



GDPR POLICY

1. Introduction

- 1.1. Radius Group Limited (hereafter referred to as “we”, “our” or “us”), take your privacy seriously and we will use your personal information to administer your account and to provide the products and services you have requested from us.
- 1.2. Under the General Data Protection Regulations (GDPR) clear guidance has been provided; the following aims to clarify what we will do with your personal information.

2. What is personal information?

- 2.1. Personal information (or personal data) is defined broadly and comprises of data relating to any living individual who can be identified from that data. This includes:

• Names	• Telephone numbers
• Addresses	• Date of birth
• National insurance number	• Next of kin
• Health information	

3. Eight core principles of GDPR:

- i. Obtain and process the information fairly.
- ii. Keep it only for one or more specified and lawful purposes.
- iii. Process it only in ways compatible with the purposes for which it was given to Radius initially.
- iv. Keep it safe and secure.
- v. Keep it accurate and up-to-date.
- vi. Ensure it is adequate, relevant and not excessive.
- vii. Retain it no longer than is necessary for the specified purpose or purposes.
- viii. Give a copy of his/her personal information to any individual, on request.

4. How will we use the information about you?

- 4.1. **Employees:** to manage your employment with us.
- 4.2. **Customers:** to process your order(s) and manage your account with us.
- 4.3. **Suppliers:** to manage your account with us.

5. Who in Radius has responsibility for managing GDPR?

- 5.1. The Data Protection Adviser is the Financial Controller. Data Protection Administrators (processors of data) report to the Financial Controller for the purposes of GDPR, and are authorised to administer the relevant information on behalf of the business.

6. How is your personal information collected?

- 6.1. Personal information will be provided by you on our templates/forms; thereby ensuring you provide us with accurate information and you are fully aware of the information you have provided.

7. What are the lawful basis for processing?

- 7.1. We must apply at least one of these, whenever we process personal data:
 - A) **Consent:** you have given us a clear consent to process your personal data for a specific purpose.



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- B) Contract:** the processing is necessary for a contract we have with the individual (e.g. customer/supplier), or because you have asked us to take specific steps before entering into a contract.
- C) Legal obligation:** the processing is necessary for us to comply with the law (this does not include contractual obligations).
- D) Vital interest:** the processing is necessary to protect someone's life.
- E) Public task:** the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.
- F) Legitimate interests:** the processing is necessary for our legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

8. Under what lawful basis are you processing my personal data?

8.1. Employees:

Personal data will be processed under consent, legal obligations, vital interest and legitimate interest.

8.2. Customers & Suppliers:

Personal data will be processed under consent, contract and legal obligation.

9. What happens to this personal information?

9.1. Completed Radius forms will be managed by the HR team, Finance team and Compliance team. A soft copy (paper copy) will be kept in a secure and locked cabinet and a hard copy (electronic copy) will be kept within the relevant folder on our computer system. All copies, whether soft or hard copy, have restricted access.

10. Will your personal data be shared?

10.1. For employees, personal data will be shared with third parties (including training providers and customers) in-line with your training and health requirements for the business (e.g. medicals, training and driving licence checks) and with HRMC / Government Agencies in-line with current legislation requirements on a lawful basis.

10.2. Radius will be seeking to ensure that any third party is complying to GDPR and we will request a copy of their Privacy Notice prior to issuing any personal data.

10.3. For Customers and Suppliers; your personal data may be shared with third parties where it is necessary to do so by law, or where we need to administer our business.

11. Can I request to see what personal information you have on me?

11.1. Yes, you have the right to obtain;

- Confirmation that your data is being processed.
- Access to your personal data.

11.2. This is done by requesting a form from the Data Protection Administrators.

11.3. We have one calendar month to respond to your request and should we need to extend this, it will be done in agreement with yourselves.



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12. What happens if there is a data breach?

- 12.1. A personal data breach means a breach of security leading to the destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This means that a breach is more than just losing personal data.
- 12.2. Where a breach is likely to result in a risk to the rights and freedom of an individual this must be reported by us to the relevant supervisory authority (the Information Commissioners Office).
- 12.3. A breach must be assessed on a case-by-case basis, by our DPA's.

13. When and how will personal information be destroyed?

- 13.1. Personal information will be destroyed by means of deletion from our computer systems or by shredding paper copies in line with current regulations (e.g. HRMC or Employment Law).

14. REVIEW

- 14.1. This policy will be reviewed every two years in conjunction with our SHEQIMS, or sooner if there has been a breach or change in legislation. It will be readily available and communicated to staff and appropriate external parties.

Signature:

A handwritten signature in black ink, appearing to read "M Fryer".

Name:	Michael Fryer	Date:	30 th November 2021
Position:	Managing Director Radius Group Limited	Next review date:	29 th November 2023