

## STATEMENT

**CHURCHILL CONTRACT SERVICES GROUP HOLDINGS LTD** ('the Group', 'we', 'us', and 'our'), which includes 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)
- JV Price Ltd (JVP)

is committed to respecting and protecting the privacy of individuals and to fully complying with all the requirements of Data Protection Legislation.

We have appointed a Data Protection Officer (DPO) who can be contacted via [DPO@churchillservices.com](mailto:DPO@churchillservices.com).

## SCOPE

This notice applies to all our data subjects (those individuals whose personal information we collect and use).

This Privacy Notice explains, amongst other things:

- Why we may process your personal information
- What personal information we may collect about you
- How we may collect your personal information
- Why our processing of your personal information is lawful
- How we may use your personal information
- Who we may share your personal information with
- How long we may keep your personal information
- Your rights regarding your personal information

## GENERAL INFORMATION

### What is personal information?

Personal information is anything that enables you to be identified or identifiable. Examples are:

- First and last names
- Postal, email and IP addresses
- Telephone numbers
- Contact information

Your personal information is sometimes called "personal data". We collectively refer to handling, collecting, protecting, storing or otherwise using your personal information as 'processing'.

You do not have to provide any of your personal information to us, but if you do not provide all the information we ask for, we may not be able to do or provide what you want.

### COLLECTING (OBTAINING) YOUR PERSONAL INFORMATION

Below are some examples of how you may provide personal information to us:

- Asking us to provide information or services to you or someone else
- Contacting us
- Searching and browsing our website

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- Accessing our blog, on our website [www.churchillservices.com](http://www.churchillservices.com)
- Registering for or attending our events
- Providing us with business cards or other contact information
- Through our recruitment process, either directly from you, or from an employment, or recruitment agency. We may also collect additional information from third parties such as former employers for reference checks.
- Through our work relationship with us, you must provide necessary information for us to be able to fulfil our legal obligations in compliance with social security, tax law and regulations.
- Through your use of devices and/or services we provide to you for work purposes (i.e., use of computers/laptops, mobile phones, landlines, internet, VPN, etc.).
- From public records and other public sources, e.g., social media

We may also obtain some of the above personal information about you from third parties (other individuals or organisations) or from publicly available sources, for example social networks, company websites and public records.

### COOKIES

For information about the cookies and any other similar technologies we use, please see our [cookies policy](#).

### USING YOUR PERSONAL INFORMATION

When we collect your personal information, we may use it for any of the purposes described below or as stated at the point we collect it from you (or as may be obvious to you from the context of collection), including:

- To provide information, goods or services that you have requested
- To make a contact with you
- To administer and manage our website
- To ensure you are able to attend an event we host or sponsor
- To manage our relationship with you
- To create and manage customer/user accounts
- To develop our businesses and services
- To conduct quality and risk management reviews
- To manage your employment/working contact
- For any other purpose(s) for which your personal information has been provided to us, including any of the purposes given under 'Collecting your personal information' above

We do not collect personal information for sale to third parties.

### USING YOUR PERSONAL INFORMATION FOR MARKETING

Where we are legally required to do so, we will only provide you with marketing materials if you have given us your prior consent.

If you opt into any subscriptions, but later want to unsubscribe, you should look for and follow the instructions provided in our relevant communications to you.

If you choose to unsubscribe, we may retain some of your personal information to identify you, so that we can continue to honour your request and ensure that we do not continue to provide you with marketing materials

### OUR LEGAL GROUNDS FOR PROCESSING YOUR PERSONAL INFORMATION

We rely on one or more of the following:

**Consent:** We may process your personal information after you have consented (agreed) to us doing so. Your consent may have been obtained by us, or by third parties on our behalf. You have the right to withdraw your consent at any time.

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**Contract:** We may process your personal information when we need to deliver a contractual service to you or because you have asked us to do something before entering into a contract (e.g., provide a quote).

**Legal obligation:** We may process your personal information when we need to comply with a legal obligation.

**Legitimate interest:** We may process your personal information when we need to for our or another's legitimate interests, where these interests are not overridden by your rights.

### SHARING YOUR PERSONAL INFORMATION

We may share (disclose) your personal information with third parties (other organisations or individuals) for:

- The purposes for which the information has been submitted
- The purposes listed above under 'Using your personal information'
- As agreed between us

We may also transfer share or disclose your personal data to third party service providers of identity management, website hosting and management, data analysis, data backup, security and storage services.

These third parties may use subcontractors (also known as sub-processors) that have access to your personal data.

It is our policy to only share your personal information with third parties that are legally or contractually bound to protect your personal information to the same standards as we are, and that will flow those same standards to their subcontractors (subprocessors).

We may also share your personal information with third parties in connection with our corporate transactions, (e.g., mergers and/or acquisitions), as a result of which your personal information may be assigned to a third party.

We may also share your personal information to law enforcement, regulatory and other government agencies and to professional bodies and other third parties, as required by and/or in accordance with applicable law or regulation.

We may also share your personal information in the context of the possible sale or restructuring of our business, or a business outsourcing.

The type of third parties we may routinely or regularly share your personal information with are:

- Our external IT support providers
- Our software application suppliers and their hosting providers

### TRANSFERS OF YOUR PERSONAL INFORMATION TO OUTSIDE THE UK

Your personal information may be transferred outside the UK. Any such transfer will be only:

- To you; or
- To a recipient located in a country which provides an adequate level of protection for your personal information, for example a country in the European Union (EU), or European Economic Area (EEA); or
- To a recipient under a contractual agreement which satisfies UK legal requirements for the transfer of personal information, to ensure that appropriate safeguards are in place to protect your personal information in accordance with UK levels of data protection; or
- When your personal information has first been anonymised

### OUR RETENTION (STORAGE) OF YOUR PERSONAL INFORMATION

We will retain your personal information only for as long as we need it for the purpose(s) for which it was collected, or as required to do so by law.

To determine the appropriate retention period for your personal information, we consider the amount, nature, and sensitivity of it, the potential risk of harm from unauthorised use or disclosure of it, the purposes for which we process it and whether we can achieve those purposes through other means, as well as applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may keep it indefinitely and use it without further notice to you.

### **YOUR RIGHTS IN RESPECT OF OUR PROCESSING OF YOUR PERSONAL INFORMATION**

You have the right to be informed about our collection and use of your personal information. In particular, you may have the right to:

- Withdraw your previously provided consent to our processing of your personal information
- Request a copy of personal information we hold about you
- Ask that we update the personal information we hold about you, or correct such personal information that you think is incorrect or incomplete
- Ask that we delete personal information that we hold about you, or restrict the way in which we use such personal information
- Object to our processing of your personal information

To exercise your rights, please contact us.

### **SECURITY**

We are committed to protecting your personal information from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access and have implemented generally accepted standards of technology and operational security. Please be aware that, we cannot guarantee the security of all personal information transmitted to or by us.

### **AUTOMATED DECISION MAKING**

We will not use your personal information for automated decision making.

### **CHILDREN**

We understand the importance of protecting children's privacy and we never knowingly collect personal information about individuals under the age of 13.

### **CONTACT DETAILS**

We can be contacted as follows:

- Online: <https://www.churchillservices.com/contact-us/>.
- By email: [DPO@churchillservices.com](mailto:DPO@churchillservices.com).
- By post: Cedar House, Parkland Square, 750a Capability Green, Luton, Bedfordshire, United Kingdom, LU1 3LU

### **YOUR RIGHT TO LODGE A COMPLAINT WITH THE ICO**

If you have a complaint about the way we are handling your personal information or think we have not complied with our obligations under data protection law, you may contact the Information Commissioner's Office (ICO), which is the supervisory authority (regulator) in the UK.

You may make a complaint to the ICO as follows;

**Online:** <https://ico.org.uk/make-a-complaint/>.

**Live chat:** <https://ico.org.uk/global/contact-us/live-chat>.

**Tel:** 0303 123 1113.

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Please note you should raise your complaint with the ICO within three months of your last meaningful contact with us.

### UPDATING

We may update this Privacy notice at any time by publishing an updated version here. So that you know when we make changes, we will amend the revision date at the bottom of this page. The new modified or amended privacy notice will apply from that revision date.

This Privacy Notice was last updated on 31 January 2023.

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

Signed on behalf of Churchill Contract Services Group Holdings Ltd

A handwritten signature in black ink, appearing to be "J. Bradley", written in a cursive style.

J. Bradley, Group CEO

Date: January 2023

**Review date: January 2024**