

Our Reference: AXAMS-413166331-235

01/12/2022

PRIVACY NOTICE AND DATA PROTECTION POLICY

Overview

AXIAH Ltd collects personal data during the conduct of our business which relate to natural persons who can be identified or who are identifiable directly from the information in question or who can be indirectly identified from that information in combination with other information.

This policy sets out why we use personal data, how we will use personal data and how we will process any personal data ensuring that we comply with Data Protection legislation. This policy covers all staff, potential staff, referees, visitors / contractors, customers, potential customers, partners, potential partners, and may also be relevant to members of the general public.

AXIAH is the data controller for the personal data detailed within Table 1, which may include imagery and/or video surveillance; we do not process on behalf of other controllers or to countries outside of the European Economic Area.

The Director of AXIAH Ltd has overall responsibility for ensuring compliance with Data Protection legislation and the effective operation of data protection policies. To ensure the implementation of this policy the company has designated the Operations Co-Ordinator as the company's data protection controller.

Subject Access Requests and other enquiries

We request that all Subject Access Requests are securely submitted at <https://SAR.AXIAH.co.uk>. This makes it easier and quicker for us to deal for your request. Alternatively, the below contact details may be used for any enquiries or to submit a Subject Access Request. If you make a request, we have one month to respond to you.

By submitting a Subject Access Request, you declare that all information is correct, give us permission to use your personal information for the purpose of identification and completion of the request, and consent to receive requests for additional information including verification of identity. If submitted a request on behalf of a third party, we will require proof that you are permitted to act on their behalf.

Address	AXIAH Ltd, PO Box 4329, Chippenham, SN15 9NL
Email	Info@AXIAH.co.uk
Telephone	+44 (0) 800 0246 222

You can also complain to the ICO if you are unhappy with how we have used your data.

Address	Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
Website	https://ico.org.uk/make-a-complaint/
Telephone	0303 123 1113

Subject Rights

Any personal information held by AXIAH Ltd which could identify individuals will be considered Personal Data under applicable Data Protection legislation. Under Data Protection legislation, Data Subjects have certain rights in relation to Personal Data concerning them. This may include:

- the right to know how the data is being processed
- the right to access a copy of that Personal Data
- the right to request any inaccurate Personal Data is rectified, including having incomplete Personal Data completed
- the right to request Personal Data is erased without undue delay, where it is no longer necessary to retain it in relation to the purposes it was collected
- the right to request restriction of processing of Personal Data in certain circumstances;
- the right to lodge a complaint with the Information Commissioner's Office, if the Data Subject considers that processing of the Personal Data infringes Data Protection legislation.

Security Measures

It is a legal requirement for AXIAH Ltd to comply with the general data protection regulations. It is also company policy to ensure that every employee maintains the confidentiality of any personal data held by the company in whatever form.

AXIAH Ltd needs to keep certain information about its employees, customers and suppliers for financial and commercial reasons and to enable us to monitor performance, to ensure legal compliance, and for health and safety purposes. To comply with the law, information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully. This means that we must comply with the Data Protection Principles set out in the UK GDPR. These principles require that personal data must be:

- Obtained fairly and lawfully and shall not be processed unless certain conditions are met
- Obtained for specified and lawful purpose and not processed further in a manner incompatible with that purpose
- Adequate, relevant and not excessive
- Accurate and up to date
- Kept for no longer than necessary
- Processed in accordance with data subjects' rights
- Protected by appropriate security
- Not transferred to a country outside the EU without adequate protection

In processing or using any personal information we must ensure that we follow these principles at all times.

All personal data that the company holds is securely stored within the company's information systems known as 'CALYPSO', 'KAMPE' and 'SOTERIA'. Only authorised members of staff can access information on the need-to-know basis. AXIAH comply with Cyber Essential Plus to ensure all information systems are secure.

Storage and handling of all AXIAH assets are designed to meet His Majesties Government's published security outcomes for the OFFICIAL classification including, where applicable, additional controls for OFFICIAL-SENSITIVE.

Where imagery and/or video surveillance is controlled, these are placed to minimise intrusion, appropriate signage is displayed, and recording is limited according to the declared purpose. Note that surveillance systems have been selected which do not have the ability to capture audio, in accordance with the Data Protection Impact Assessment conducted.

Personal Data

Process	Purpose	Subject	Recipients	Art 6 lawful basis	Art 9 condition	Subject Rights	Retention	Data Breach
Human Resources	Payroll	Staff	Sage	(b) Contract	N/A	Erasure and Portability	10 years	N/A
Human Resources	Payroll	Staff	HMRC	(c) Legal obligation	N/A	N/A	10 years	N/A
Human Resources	Personnel File	Staff	Referees	(a) Consent (b) Contract	(b) employment	N/A	10 years	N/A
Human Resources	Personnel File	Staff	UKSV / IPSA	(a) Consent (b) Contract (e) Public task	(b) employment (g) Reasons of substantial public interest	N/A	10 years	N/A
Human Resources	Personnel File	Referees	UKSV / IPSA	(a) Consent (e) Public task	N/A	Withdrawal	10 years	N/A
Human Resources	Recruitment	Potential Staff	Referees	(a) Consent (b) Contract	(b) employment	N/A	2 years	N/A
Human Resources	Recruitment	Potential Staff	UKSV / IPSA	(a) Consent (b) Contract (e) Public task	(b) employment (g) Reasons of substantial public interest	N/A	2 years	N/A
Human Resources	Recruitment	Referees	UKSV / IPSA	(a) Consent (e) Public task	N/A	Withdrawal	2 years	N/A
Asset Management	Prevention / Detection / Deterrence / Prosecution	Staff	Law Enforcement Agencies	(f) Legitimate interests	N/A	Erasure and Objection	6 months	N/A
Asset Management	Prevention / Detection / Deterrence / Prosecution	Visitors / Contractors	Law Enforcement Agencies	(f) Legitimate interests	N/A	Erasure and Objection	6 months	N/A
Asset Management	Prevention / Detection / Deterrence / Prosecution	General Public	Law Enforcement Agencies	(f) Legitimate interests	N/A	Erasure and Objection	6 months	N/A

Process	Purpose	Subject	Recipients	Art 6 lawful basis	Art 9 condition	Subject Rights	Retention	Data Breach
Supply	Business Development	Customers	Partners	(a) Consent (f) Legitimate interests	N/A	Erasure and Objection / withdrawal	10 years	N/A
Supply	Business Development	Potential Customers	Partners	(a) Consent (f) Legitimate interests	N/A	Erasure and Objection / withdrawal	2 years	N/A
Purchasing	Business Development	Suppliers	Partners	(a) Consent (f) Legitimate interests	N/A	Erasure and Objection / withdrawal	10 years	N/A
Purchasing	Business Development	Potential Suppliers	Partners	(a) Consent (f) Legitimate interests	N/A	Erasure and Objection / withdrawal	2 years	N/A
Portfolio Management	Community Relations	Partners	Partners	(a) Consent (f) Legitimate interests	N/A	Erasure and Objection / withdrawal	10 years	N/A
Portfolio Management	Community Relations	Potential Partners	Partners	(a) Consent (f) Legitimate interests	N/A	Erasure and Objection / withdrawal	2 years	N/A

Table 1 Controlled Personal Data