

This policy applies to all companies under Churchill Contract Services Group Holdings Ltd to include the following subsidiaries and trading names:

- Churchill Contract Services (CCS)
- Amulet (Churchill Security Solutions) (AMU)
- Churchill Environmental Services (CES)
- Churchill Contract Catering t/a Radish (RAD)
- Chequers Contract Services Ltd (CHE)
- Chequers Electrical & Building Services Ltd (CEBS)
- Renovo Facilities & Services Ltd (RFS) (Joint Venture)

The Churchill Group regards Data Protection measures as a mutual objective for management and employees at all levels. It is our policy within Churchill Group Holdings Limited to guarantee the confidentiality, integrity, and availability of data. The General Data Protection Regulations (2016) and Data Protection Act (1996) applies to everyone who handles or who has access to information about individuals. The Regulations also gives rights to the people the information is about. By law everyone in the workplace must follow the rules set out in the act and help protect individuals' rights. Management gives full backing to this policy and will fully support any persons implementing it. Everyone within the workplace or with supervisory responsibility must recognise the need and accept responsibility for Data Protection.

Everyone in the workplace has a duty to protect the privacy of personal data, to ensure data is up to date and accurate, and to dispose of data in a timely and secure manner. Successful implementation of this policy requires the wholehearted commitment of everyone in the Company and acceptance by individual employees of their responsibilities. We're committed that the personal data we collect is appropriate for purpose and does not constitute an invasion of an individual's privacy.

This policy describes how and why we collect, retain and use utilise data and provides information about individuals' rights.

In this policy "we", "us" and "our" means the Churchill Group of companies' responsible for any personal information collected about you.

## **What personal data do we collect and process?**

Churchill collects personal data us that allows up to operate our business, this can come from our website or from anyone who we provide products or services to or who we might have dealings with during our normal operations.

Listed here are the details of how we process different types of data from the different sources we have.

### **Employment information**

Churchill personnel have their data collected and held in our systems, applications, and records.

### **Recruitment information**

Applicants who register or apply for a vacancy. Your name and contact details (address, email address & telephone) may be stored. We may collect more detailed information if the role requires a vetting process which may include details of your education, employment history, references, professional memberships and qualifications, credit check results, CRB checks, DVLA details and proof of identity documents.

- Information we collect may be used to process your application and to onboard you should you be successful in your application.

### **Suppliers, sub-contractors and partners**

We collect businesses contacts details including names, email addresses, telephone numbers, etc to offer services and subsequently on to our clients.

We use this information to enable us to carry out our business and to receive the services provided. This includes the use of personal information in connection with billing, invoicing, payment and legal enforcement.

## Clients

We collect personal data from our Clients where necessary to operate services or where a person has consented to its collection.

We may use the personal data collected to provide our products and services to you or your businesses including administration services and to managing our Client relationships e.g. publications/papers or events

## Media

Personal data including your name, email address, telephone number and business contact info is collected from you.

We may use the personal data we collect for the purposes of circulating press releases, statements or market commentary or inviting you to attend events or to meet or speak with Churchill personnel.

## Rights of access, correction, erasure, and restriction

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Under certain circumstances, by law you have the right to:

**Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it. The data subject access request process can be found in our Data Protection Policy set out in our Staff Handbook and available from [data@churchillservices.com](mailto:data@churchillservices.com)

**Request correction** of the personal information that we hold about you. This enables you have any incomplete or inaccurate information we hold about you corrected. If you wish to change your personal details you should submit a personal detail change form to your manager. If there are any other personal details which you believe are correct, please request changes via [data@churchillservices.com](mailto:data@churchillservices.com)

**Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

**Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

**Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

**Request the transfer** of your personal information to another party.

If you want to exercise any of the above rights, please contact [data@churchillservices.com](mailto:data@churchillservices.com)

## What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact [data@churchillservices.com](mailto:data@churchillservices.com). Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

## Our basis for processing data

We will only process personal data where we have identified a lawful basis on which to do so. The lawful basis is dependent on the type of data and how we process it. The basis for processing data will be one or more of the following

**Consent** – consent is given for Churchill to process data for a specific reason

**Contract** – a contract you have with Churchill means that we must process some of your personal data

**Vital interests** - the processing is necessary to protect someone's life

**Legal obligation** - the processing is necessary for us to comply with our legal obligations

**Legitimate interests** - the processing is necessary for our legitimate interests or the legitimate interests of a third party

## For how long do we hold personal data?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are set out in our Data Retention Policy which is available from [data@churchillservices.com](mailto:data@churchillservices.com)

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee, worker or contractor we will mark you as a Leaver on our system and this will reduce the level of access to your information. However we shall still maintain your information in accordance with our Data Retention Policy.

## Sharing your data

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so. We may also share your information with other companies within the group where there this is legitimate such as providing payroll or a shared administrative service.

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business, or a business outsourcing. We may also need to share your personal information with a regulator or to otherwise comply with the law or fraud

## Changing our Privacy Notice

Churchill reserve the right to update this policy at any time as well as to notify you from time to time about the processing of your personal data.

## Privacy Policy v5

CG-P-78



### Contact information

If you have any questions about this privacy notice or how we handle your personal information, please contact our Data Protection Officer:

**Robert Wassall**  
**Churchill Group Data Protection Officer**  
[robert.wassall@normcyber.com](mailto:robert.wassall@normcyber.com)

If you have a complaint in connection with the way we have processed your personal data 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. See [www.ico.org.uk](http://www.ico.org.uk)

### Cookie Policy

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and allows us to improve our site. A copy of our Cookie Policy can be found on the Churchill website.

This policy will be formally reviewed annually and updated as required.

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

Signed on behalf of Churchill Contract Services Group Holdings Ltd  
J.M. Briggs, Group CEO

Date: July 2022  
Review date: July 2023