve the confidentiality of all information you provide to us, and our policy complies with the Data Protection Act 2018 (Act) accordingly incorporating the EU General Data Protection Regulation (GDPR).

The law requires us to tell you about your rights and our obligations to you regarding the processing and control of your personal data.

Except as set out below, we do not share, sell or disclose any information to a third party but we do use third-party systems to process, store and transmit information collected through chosen partners.

Supply Chain Management, The Pool

DRPG has commissioned The Pool to ensure that we not only manage risk in our supply chain but also ensure our suppliers and freelancers have the right competencies and skills to deliver the services to both **DRPG** and our clients. To become a supplier to **DRPG**

you must be approved by the Supply Chain Management (SCM) team.

Data Controller

DRPG t/a DRP UK Ltd is the overall controller of the personal information we process, unless otherwise stated. The company number is 03653794 and it is registered in England.

Our registered address is 212 Ikon Estate, Droitwich Road, Hartlebury, DY10 4EU.
Tel: 01299 250531

Data Protection Officer

DRPG has appointed a data protection officer (DPO) who is responsible for ensuring this policy is followed. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using dpo@drpgroup.com or via our postal address and mark the envelope 'FAO Data Protection Officer'.

Data we process/ collection of personal information

We may "process" personal data about you and we collate this into groups as follows:

Your identity includes information such as first name, last name, title, and other identifiers that you may have provided, including emergency contact information if you will be working on our behalf.

Your contact information includes information such as email address, telephone numbers, and any other information you have given to us for the purposes of communications between you and **DRPG**.

Company information includes but is not limited to trading name, UTR number and associated files such as insurance documentation.

Transaction data includes details about payments (bank account information) or communications to and from you, and information about products and services you may provide to us. *Financial information provided is not shared or stored*

anywhere outside of our payment systems and is only accessible by our Finance team.

Supporting information such as certificates of insurance, supporting policy information and qualifications including CVs.

Technical data includes your internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.

Your profile includes information such as your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.

We may aggregate anonymous data, such as statistical or demographic data, for any purpose.

Anonymous data is data that does not identify you as an individual. Aggregated data may be derived from your personal data but is not considered personal information in law because it does not reveal your identity.

Collection of special personal information

Special personal information is data about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data.

We may collect special personal information about you if there is a lawful basis on which to do so.

It is our policy to collect only minimum information required to complete your request.

Use of personal information

We will not sell or lease your personal information to third parties unless we have your permission or are required by law to do so.

The bases on which we process information about you

The law requires us to determine under which of six defined bases we process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which we process your personal information is no longer relevant, then we shall immediately stop processing your data.

If a basis changes, then if required by law we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

We rely on one or more of the following processing conditions:

- Explicit consent
Our legitimate interests in the effective delivery of information and services to you
- To satisfy any legal and regulatory obligations to which we are subject
- To perform our obligations under the terms and conditions of a contract

Rights in relation to your information

Under data protection law, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information.

- Your right of access

You have the right to ask us for copies of your personal information. This right always applies. There are some exemptions, which means you may not always receive all the information we process.

- Your right to rectification

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies.

- Your right to erasure

You have the right to ask us to erase your personal information in certain circumstances.

- Your right to restrictions of processing

You have the right to ask us to restrict the processing of your information in certain circumstances.

- Your right to object processing

You have the right to object to processing if we are able to process your information because the process forms part of our public tasks or is in our legitimate interests.

- Your right to data portability

This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another or give it to you.

If you would like to exercise these rights or understand if these rights apply to you, please contact us by sending an email to: dpo@drpgroup.com

Sharing of information

We will not share your information with any third parties other than the specified Data Controller as listed in this policy, and we will not use any information for the purposes of direct marketing.

We may use data processors who are third parties, who provide elements of services for us as listed below. We have contracts in place with our data processors to ensure data is stored within the EU and the right security controls are in place to protect your data. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

Third parties used to provide this service

JotForm

<https://www.jotform.com/enterprise/security/>

Microsoft Power Platform

<https://docs.microsoft.com/en-us/power-platform/admin/security>

Retention of personal information and special personal information

Except as otherwise mentioned in this privacy notice, we keep your personal and special information only for as long as required by us, and:

- to provide you with the services you have requested
- to comply with other law

Third-party links

Our website may contain links to other websites provided by third parties not under our control.

When following a link and providing information on that link, please be aware that we are not responsible for the data provided to that third party.

This privacy policy only applies to the collection and storage of your data in our Supplier Management System – The Pool.

Encryption of data sent between us

We use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt any data you give us.

Whenever information is transferred between us and our third parties for collecting your data, you can check that it is done so using SSL by looking for a closed padlock symbol or other trust mark in your browser's URL bar or toolbar. All data recorded in encrypted in transit and at rest.

Compliance with the law

Our privacy policy has been compiled to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, we would like to hear from you.

How you can complain

If you are not happy with our privacy policy or if you have any complaint, then you should tell us.

If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office (ICO).

This can be done at <https://ico.org.uk/make-a-complaint/>. We would, however, appreciate the opportunity to talk to you about your concern before you approach the ICO.

Review of this privacy policy

DRPG may update this privacy notice from time-to-time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.

If you have any questions regarding our privacy policy, please contact us on the details above.