

Fair Processing Notice

HIERON London is committed to protecting and respecting your privacy.

This policy sets out the basis on which any Personal Data we collect throughout our relationship with you, will be processed by us. Some of the data we collect is in the Special Categories of Personal Data. Please read this privacy notice carefully to understand your rights and our views and practices regarding your Personal Data. For the majority of individuals, the data controller responsible for processing your Personal Data is HIERON London Ltd of Kingfisher House, 21-23 Elmfield Road, Bromley, BR1 1LT. If you have any queries in respect of your Personal Data, please contact the Data Protection Compliance Manager ('DPCM') at info@hieron.london. This policy is overseen by the DPCM. If you have any queries, complaints or requests please contact the DPCM at info@hieron.london or 0208315 7570

This notice was last changed on 30 January 2023.

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Update: Covid-19

In order to protect the safety of our workforce, we may be required to collect your Personal Data for purposes related to our Covid-19 response. That may include information about your health including your vaccination status and information about the vaccine that you have received, whether or not you have or have had Covid-19, whether or not you are displaying Covid-19 symptoms, your medical status (e.g. your "shield" status as set out by the government) and results from Covid-19 tests, including tests that we conduct at our offices and on our sites. We may also be required to collect Personal Data relating to individuals within your household or individuals that you have been in contact with who have Covid-19 or are displaying Covid-19 symptoms, in particular where that requires you to

self-isolate at home. This information will allow us to make decisions about whether individuals can continue to work at our offices and on our sites and about any steps we need to put in place to protect the safety of our workforce. We will collect this information where we are legally allowed to do so and in accordance with this privacy policy.

What information do we collect from you?

We will collect and process the following data about you:

- Information you give us. This is information about you that you give us directly. You may do this by filling in forms on our website or by corresponding with us by phone, email or otherwise. Information you send to us may be stored and processed by HIERON London. This will include any emails or other electronic messages and any documents, photos or other files stored on or processed through our systems or devices. Please be aware that by

entering information onto these systems you are sharing that information with HIERON London.

- Information we collect throughout our relationship. We will collect information throughout your time with us. This may include information about location, employees, projects, working hours and other relevant information.
- The type of information we collect. This may include, but is not limited to the following (and may include Special Categories of Personal Data as defined below)
 - Identification information - name, title.
 - Contact details - address, telephone number, mobile telephone number, email address.
 - Employment related information - job title, company, business contact information, CV and employment application.
 - Browsing behaviour - When you visit our site we may collect information about your online browsing behaviour and any devices you have used to access our site (including your IP address, browser type and mobile device identifiers).
 - Location - We may collect your location data through your IP address.
 - Preferences - We collect what HIERON London services you are interested in and the sectors that you wish to be updated on through our preference centre.
 - Dietary requirements - In some cases, such as for attendance at catered events, we may collect and process special dietary requirements for reasons of health or religion.
 - Information about your health – In some cases, we may collect information which is categorised as health data such as in respect of accessibility to buildings or accessibility to documents and other materials.
 - Equality and Diversity – You may choose to share information about your ethnicity, sexuality or beliefs with us for inclusion purposes. This information will be treated as highly confidential.
 - Images and video footage – Images and footage are collected from our use of CCTV and similar technologies at our offices and/ or sites. Footage may also be collected via drones, body worn cameras, headcams and webcams when you visit one of our sites. In some instances, this will include audio footage.
 - Other data which we may notify you of from time to time.
 - Opinion – HIERON London may also contact you to ask you to take part in voluntary surveys to hear your opinion of current services or of potential new services on offer. If you choose to take part in these surveys, we will collect the information you provide. We also collect data you provide in emails and phone calls for example, your questions to customer support.

Why do we collect this information?

We use this information in the following ways: Information you give to us and that we collect. We process your Personal Data for the following reasons: Based on our legitimate interest to:

- inform you of our services through email, mail, telephone, or SMS text message;
- send you information on promotional content (you can amend your marketing preferences in our preference centre);
- remember you when you visit our website and see how you journey through it by using cookies;
- remember you when you use our forms to download content or sign up for a newsletter;

- supply, improve and support the services we provide;
 - keep our site and systems safe and secure;
 - ensuring and protecting the health and safety of our workforce;
 - managing our response to the Covid-19 pandemic;
 - understand our customer base and purchasing trends;
 - defend against or exercise legal claims and investigate complaints;
 - ensure that our recruitment practices are fair and inclusive and that we are recruiting a diverse workforce; and
 - understand the effectiveness of our marketing.
- Based on performance of our contract with you, or in order to take steps at your request to enter into a contract with you, for example:
- When applying for a vacancy advertised on our website; or
 - In performing our obligations under our contract to which you are a party.
- Pursuant to our legal obligations:
- the provision of products and services;
 - data protection;
 - health and safety;
 - anti-money laundering;
 - fraud investigations;
 - assisting law enforcement; and
- any other legal obligations placed on us from time to time. We may also process data on the basis of your consent or explicit consent.
- Where we rely on your consent for processing this will be brought to your attention when the information is collected from you.

We may inform you of additional purposes for processing your information when that information is collected from you.

Information we receive from other sources. See the 'Who might we share your information with?' section below for details of how we use information in conjunction with third parties.

We may inform you of additional purposes for processing your information when that information is collected from you.

How long do we keep hold of your information?

We only store your information for as long as is required for the purpose it was collected. Should you wish to have more information about how long we retain your data, please contact our DPCM at: info@hieron.london or 0208315 7570

Information stored generally on IT systems, such as email history, will be deleted regularly in line with our policies.

Automated decision making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

1. Where we have notified you of the decision and given you 21 days to request a reconsideration.
2. Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.
3. In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

Who might we share your information with?

Where information is shared with third parties we will only share the information required for the purpose it is being shared.

For the purposes set out in the 'Why do we collect this information?' section above, we have the right to share your personal information with:

- We use a third party provider, Hootsuite to manage our social media interactions. If you send us a private or direct message via social media the message will be stored by Hootsuite. It will not be shared with any other organisations.
- Our clients.
- Our suppliers and sub-contractors and the suppliers and sub-contractors of our clients where required including our Covid-19 testing providers.

Additionally, we will disclose your personal information to the relevant third party:

- In the event that we sell or buy any business or assets, in which case we will disclose your Personal Data to the prospective seller or buyer of such business or assets.
- To third parties when it is necessary for the establishment, exercise or defence of legal claims.
- If we are acquired by a third party, in which case Personal Data held by it about its customers will be one of the transferred assets.
- If we choose to exercise a legal power to do so.
- If we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation, or in order to enforce or apply contractual terms or other agreements; or to protect the rights, property, or safety of ourselves our customers, our regulator, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and prevention of money laundering and credit risk reduction.

How your data is stored and kept secure?

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. Details of these measures may be obtained from the DPCM.

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.

What are your rights?

You have the following rights. You can exercise these rights at any time by contacting the DPCM. You can make a subject access request verbally or in writing. In order to deal with your request effectively, it would be helpful if you could contact the DPCM in the first instance. The DPCM may be contacted in the following ways:

By post:

DPCM (Legal Department), HIERON London Ltd, Kingfisher House, 21-23 Elmfield Road, Bromley, BR1 1LT.

By email:

info@hieron.london

By telephone:

+44 (0)2083157570

You have the right:

- to ask us not to process your Personal Data for marketing purposes;
- to ask us not to process your Personal Data where it is processed on the basis of legitimate interests provided that there are no compelling reasons for that processing;
- where processing of your Personal Data is based on consent, to withdraw that consent at any time.
- to request from us access to personal information held about you;
- to ask for the information we hold about you to be rectified if it is inaccurate or incomplete;
- to ask for data to be erased provided that the Personal Data is no longer necessary for the purposes for which it was collected, you withdraw consent (if the legal basis for processing is consent), you exercise your right to object, set out below, and there are no overriding legitimate ground for processing, the data is unlawfully processed, the data needs to be erased to comply with a legal obligation;
- to ask for the processing of that information to be restricted if the accuracy of that data is contested, the processing is unlawful, the Personal Data is no longer necessary for the purposes for which it was collected or you exercise your right to object (pending verification of whether there are legitimate grounds for processing); or
- to ask for data portability if the processing is carried out by automated means and the legal basis for processing is consent or contract.
- Should you have any issues, concerns or problems in relation to your data, or wish to notify us of data which is inaccurate, please let us know by contacting us using the contact details above. In the event that you are not satisfied with our processing of your Personal Data, you have the right to lodge a complaint with the relevant supervisory authority at any time. The relevant supervisory authority in the UK is the Information Commissioner's Office (ICO). The ICO's contact details are available here: <https://ico.org.uk/concerns/>

What we ask of you

- Keeping your information accurate and up to date. If your information changes for any reason, for example if you change your name, address, then you should inform us of the change as soon as possible so that we can ensure your information is kept accurate and up to date.
- Business cards. If you issue business cards to us your data will be processed by those who you share the business cards with. It is reasonably expected that the data will only be processed by those you share it with for business purposes, principally, to contact you in relation to your role and your business.

Definitions

EU GDPR: Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing directive 95/46/EC as updated, superseded or repealed from time to time.

UK GDPR: The retained EU law version of the General Data Protection Regulation ((EU) 2016/679) as it forms part of the law of England and Wales, Scotland and Northern Ireland by virtue of

section 3 of the European Union (Withdrawal) Act 2018, as modified by Schedule 1 to the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019, as updated, superseded or repealed from the time to time.

Personal Data: Any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier, such identifiers including name, location data or online identifier.

Special Categories of Data includes data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as the processing of genetic

data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

Changes to our privacy policy

This policy may be updated from time to time. Please check this page on our website for any changes.

Contact us

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to: DPCM (Legal Department), HIERON London Ltd, Kingfisher House, 21-23 Elmfield Road, Bromley BR1 1LT or email info@hieron.london or you can call us on +44 (0)2083157570

Cookies

We use cookies and similar technology to distinguish you from other users of our site. This helps us to provide you with a good experience when you use our site and also allows us to improve our site.

Cookies are small files stored on your computer. They are downloaded by your internet browser and designed to store information so your computer or the website can use them to find out things like whether you've been to the site before, or if you're logged in.

We use the following cookies for the following purposes:

- Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website.
- Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- Functionality cookies. These are used to recognise you when you return to our website. This enables us to personalise our content for you and remember your preferences.
- Targeting cookies. These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website more relevant to your interests.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

To find out more information about cookies and how to manage them, <http://www.allaboutcookies.org/cookies/> is a site produced by the Interactive Advertising Bureau (IAB), an industry body.

Modern browsers will allow you to disable cookies per site using their options/preferences settings