

Orbis Protect Ltd - Records of Processing Activities

Supervisory Authority

Name Information Commissioner's Office
Address Water Lane, Wycliffe House
Wilmslow - Cheshire SK9 5AF
Email casework@ico.org.uk
Contact Person
EU State United Kingdom

Controller

Controller Name Orbis Protect Ltd
Head of Organisation / Owner Shaun Wilcock
Postal Address Beaufort House
Cricket Field Road
UB8 1QG
Physical Address Beaufort House
Cricket Field Road
UB8 1QG
Landline 447387259833
Email shaun.wilcock@orbisprotect.com
Country United Kingdom

Data Protection Officer

Name Shaun Wilcock
Email shaun.wilcock@orbisprotect.com
Landline 08000 830 850
Mobile
Address Riverview House
Dock Road South

1. Details of Processing

Data Subject Type	Processing Purpose	
Customers and Clients (Customers and clients)	Administrative enquiries Legal Basis: <i>6(1)(f) - it's in our legitimate interest</i> Retention Period: <i>Until consent withdrawn</i>	Personal Data Category Digital Images Visual Images Photographs together with Identifiers

Online Identifiers
Banking Details
Identification Number
Name
Identifiers-Member - Country of Residence
Email, Social Networks
Financial Details
Location Information
Telephone contact details

**Communications,
marketing and
intelligence**

Legal Basis:
*6(1)(f) - it's in our legitimate
interest*
Retention Period:
Until consent withdrawn

Personal Data Category

Email, Social Networks
Location Information
Name
Identifiers-Member - Country of Residence
Online Identifiers
Telephone contact details

**Fraud detection and
prevention**

Legal Basis:
*6(1)(f) - it's in our legitimate
interest*
Retention Period:
Until consent withdrawn

Personal Data Category

Banking Details
Credit History
Confidential Correspondence
Email, Social Networks
Financial Details
Identification Number
Location Information
Name
Identifiers-Member - Country of Residence
Telephone contact details
Identifiers-Member - Name
Online Identifiers
Photographs together with Identifiers

Identity verification

Legal Basis:
*6(1)(f) - it's in our legitimate
interest*
Retention Period:
Until consent withdrawn

Personal Data Category

Banking Details
Confidential Correspondence
Credit History
Financial Details
Identification Number
Location Information

Name
 Identifiers-Member - Country of Residence
 Telephone contact details
 Photographs together with Identifiers
 Email, Social Networks

Information, system, network and cyber security

Legal Basis:
6(1)(f) - it's in our legitimate interest
 Retention Period:
Until consent withdrawn

Personal Data Category

Identification Number
 Location Information
 Online Identifiers
 Telephone contact details

Name
 Identifiers-Member - Country of Residence
 Email, Social Networks

Personalisation and customisation of the online experience

Legal Basis:
6(1)(f) - it's in our legitimate interest
 Retention Period:
Until consent withdrawn

Personal Data Category

Identification Number
 Location Information
 Online Identifiers
 Identifiers-Member - Country of Residence

Name

Product development and enhancement

Legal Basis:
6(1)(f) - it's in our legitimate interest
 Retention Period:
Until consent withdrawn

Personal Data Category

Location Information
 Identifiers-Member - Country of Residence
 Name

Sales and Distribution of Products and Services

Legal Basis:
6(1)(f) - it's in our legitimate interest
 Retention Period:
Until consent withdrawn

Personal Data Category

Confidential Correspondence
 Financial Details
 Location Information
 Identification Number
 Name
 Identifiers-Member - Country of Residence
 Telephone contact details
 Photographs together with Identifiers
 Visual Images
 Email, Social Networks
 Identifiers-Member - Name

Service delivery

Legal Basis:
6(1)(b) - we have a contract with the data subject
Retention Period:
1 Year unless otherwise required by customer contract

Personal Data Category

Confidential Correspondence
Digital Images
Email, Social Networks
Financial Details
Identification Number
Location Information
Name
Identifiers-Member - Country of Residence
Online Identifiers
Photographs together with Identifiers
Telephone contact details
Visual Images
Banking Details
Identifiers-Member - Name

Site management and security

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
Until consent withdrawn

Personal Data Category

Visual Images
Identifiers-Member - Country of Residence
Name
Digital Images
Location Information
Photographs together with Identifiers

Video surveillance

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
1 month

Personal Data Category

Photographs together with Identifiers
Location Information
Email, Social Networks
Visual Images
Digital Images

Location Information

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
Until consent withdrawn

Personal Data Category

Confidential Correspondence
Location Information
Name
Identifiers-Member - Country of Residence

Audio Recordings

Legal Basis:
6(1)(f) - it's in our legitimate

Personal Data Category

Identifiers-Member - Name
Telephone contact details

interest

Retention Period:

1 year

Customer analysis

Legal Basis:

6(1)(f) - it's in our legitimate interest

Retention Period:

Until consent withdrawn

Personal Data Category

Identifiers-Member - Country of Residence

Location Information

Telephone contact details

Online Identifiers

Contact management

Legal Basis:

6(1)(f) - it's in our legitimate interest

Retention Period:

Until consent withdrawn

Personal Data Category

Banking Details

Name

Location Information

Telephone contact details

Identifiers-Member - Country of Residence

Debt management

Legal Basis:

6(1)(b) - we have a contract with the data subject

Retention Period:

As long as validly required

Personal Data Category

Banking Details

Name

Identifiers-Member - Country of Residence

Telephone contact details

Credit History

Confidential Correspondence

Identifiers-Member - Name

Financial Details

Identification Number

Payment Card Processing

Legal Basis:

6(1)(b) - we have a contract with the data subject

Retention Period:

1 Year unless otherwise required by customer contract

Personal Data Category

Banking Details

Name

Identifiers-Member - Country of Residence

Financial Details

Identification Number

Customer support

Legal Basis:

6(1)(b) - we have a contract with the data subject

Retention Period:

1 Year unless otherwise required by customer contract

Personal Data Category

Banking Details

Confidential Correspondence

Credit History

Financial Details

Location Information

Identifiers-Member - Name

Email, Social Networks

Name

Identifiers-Member - Country of Residence

Online Identifiers

Employees / Prospective Employees
(Employee)

Administrative enquiries

Legal Basis:
6(1)(f) - it's in our legitimate interest

Retention Period:
Until consent withdrawn

Personal Data Category

Banking Details

Confidential Correspondence

Digital Images

Education History

Email, Social Networks

Employee Performance Data

Employment History

Family

Identification Number

Financial Details

Location Information

Name

Identifiers-Member - Country of Residence

Online Identifiers

Telephone contact details

Photographs together with Identifiers

Visual Images

Credit History

Special category personal data type **Legal basis**

Health 9(2)(a) - Explicit consent of the data subject

Racial or Ethnic Origin 9(2)(a) - Explicit consent of the data subject

Religious or Philosophical beliefs 9(2)(a) - Explicit consent of the data subject

Sex life or Sexual orientation 9(2)(a) - Explicit consent of the data subject

Special Educational Needs 9(2)(a) - Explicit consent of the data subject

Archiving

Legal Basis:
6(1)(f) - it's in our legitimate interest

Retention Period:
Until consent withdrawn

Personal Data Category

Banking Details

Confidential Correspondence

Credit History

Digital Images
 Education History
 Email, Social Networks
 Employee Performance Data
 Employment History
 Family
 Financial Details
 Identification Number
 Location Information
 Name
 Identifiers-Member - Country of Residence
 Photographs together with Identifiers
 Online Identifiers
 Telephone contact details
 Visual Images

Special category personal data type	Legal basis
Health	9(2)(a) - Explicit consent of the data subject
Racial or Ethnic Origin	9(2)(a) - Explicit consent of the data subject
Religious or Philosophical beliefs	9(2)(a) - Explicit consent of the data subject
Sex life or Sexual orientation	9(2)(a) - Explicit consent of the data subject
Special Educational Needs	9(2)(a) - Explicit consent of the data subject

Budget management

Legal Basis:
6(1)(f) - it's in our legitimate interest
 Retention Period:
Until consent withdrawn

Personal Data Category

Confidential Correspondence
 Email, Social Networks
 Financial Details
 Name
 Identifiers-Member - Country of Residence

Business operations and due diligence

Legal Basis:
6(1)(f) - it's in our legitimate interest
 Retention Period:
Until consent withdrawn

Personal Data Category

Banking Details
 Confidential Correspondence
 Credit History
 Education History
 Email, Social Networks

Employee Performance Data
 Employment History
 Financial Details
 Location Information
 Name
 Identification Number
 Identifiers-Member - Country of Residence
 Online Identifiers
 Photographs together with Identifiers
 Telephone contact details
 Visual Images

Contact management

Legal Basis:
6(1)(f) - it's in our legitimate interest
 Retention Period:
Until consent withdrawn

Personal Data Category

Location Information
 Identification Number
 Name
 Identifiers-Member - Country of Residence
 Photographs together with Identifiers
 Visual Images
 Email, Social Networks
 Confidential Correspondence

Employee monitoring

Legal Basis:
6(1)(f) - it's in our legitimate interest
 Retention Period:
Until consent withdrawn

Personal Data Category

Identifiers-Member - Name
 Credit History
 Email, Social Networks
 Confidential Correspondence
 Employee Performance Data
 Employment History
 Name
 Identifiers-Member - Country of Residence
 Telephone contact details
 Visual Images

Employee performance management

Legal Basis:
6(1)(f) - it's in our legitimate interest
 Retention Period:
Until consent withdrawn

Personal Data Category

Confidential Correspondence
 Identifiers-Member - Name
 Employee Performance Data
 Email, Social Networks
 Digital Images

Visual Images
 Identifiers-Member - Country of Residence
 Name
 Location Information
 Employment History

Employee Recruitment and Employment

Legal Basis:
6(1)(f) - it's in our legitimate interest
 Retention Period:
Until consent withdrawn

Personal Data Category

Confidential Correspondence
 Identifiers-Member - Name
 Credit History
 Digital Images
 Education History
 Email, Social Networks
 Employee Performance Data
 Employment History
 Financial Details
 Identification Number
 Location Information
 Name
 Identifiers-Member - Country of Residence
 Online Identifiers
 Photographs together with Identifiers
 Telephone contact details
 Visual Images
 Banking Details
 Family

Special category personal data type	Legal basis
Racial or Ethnic Origin	9(2)(a) - Explicit consent of the data subject
Religious or Philosophical beliefs	9(2)(a) - Explicit consent of the data subject
Sex life or Sexual orientation	9(2)(a) - Explicit consent of the data subject
Health	9(2)(a) - Explicit consent of the data subject
Criminal Record Checks	9(2)(a) - Explicit consent of the data subject

Fraud detection and prevention

Personal Data Category

Online Identifiers

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
Until consent withdrawn

Location Information
Employment History
Identifiers-Member - Name
Confidential Correspondence
Email, Social Networks
Credit History
Name
Identifiers-Member - Country of Residence

Identity verification

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
Until consent withdrawn

Personal Data Category

Identification Number
Financial Details
Employment History
Email, Social Networks
Digital Images
Education History
Banking Details
Confidential Correspondence
Credit History
Location Information
Name
Identifiers-Member - Country of Residence
Online Identifiers
Photographs together with Identifiers
Telephone contact details
Visual Images

Industry specific regulation, standards and intelligence

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
Until consent withdrawn

Personal Data Category

Identifiers-Member - Country of Residence
Name
Visual Images
Photographs together with Identifiers
Telephone contact details
Online Identifiers
Location Information
Identifiers-Member - Name
Confidential Correspondence
Email, Social Networks

Personal Data Category

Information, system, network and cyber security

Legal Basis:
6(1)(f) - it's in our legitimate interest
 Retention Period:
Until consent withdrawn

Identification Number
 Name
 Location Information
 Identifiers-Member - Country of Residence
 Online Identifiers

Legal and regulatory compliance

Legal Basis:
6(1)(c) - we have to comply with a legal obligation
 Retention Period:
Until consent withdrawn

Personal Data Category

Identifiers-Member - Name
 Confidential Correspondence
 Digital Images
 Education History
 Credit History
 Employee Performance Data
 Employment History
 Financial Details
 Identification Number
 Location Information
 Name
 Identifiers-Member - Country of Residence
 Telephone contact details
 Visual Images
 Photographs together with Identifiers

Organisation's administration and management

Legal Basis:
6(1)(f) - it's in our legitimate interest
 Retention Period:
Until consent withdrawn

Personal Data Category

Banking Details
 Confidential Correspondence
 Credit History
 Digital Images
 Location Information
 Name
 Identifiers-Member - Country of Residence
 Online Identifiers
 Photographs together with Identifiers
 Telephone contact details
 Visual Images
 Financial Details
 Identification Number

Personal Data Category

Personalisation and customisation of the online experience

Online Identifiers
Name

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
Until consent withdrawn

Site management and security

Personal Data Category

Identification Number
Location Information
Name
Identifiers-Member - Country of Residence
Online Identifiers
Visual Images
Digital Images

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
Until consent withdrawn

Student affairs' administration and management

Personal Data Category

Banking Details
Confidential Correspondence
Identifiers-Member - Name
Digital Images
Education History

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
Until consent withdrawn

Travel and events management

Personal Data Category

Location Information
Identification Number
Name
Identifiers-Member - Country of Residence
Telephone contact details
Confidential Correspondence

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
Until consent withdrawn

Video surveillance

Personal Data Category

Visual Images
Digital Images

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
1 month

Governing Body (Other)

Organisation's administration and management

Personal Data Category

Confidential Correspondence
Name
Identifiers-Member - Country of Residence
Location Information

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:

Until tax or other retention period expires

Telephone contact details
Identifiers-Member - Name

Industry specific regulation, standards and intelligence

Personal Data Category

Legal Basis:
6(1)(c) - we have to comply with a legal obligation
Retention Period:
Until tax or other retention period expires

Identifiers-Member - Name
Confidential Correspondence
Location Information
Name
Identifiers-Member - Country of Residence
Telephone contact details

Service delivery

Personal Data Category

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
Until tax or other retention period expires

Identifiers-Member - Name
Confidential Correspondence
Digital Images
Email, Social Networks
Employee Performance Data
Location Information
Name
Identifiers-Member - Country of Residence
Telephone contact details
Visual Images
Photographs together with Identifiers

Prospects and leads (Other)

Identity verification

Personal Data Category

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
Until consent withdrawn

Online Identifiers
Location Information
Name
Identifiers-Member - Country of Residence
Telephone contact details
Email, Social Networks

Personalisation and customisation of the online experience

Personal Data Category

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
Until consent withdrawn

Online Identifiers

Site management and security

Personal Data Category

Location Information

	<p>Legal Basis: <i>6(1)(f) - it's in our legitimate interest</i></p> <p>Retention Period: <i>Until consent withdrawn</i></p>	<p>Online Identifiers</p>
	<p>Information, system, network and cyber security</p>	<p>Personal Data Category</p>
	<p>Legal Basis: <i>6(1)(f) - it's in our legitimate interest</i></p> <p>Retention Period: <i>Until consent withdrawn</i></p>	<p>Location Information</p> <p>Online Identifiers</p>
Children (Child)	<p>Employee Recruitment and Employment</p>	<p>Personal Data Category</p>
	<p>Legal Basis: <i>6(1)(f) - it's in our legitimate interest</i></p> <p>Retention Period: <i>Until consent withdrawn</i></p>	<p>Name</p> <p>Identifiers-Member - Country of Residence</p> <p>Family</p>
	<p>Identity verification</p>	<p>Personal Data Category</p>
	<p>Legal Basis: <i>6(1)(f) - it's in our legitimate interest</i></p> <p>Retention Period: <i>Until consent withdrawn</i></p>	<p>Name</p> <p>Identifiers-Member - Country of Residence</p> <p>Family</p>
Suppliers (Supplier)	<p>Identity verification</p>	<p>Personal Data Category</p>
	<p>Legal Basis: <i>6(1)(f) - it's in our legitimate interest</i></p> <p>Retention Period: <i>Until consent withdrawn</i></p>	<p>Banking Details</p> <p>Confidential Correspondence</p> <p>Financial Details</p> <p>Identification Number</p> <p>Location Information</p> <p>Name</p> <p>Identifiers-Member - Country of Residence</p> <p>Telephone contact details</p> <p>Visual Images</p> <p>Photographs together with Identifiers</p>
	<p>Information, system, network and cyber security</p>	<p>Personal Data Category</p>
	<p>Legal Basis: <i>6(1)(f) - it's in our legitimate interest</i></p> <p>Retention Period: <i>Until consent withdrawn</i></p>	<p>Email, Social Networks</p> <p>Confidential Correspondence</p> <p>Identification Number</p> <p>Location Information</p> <p>Identifiers-Member - Country of Residence</p> <p>Online Identifiers</p>

Organisation's administration and management

Legal Basis:
6(1)(f) - it's in our legitimate interest
 Retention Period:
Until consent withdrawn

Telephone contact details
 Digital Images
 Visual Images

Personal Data Category

Banking Details
 Confidential Correspondence
 Email, Social Networks
 Identifiers-Member - Name
 Employee Performance Data
 Financial Details
 Identification Number
 Location Information
 Name
 Identifiers-Member - Country of Residence
 Online Identifiers
 Photographs together with Identifiers
 Telephone contact details
 Visual Images

Personalisation and customisation of the online experience

Legal Basis:
6(1)(f) - it's in our legitimate interest
 Retention Period:
Until consent withdrawn

Personal Data Category

Online Identifiers
 Identifiers-Member - Country of Residence
 Name
 Location Information
 Identification Number

Supplier Management

Legal Basis:
6(1)(b) - we have a contract with the data subject
 Retention Period:
As long as validly required

Personal Data Category

Financial Details
 Name
 Identifiers-Member - Country of Residence
 Telephone contact details
 Location Information
 Identification Number
 Banking Details

Service delivery

Legal Basis:
6(1)(b) - we have a contract with the data subject
 Retention Period:
As long as validly required

Personal Data Category

Banking Details
 Identifiers-Member - Name
 Email, Social Networks

Location Information
 Financial Details
 Identification Number
 Name
 Identifiers-Member - Country of Residence
 Online Identifiers
 Telephone contact details

Consultants
(Supplier)

Administrative enquiries

Legal Basis:
6(1)(f) - it's in our legitimate interest
 Retention Period:
Until consent withdrawn

Personal Data Category

Banking Details
 Confidential Correspondence
 Email, Social Networks
 Financial Details
 Name
 Location Information
 Identifiers-Member - Country of Residence
 Telephone contact details

Archiving

Legal Basis:
6(1)(f) - it's in our legitimate interest
 Retention Period:
Until consent withdrawn

Personal Data Category

Banking Details
 Identifiers-Member - Name
 Confidential Correspondence
 Email, Social Networks
 Financial Details
 Location Information
 Name
 Telephone contact details

Budget management

Legal Basis:
6(1)(f) - it's in our legitimate interest
 Retention Period:
Until consent withdrawn

Personal Data Category

Name
 Financial Details
 Banking Details
 Email, Social Networks
 Identifiers-Member - Country of Residence
 Telephone contact details

Contact management

Legal Basis:
6(1)(f) - it's in our legitimate interest
 Retention Period:
Until consent withdrawn

Personal Data Category

Name
 Identifiers-Member - Country of Residence
 Confidential Correspondence

Fraud detection and prevention

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
Until consent withdrawn

Email, Social Networks

Personal Data Category

- Identifiers-Member - Name
- Banking Details
- Confidential Correspondence
- Credit History
- Employee Performance Data
- Employment History
- Financial Details
- Identification Number
- Location Information
- Name
- Identifiers-Member - Country of Residence
- Online Identifiers
- Telephone contact details
- Photographs together with Identifiers

Identity verification

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
Until consent withdrawn

Personal Data Category

- Name
- Identifiers-Member - Country of Residence
- Confidential Correspondence
- Employee Performance Data
- Telephone contact details
- Photographs together with Identifiers
- Identification Number
- Visual Images
- Online Identifiers

Industry specific regulation, standards and intelligence

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
Until consent withdrawn

Personal Data Category

- Confidential Correspondence
- Identification Number
- Location Information
- Name
- Identifiers-Member - Country of Residence
- Photographs together with Identifiers
- Telephone contact details
- Visual Images

Personal Data Category

Information, system, network and cyber security

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
Until consent withdrawn

Email, Social Networks
Identification Number
Location Information
Name
Identifiers-Member - Country of Residence
Confidential Correspondence
Telephone contact details
Photographs together with Identifiers
Online Identifiers
Visual Images

Legal and regulatory compliance

Legal Basis:
6(1)(c) - we have to comply with a legal obligation
Retention Period:
Until tax or other retention period expires

Personal Data Category

Name
Identifiers-Member - Country of Residence

Organisation's administration and management

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
Until consent withdrawn

Personal Data Category

Confidential Correspondence
Banking Details
Email, Social Networks
Employee Performance Data
Employment History
Financial Details
Identification Number
Location Information
Name
Identifiers-Member - Country of Residence
Online Identifiers
Photographs together with Identifiers
Telephone contact details
Visual Images

Personalisation and customisation of the online experience

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
Until consent withdrawn

Personal Data Category

Online Identifiers

Supplier Management

Legal Basis:
6(1)(b) - we have a contract with the data subject
 Retention Period:
As long as validly required

Personal Data Category

- Confidential Correspondence
- Credit History
- Digital Images
- Email, Social Networks
- Employee Performance Data
- Employment History
- Family
- Financial Details
- Identification Number
- Location Information
- Name
- Identifiers-Member - Country of Residence
- Online Identifiers
- Photographs together with Identifiers
- Telephone contact details
- Visual Images
- Banking Details
- Education History

Video surveillance

Legal Basis:
6(1)(f) - it's in our legitimate interest
 Retention Period:
1 month

Personal Data Category

- Visual Images
- Location Information

Contractors (Supplier)

Administrative enquiries

Legal Basis:
6(1)(f) - it's in our legitimate interest
 Retention Period:
Until consent withdrawn

Personal Data Category

- Confidential Correspondence
- Identifiers-Member - Name
- Location Information
- Name
- Identifiers-Member - Country of Residence
- Telephone contact details
- Photographs together with Identifiers
- Email, Social Networks
- Financial Details
- Identification Number
- Visual Images

Archiving

Personal Data Category

- Identifiers-Member - Name

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
Until consent withdrawn

Banking Details
Confidential Correspondence
Credit History
Digital Images
Education History
Email, Social Networks
Employee Performance Data
Employment History
Financial Details
Identification Number
Location Information
Name
Identifiers-Member - Country of Residence
Online Identifiers
Photographs together with Identifiers
Telephone contact details
Visual Images

Budget management

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
Until consent withdrawn

Personal Data Category

Banking Details
Confidential Correspondence
Credit History
Financial Details
Identification Number
Name
Location Information
Identifiers-Member - Country of Residence
Telephone contact details

Business operations and due diligence

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
Until consent withdrawn

Personal Data Category

Identifiers-Member - Name
Confidential Correspondence
Banking Details
Credit History
Digital Images
Education History
Email, Social Networks
Employee Performance Data
Financial Details

Employment History
Location Information
Identification Number
Name
Identifiers-Member - Country of Residence
Online Identifiers
Visual Images
Photographs together with Identifiers
Telephone contact details

Contact management

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
Until consent withdrawn

Personal Data Category

Confidential Correspondence
Location Information
Name
Identifiers-Member - Country of Residence
Telephone contact details

Fraud detection and prevention

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
Until consent withdrawn

Personal Data Category

Identifiers-Member - Name
Banking Details
Credit History
Confidential Correspondence
Digital Images
Education History
Email, Social Networks
Employee Performance Data
Employment History
Financial Details
Identification Number
Location Information
Name
Identifiers-Member - Country of Residence
Online Identifiers
Photographs together with Identifiers
Telephone contact details
Visual Images

Identity verification

Legal Basis:
6(1)(f) - it's in our legitimate interest

Personal Data Category

Identification Number
Location Information

Retention Period:
Until consent withdrawn

Name
Identifiers-Member - Country of Residence
Online Identifiers
Photographs together with Identifiers
Telephone contact details
Visual Images
Digital Images

Industry specific regulation, standards and intelligence

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
Until consent withdrawn

Personal Data Category
Employment History
Employee Performance Data
Financial Details
Credit History
Identification Number
Location Information
Name
Identifiers-Member - Country of Residence
Identifiers-Member - Name

Information, system, network and cyber security

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
Until consent withdrawn

Personal Data Category
Identifiers-Member - Name
Email, Social Networks
Identification Number
Location Information
Name
Online Identifiers
Identifiers-Member - Country of Residence
Visual Images

Legal and regulatory compliance

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
Until consent withdrawn

Personal Data Category
Name
Identifiers-Member - Country of Residence
Employment History
Financial Details
Credit History
Photographs together with Identifiers
Telephone contact details
Visual Images
Online Identifiers
Banking Details

Organisation's administration and management

Legal Basis:
6(1)(f) - it's in our legitimate interest
 Retention Period:
Until consent withdrawn

Confidential Correspondence
 Digital Images
 Location Information

Personal Data Category

Identifiers-Member - Name
 Banking Details
 Confidential Correspondence
 Credit History
 Digital Images
 Education History
 Email, Social Networks
 Employee Performance Data
 Employment History
 Financial Details
 Identification Number
 Location Information
 Name
 Identifiers-Member - Country of Residence
 Online Identifiers
 Photographs together with Identifiers
 Visual Images
 Telephone contact details

Personalisation and customisation of the online experience

Legal Basis:
6(1)(f) - it's in our legitimate interest
 Retention Period:
Until consent withdrawn

Personal Data Category

Online Identifiers

Service delivery

Legal Basis:
6(1)(f) - it's in our legitimate interest
 Retention Period:
Until consent withdrawn

Personal Data Category

Location Information
 Name
 Identifiers-Member - Country of Residence
 Telephone contact details
 Visual Images
 Photographs together with Identifiers
 Online Identifiers
 Digital Images

Identification Number
Credit History
Identifiers-Member - Name

Site management and security

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
Until consent withdrawn

Personal Data Category

Visual Images
Location Information
Photographs together with Identifiers
Name
Identifiers-Member - Country of Residence

Supplier Management

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
Until consent withdrawn

Personal Data Category

Banking Details
Confidential Correspondence
Email, Social Networks
Financial Details
Identification Number
Location Information
Name
Identifiers-Member - Country of Residence
Online Identifiers
Telephone contact details
Visual Images

Video surveillance

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
1 month

Personal Data Category

Visual Images
Location Information

Audio Recordings

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
1 year

Personal Data Category

Identifiers-Member - Name

Travel and events management

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
Until consent withdrawn

Personal Data Category

Location Information
Name
Identifiers-Member - Country of Residence
Telephone contact details

Escalation Details

Personal Data Category

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
Until consent withdrawn

Name
Identifiers-Member - Country of Residence
Telephone contact details
Identifiers-Member - Name
Confidential Correspondence

Location Information

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
Until consent withdrawn

Personal Data Category

Location Information
Name

Parents (Child)

Employee Recruitment and Employment

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
Until consent withdrawn

Personal Data Category

Family
Name
Identifiers-Member - Country of Residence
Telephone contact details

Service Providers (Supplier)

Administrative enquiries

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
Until consent withdrawn

Personal Data Category

Confidential Correspondence
Credit History
Financial Details
Name
Location Information
Identification Number
Identifiers-Member - Country of Residence
Telephone contact details

Archiving

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
Until consent withdrawn

Personal Data Category

Identifiers-Member - Name
Banking Details
Confidential Correspondence
Credit History
Digital Images
Email, Social Networks
Financial Details
Identification Number
Location Information
Name
Identifiers-Member - Country of Residence
Telephone contact details

Budget management

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
Until consent withdrawn

Personal Data Category

Banking Details
Identifiers-Member - Name
Email, Social Networks
Financial Details
Identification Number
Location Information
Name
Identifiers-Member - Country of Residence
Telephone contact details

Contact management

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
Until consent withdrawn

Personal Data Category

Identifiers-Member - Name
Confidential Correspondence
Email, Social Networks
Financial Details
Identification Number
Location Information
Name
Identifiers-Member - Country of Residence
Telephone contact details

Fraud detection and prevention

Legal Basis:
6(1)(f) - it's in our legitimate interest
Retention Period:
Until consent withdrawn

Personal Data Category

Identifiers-Member - Name
Banking Details
Credit History
Email, Social Networks
Employee Performance Data
Employment History
Financial Details
Identification Number
Location Information
Name
Identifiers-Member - Country of Residence
Photographs together with Identifiers
Telephone contact details
Visual Images

Identity verification

Personal Data Category

Identifiers-Member - Name

Legal Basis:
6(1)(f) - it's in our legitimate interest
 Retention Period:
Until consent withdrawn

- Banking Details
- Confidential Correspondence
- Digital Images
- Email, Social Networks
- Location Information
- Identification Number
- Name
- Identifiers-Member - Country of Residence
- Online Identifiers
- Photographs together with Identifiers
- Telephone contact details
- Visual Images

Industry specific regulation, standards and intelligence

Legal Basis:
6(1)(f) - it's in our legitimate interest
 Retention Period:
Until consent withdrawn

- Personal Data Category**
- Identifiers-Member - Name
 - Confidential Correspondence
 - Banking Details
 - Credit History
 - Email, Social Networks
 - Identification Number
 - Financial Details
 - Name
 - Location Information
 - Identifiers-Member - Country of Residence
 - Online Identifiers
 - Photographs together with Identifiers
 - Telephone contact details
 - Visual Images

Service delivery

Legal Basis:
6(1)(b) - we have a contract with the data subject
 Retention Period:
As long as validly required

- Personal Data Category**
- Identifiers-Member - Name
 - Confidential Correspondence
 - Digital Images
 - Email, Social Networks
 - Identification Number
 - Location Information
 - Name
 - Identifiers-Member - Country of Residence
 - Online Identifiers

Telephone contact details
 Photographs together with Identifiers
 Visual Images

Supplier Management

Legal Basis:
6(1)(b) - we have a contract with the data subject
 Retention Period:
As long as validly required

Personal Data Category

Banking Details
 Identifiers-Member - Name
 Confidential Correspondence
 Credit History
 Digital Images
 Financial Details
 Identification Number
 Location Information
 Identifiers-Member - Country of Residence
 Name
 Online Identifiers
 Photographs together with Identifiers
 Telephone contact details
 Visual Images

Lone Worker End Users
 (Customers and clients)

Administrative enquiries

Legal Basis:
6(1)(f) - it's in our legitimate interest
 Retention Period:
Until consent withdrawn

Personal Data Category

Confidential Correspondence
 Email, Social Networks
 Location Information
 Name
 Identifiers-Member - Country of Residence
 Telephone contact details

Special category personal data type **Legal basis**

Health 9(2)(a) - Explicit consent of the data subject

Archiving

Legal Basis:
6(1)(f) - it's in our legitimate interest
 Retention Period:
Until consent withdrawn

Personal Data Category

Confidential Correspondence
 Email, Social Networks
 Identifiers-Member - Country of Residence
 Online Identifiers
 Telephone contact details

Special category personal data type **Legal basis**

Health 9(2)(a) - Explicit consent of the

data subject

Audio Recordings

Legal Basis:
6(1)(b) - we have a contract with the data subject
 Retention Period:
1 Year unless otherwise required by customer contract

Personal Data Category

Identification Number
 Location Information
 Name
 Identifiers-Member - Country of Residence
 Online Identifiers
 Identifiers-Member - Name

Special category personal data type **Legal basis**

Health 9(2)(a) - Explicit consent of the data subject

Escalation Details

Legal Basis:
6(1)(f) - it's in our legitimate interest
 Retention Period:
Until contract completed

Personal Data Category

Name
 Identifiers-Member - Country of Residence
 Telephone contact details

Contact management

Legal Basis:
6(1)(f) - it's in our legitimate interest
 Retention Period:
Until consent withdrawn

Personal Data Category

Name
 Identifiers-Member - Country of Residence
 Telephone contact details

Special category personal data type **Legal basis**

Health 9(2)(a) - Explicit consent of the data subject

Customer support

Legal Basis:
6(1)(f) - it's in our legitimate interest
 Retention Period:
Until consent withdrawn

Personal Data Category

Confidential Correspondence
 Identifiers-Member - Name
 Location Information
 Name
 Identifiers-Member - Country of Residence
 Online Identifiers
 Telephone contact details

Special category personal data type **Legal basis**

Health 9(2)(a) - Explicit consent of the data subject

Location Information

Personal Data Category

Location Information

Legal Basis: <i>6(1)(f) - it's in our legitimate interest</i>	Name
Retention Period: <i>1 Year unless otherwise required by customer contract</i>	Identifiers-Member - Country of Residence
	Telephone contact details
	Identifiers-Member - Name

Response Centre Services
(Customers and clients)

Administrative enquiries

Legal Basis:
Retention Period:

Audio Recordings

Legal Basis:
Retention Period:

Contact management

Legal Basis:
Retention Period:

2. We disclose personal data to the following recipients

Organisation name	Type	Category	Country
HMRC	Processor	Public Body	
Cascade HR Cloud Platform	Processor	Payroll and HR System	United Kingdom
Salesforce	Processor	CRM	
Office365	Processor	SaaS Provider	
Mimecast	Processor	SaaS Provider	
Amazon AWS	Processor	IaaS Provider	
HMRC	Controller	Government	United Kingdom
Banking Provider	Controller	Banking Provider	United Kingdom
Companies House	Controller	Government	United Kingdom
Commercial Finance Provider	Controller	Financial institution	United Kingdom
Private Healthcare Provider	Controller	Private Healthcare Provider	United Kingdom
Insurance Provider	Controller	Insurance Provider	United Kingdom
Disclosure Scotland	Controller	Police Disclosure Service	United Kingdom
HR Cloud Software	Controller	Related Service Provider	United Kingdom
Financial Auditor	Controller	Financial Auditor	United Kingdom
SSAIB	Controller	Security Standards Body	United Kingdom
SIA	Controller	Security Standards Body	United Kingdom

Corporate Travel Provider	Controller	Travel and Hotel Provider	United Kingdom
Mobile Telecom Provider	Controller	Service Provider	United Kingdom

Where relevant, we confirm whether the country has an EC adequacy decision, else we make use of the model contracts made available by the EC. If the transfer is internal to our organisation, we ensure that we have Binding Corporate Rules in place.

3. Security Measures

We have carried out risk assessments in relation to our data security and organisational measures in accordance to Article 32 of the GDPR. We have implemented general IT security concepts that are appropriate with regard to the assessed risks.