



PRIVACY POLICY

1. The reason for this policy

- 1.1 Data protection law in the European Union is changing in 2018. The EU General Data Protection Regulation, the UK's Data Protection Act 2018, comes into force in May 2018, and later in the year a new EU Regulation relating to privacy in electronic communications is expected to come into force. For convenience we refer to this body of law as 'DP legislation'.
- 1.2 We expect to amend this policy as new legislation is passed, and as guidance is given so that the policy is as up to date as possible.
- 1.3 This privacy policy aims to inform our clients, supply chain and third parties how we will process their personal information. This policy should be read together with our terms of business and, where appropriate, our engagement letter. Where we have agreed specific terms in relation to data privacy issues with you, that specific agreement takes precedence over the general nature of this privacy policy.
- 1.4 We have a separate privacy policy for staff since the basis on which we process their personal data may be different.
- 1.5 By 'third parties' we mean:
 - 1.5.1 individuals who have no contract with us but whose data we are handling; and, where different;
 - 1.5.2 visitors to our website; or
 - 1.5.3 individuals who receive marketing information from us.

2. Who we are

sq-m2 Limited ('we', 'our', 'the company') is a data controller for the purposes of the DP legislation. We are registered with the UK Information Commissioner's Office with registration number Z2303249.

3. Your data privacy rights

- 3.1 Personal data is information which identifies a living person, whether directly or indirectly. A reference to 'you' and 'your' in this policy is to individuals whose personal data we are processing.
- 3.2 You have the right to access personal data that we hold for you and can find out more about your rights under the DP legislation at www.ico.org.uk

- 3.3 Your rights depend on the basis upon which we are processing your data and are difficult to summarise in a general document.
- 3.4 If you have any requests concerning your personal information or any queries with regard to our processing, please contact us at info@square-metre.com and your enquiry will be forwarded to the correct person. Alternatively, you can write to us at 3rd Floor, Boundary House, 7-17 Jewry Street, London, EC3N 2EX. We will respond to your enquiry within 30 days unless the query is complex. We will advise you if this is the case.
- 3.5 You will not have to pay a fee to access your personal information (or to exercise any other right as a data subject). However, we may charge a reasonable fee, if your request is clearly unfounded or excessive.
- 3.6 You have the right to lodge a complaint with the Information Commissioner in respect of our processing of your personal data. Further details are available at www.ico.org.uk.

4. How we collect personal data

- 4.1 We collect personal data in the course of our business from or about a number of different categories of people both directly and indirectly. This includes:
 - 4.1.1 where our clients and supply chain are individuals, those individuals; and
 - 4.1.2 people who work for them such as their customers;
 - 4.1.3 people with whom we, or our staff, have a business relationship e.g. when you give us a business card; or refer work to us and/or
 - 4.1.4 other third parties who visit our website, request information or receive marketing services (updates and events).

5. What we collect

- 5.1 We collect personal information which can include one or more of the following:
 - 5.1.1 basic information such as your name, title or position, and related information such as the company you work for;
 - 5.1.2 contact options e.g. phone, email or post;
 - 5.1.3 identification information collected as part of our client inception process;
 - 5.1.4 financial information such as payment related information;
 - 5.1.5 information to help us help you, inviting you to events of interest to you and, when you attend those events, information such as access or dietary requirements; and/or
 - 5.1.6 any other information relating to you from public sources and/or provided to us by you.
- 5.2 From time to time this information may include special category data (which the DP legislation requires us to treat with extra care). Special category data can include information about your

health, racial or ethnic origin, religious or political beliefs, trade union membership, sex life or sexual orientation.

- 5.3 Where personal information has been supplied to us indirectly, e.g. by a client, we respect any specific requirements they may make about our use of that data but will process the data as data controllers in our own right.

6. What we do with your information

- 6.1 We process personal information for the purpose of providing services to you or procuring your services and also for our own business purposes including:
- 6.1.1 to provide information requested by you;
 - 6.1.2 to tell you about our services including details of events, tenders, projects and publications (as permitted by you or by law);
 - 6.1.3 disclosures to our regulators, auditors, our own legal or professional advisors, our insurers and insurance brokers; and/or
 - 6.1.4 fraud prevention (including money laundering and bribery) and for the prevention or detection of crime (including use of CCTV on our premises);
 - 6.1.5 to provide our website and improve its use including monitoring and auditing;
 - 6.1.6 recruitment (further information can be found in Appendix 1).

7. What is the basis for processing your data?

- 7.1 We will only process your personal data where we have a lawful basis for doing so. This is set out in the DP legislation. The lawful basis will be one or more of the following, that the process is necessary for:
- 7.1.1 to perform a contract to which you are a party directly (or to which our client is a party) or taking steps prior to entering into such a contract;
 - 7.1.2 compliance with our legal and regulatory obligations;
 - 7.1.3 to pursue our legitimate business interests; and/or
 - 7.1.4 establishing, exercising or defending legal claims.

- 7.2 This policy can only be a general summary. You may at any time request to see and, if appropriate, amend, your personal data. Details are given under 'Your data privacy rights'.

8. Transfer of personal data

- 8.1 We do not transfer your personal data outside the European Economic Area (EEA). Whenever your personal data out of the EEA by us, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- 8.1.1 We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries;
- 8.1.2 Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries;
- 8.1.3 Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield;
- 8.1.4 Please contact us if you want further information on the specific mechanism used when transferring your personal data out of the EEA.

9. Marketing

At the foot of every marketing mailing we send out, we offer recipients the opportunity to opt out of any future mailings of that type, or indeed, request to be completely removed from our contacts database. The email also links to this privacy policy. You may also request to be removed from this database at any time by contacting info@square-metre.com, or writing to 3rd Floor, Boundary House, 7-17 Jewry Street, London, EC3N 2EX.

10. Events with third parties

On occasion we will host an event jointly with a third party. We will only release your details to that third party on the basis of them conducting a specific and singular mailing. They will be requested to sign a contract indicating their understanding of our privacy policy and their commitment to use your details in accordance with the principles of the Data Protection legislation and other applicable laws, and will be considered a data controller for the purpose of that particular mailing. You will have an opportunity to subscribe to further mailings from them or from us, or to unsubscribe as set out above.

11. Website

- 11.1 We are committed to safeguarding the privacy of visitors to our website.
- 11.2 You are not required to provide any personal information on the public areas of our website. However, you may choose to do so by completing the contact forms on various sections of our website. If you do, your personal information will be treated as set out in this policy.

12. Cookies

- 12.1 We use cookies on our website so that we can track how users navigate through our site, in order to enable us to evaluate and improve our site. We use this information to compile statistical data on the use of our website. Information obtained is used on an anonymous, aggregated basis and you cannot be identified from this.

12.2 To find out more about cookies and how we use them please read the detailed cookies policy in Appendix 2.

13. Other websites

Our website may contain links to other websites outside our control and which are not covered by this privacy policy. If you access other sites using the links provided, the operators of these sites may collect information from you which will be used by them in accordance with their privacy policy, which may differ from ours.

14. Security

We use up-to-date data storage and security techniques to protect your personal information from unauthorised access, improper use or disclosure, unauthorised modification or unlawful destruction or accidental loss. The company is undergoing accreditation with Cyber Essentials. Our employees and any third parties we engage to process personal information are required to respect its confidentiality.

15. Storage and disposal of personal data

15.1 We hold personal data and other information for different periods reflecting both good data protection practice and our regulatory, statutory and contractual requirements.

15.2 Personal data supplied for the purpose of due diligence checks is used only for that purpose and destroyed five years after the termination of the business relationship between us.

16. Changes to this policy

We reserve the right to update this privacy policy at any time. The most up to date version will be available on our website.

Signed:

Date: 31st October 2018



Steve Hart
Director

APPENDIX 1 – PRIVACY NOTICE FOR CANDIDATE

1. What is the purpose of this document?

sq-m2 Limited is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. You are being sent a copy of this privacy notice because you are applying for work with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under DP legislation.

2. Data protection principles

2.1 We will comply with data protection law and principles, which means that your data will be:

- 2.1.1 Used lawfully, fairly and in a transparent way;
- 2.1.2 Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- 2.1.3 Relevant to the purposes we have told you about and limited only to those purposes;
- 2.1.4 Accurate and kept up to date;
- 2.1.5 Kept only as long as necessary for the purposes we have told you about.
- 2.1.6 Kept securely.

3. The kind of information we hold about you

3.1 In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- 3.1.1 The information you have provided to us in your curriculum vitae and covering letter;
- 3.1.2 Any information you provide to us during an interview;
- 3.1.3 References from previous employers who you have given us permission to contact.

3.2 We may also collect, store and use the following "special categories" of more sensitive personal information:

- 3.2.1 Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions;
- 3.2.2 Information about your health, including any medical condition, health and sickness records;
- 3.2.3 Information about criminal convictions and offences.

4. How is your personal information collected?

4.1 We collect personal information about candidates from the following sources:

- 4.1.1 You, the candidate.
- 4.1.2 Your recruitment agency;
- 4.1.3 Disclosure and Barring Service in respect of criminal convictions;
- 4.1.4 Your named referees;
- 4.1.5 Third parties, namely from a publicly accessible source i.e. social media.

5. How we will use information about you

5.1 We will use the personal information we collect about you to:

- 5.1.1 Assess your skills, qualifications, and suitability for the role;
- 5.1.2 Carry out background and reference checks, where applicable;
- 5.1.3 Communicate with you about the recruitment process;
- 5.1.4 Keep records related to our hiring processes;
- 5.1.5 Comply with legal or regulatory requirements.

5.2 It is in our legitimate interests to decide whether to appoint you to work since it would be beneficial to our business to appoint someone to that role.

5.3 We also need to process your personal information to decide whether to enter into a contract of employment with you.

5.4 Having received your CV and covering letter, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we will then take up references and/or carry out a criminal record and/or carry out any other check before confirming your appointment.

6. If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

7. How we use particularly sensitive personal information (if asked for)

7.1 We will use your particularly sensitive personal information in the following ways:

7.1.1 We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during an interview.

7.1.2 We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

8. Information about criminal convictions

8.1 We may collect information about your criminal convictions history if we would like to offer you the role (conditional on checks and any other conditions, such as references, being satisfactory). We are entitled] to carry out a criminal record check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role.

8.2 We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

9. Data sharing

We will only share your personal information with third parties for the purposes of processing your application, for example to carry out a background check. 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.

10. Data security

10.1 We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality

10.2 We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

11. Data retention

11.1 We will retain your personal information for a period of 12 months after we have communicated to you our decision about whether to appoint you to role. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with applicable laws and regulations.

- 11.2 If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

12. Your rights in connection with personal information

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

- 12.1.1 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;
- 12.1.2 Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected;
- 12.1.3 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);
- 12.1.4 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 particular 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;
- 12.1.5 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;
- 12.1.6 Request the transfer of your personal information to another party.

12.2 If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact us in writing at 3rd Floor Boundary House, 7-17 Jewry Street, London, EC3N 2EX FAO Data Protection Officer.

13. Right to withdraw consent

When you applied for this role, you provided consent to us processing your personal information for the purposes of the recruitment exercise. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact us in writing at 3rd Floor Boundary House, 7-17 Jewry Street, London, EC3N 2EX FAO Data Protection Officer. Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.

14. Data protection officer

We have appointed a data protection officer to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the data protection officer. 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.

I, _____ (candidate name), acknowledge that on _____ (date), I received a copy of sq-m2 Limited's Candidate Privacy Notice and that I have read and understood it.

Signature

.....

Name

.....

APPENDIX 2 – COOKIES POLICY

1. What is a cookie?

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

2. How cookies work

- 2.1 A website's cookies store information on your computer or mobile device, which is sent back to that website each time you visit. Sometimes this information is essential to access a website's functions – for example if you need to log in, a cookie will allow the website to recognise your log-in details.
- 2.2 Cookies can also be used to build a profile of your activity on a website – which pages you visit, how long you spend on each page. A website may then use this information to tailor the pages that you see when you visit the site in the future.

3. How we use cookies

- 3.1 We use cookies for two purposes:
 - 3.1.1 To track your 'session state' so that when you interact with our website it is able to retrieve data that is specific to you;
 - 3.1.2 To create statistical data about how our visitors find and use our website. This allows us to improve the performance of the website. The information we collect is anonymous, it cannot be used to identify you personally.
- 3.2 All information collected will be processed fully in accordance with DP legislation.

4. Embedded content from other websites

Articles on this site may include embedded content (e.g. videos, images, articles etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website. These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged into that website.

5. How to control or delete cookies

- 5.1 All recent versions of popular browsers (such as Internet Explorer, Google Chrome or Mozilla Firefox) allow you to control cookies. You can set your browser to accept or reject all, or certain cookies. You might, for example, be happy to accept a cookie that allows you to log in to a website but prefer to reject any which are used to build a profile of your internet usage. You can also set your browser to prompt you each time a cookie is offered.

- 5.2 For more information, you may wish to visit www.aboutcookies.org which contains comprehensive information on how to do this on a wide variety of browsers. You will also find details on how to delete cookies from your computer as well as more general information about cookies. For information on how to do this on the browser of your mobile device, you will need to refer to your handset manual.
- 5.3 Please note that if you restrict or delete cookies used by this website then it may not function as intended.