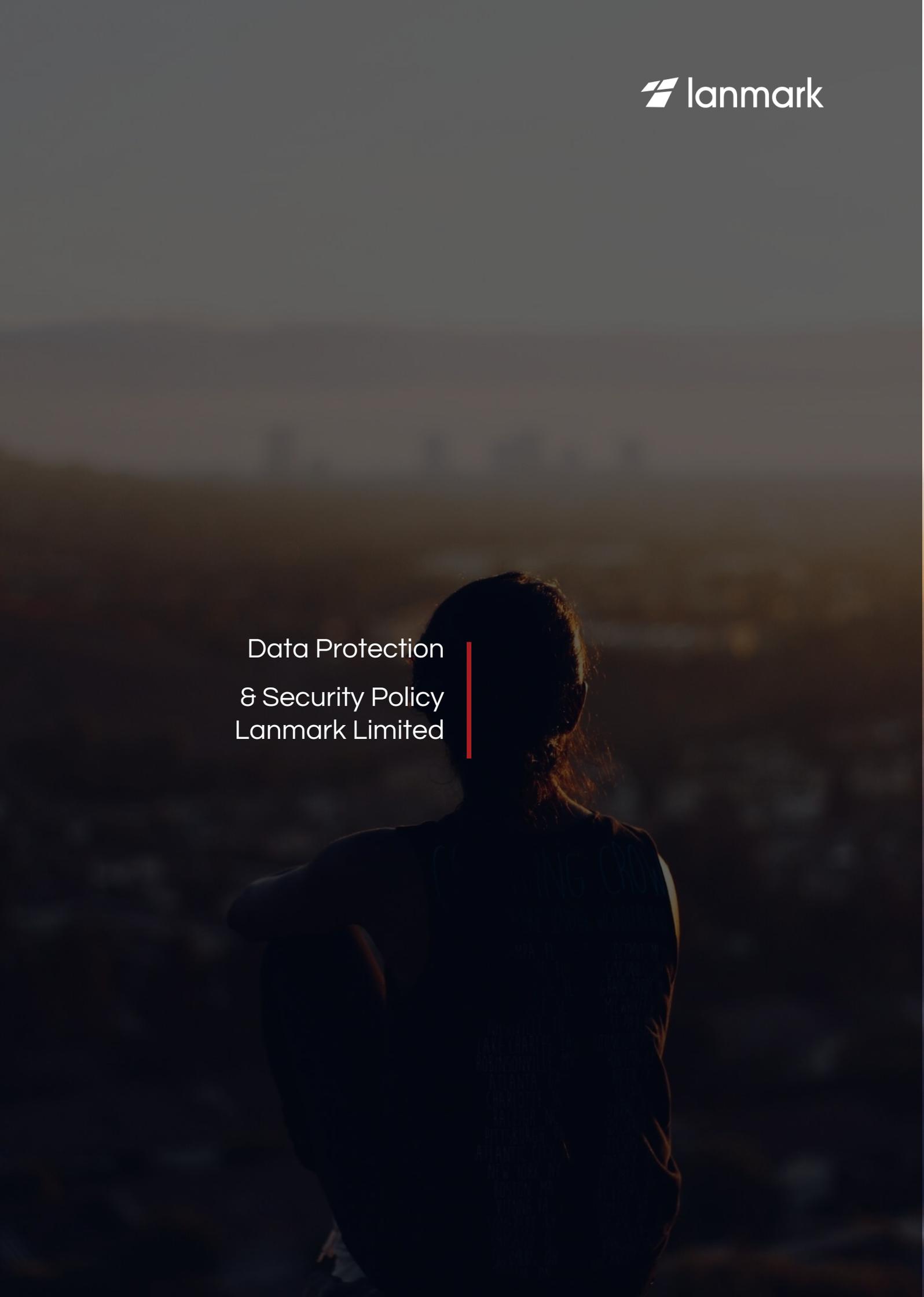


Data Protection
& Security Policy
Lanmark Limited



Statement of policy and purpose of Policy

Security goals

Lanmark is committed to safeguard the confidentiality, integrity and availability of all physical and electronic information assets of the institution to ensure that regulatory, operational and contractual requirements are fulfilled. The overall goals for information security at Lanmark are the following:

- Ensure compliance with current laws, regulations and guidelines.
- Comply with requirements for confidentiality, integrity and availability for Lanmark's employees, students and other users.
- Establish controls for protecting Lanmark's information and information systems against theft, abuse and other forms of harm and loss.
- Motivate administrators and employees to maintain the responsibility for, ownership of and knowledge about information security, in order to minimize the risk of security incidents.
- Ensure that Lanmark is capable of continuing their services even if major security incidents occur.
- Ensure the protection of personal data (privacy).
- Ensure the availability and reliability of the network infrastructure and the services supplied and operated by Lanmark.
- Comply with methods from international standards for information security, e.g. ISO/IEC 27001.
- Ensure that external service providers comply with Lanmark's information security needs and requirements.

Security strategy

Lanmark's current business strategy and framework for risk management are the guidelines for identifying, assessing, evaluating and controlling information related risks through establishing and maintaining the information security policy (this document).

It has been decided that information security is to be ensured by the policy for information security. In order to secure operations at Lanmark even after serious incidents, Lanmark shall ensure the availability of continuity plans, backup procedures, defence against damaging code and malicious activities, system and information access control, incident management and reporting.

The term information security is related to the following basic concepts:

- Confidentiality:
The property that information is not made available or disclosed to unauthorized individuals, entities, or processes.
- Integrity:
The property of safeguarding the accuracy and completeness of assets.
- Availability:
The property of being accessible and usable upon demand by an authorized entity.

Some of the most critical aspects supporting Lanmark's activities are availability and reliability for network, infrastructure and services. Lanmark practices openness and principles of public disclosure, but will in certain situations prioritize confidentiality over availability and integrity.

Every user of Lanmark's information systems shall comply with this information security policy. Violation of this policy and of relevant security requirements will therefore constitute a breach of trust between the user and Lanmark, and may have consequences for employment or contractual relationships.

Section A: Overview

1. The reason for this policy

- 1.1 You have legal rights with regard to the way your personal data is handled.
- 1.2 In the course of our business activities we collect, store and process personal data about our customers, suppliers and other third parties, and therefore in order to comply with the law and to maintain confidence in our business, we acknowledge the importance of correct and lawful treatment of this data.
- 1.3 All people working in or with our business are obliged to comply with this policy when processing personal data.

2. Introduction

- 2.1 This policy and any other documents referred to in it sets out the basis on which we will process any personal data we collect from data subjects, for example, customers and business contacts, or that is provided to us by data subjects or other sources.
- 2.2 It also sets out our obligations in relation to data protection under the General Data Protection Regulation (“the **Regulation**”).
- 2.3 This policy sets out rules on data protection and the legal conditions that must be satisfied when we obtain, handle, process, transfer and store personal data.
- 2.4 The procedures and principles set out herein must be followed at all times by us and our employees, agents, contractors, or other parties working on behalf of Lanmark.
- 2.5 We aim to ensure the correct, lawful, and fair handling of your personal data and to respect your legal rights.

3. The meaning of key Data Protection terms

- 3.1 **Data** is information which is stored electronically, on a computer, or in certain paper-based filing systems.
- 3.2 **Data subjects** for the purpose of this policy include all living individuals about whom we holds personal data. A data subject need not be a UK national or resident. All data subjects have legal rights in relation to their personal information.
- 3.3 **Personal data** means data relating to a living individual who can be identified from that data (or from that data and other information in our possession). Personal data can be factual (for example, a name, address or date of birth) or it can be an opinion about that person, their actions and behaviour.
- 3.4 **Data controllers** are the people who or organisations which determine the purposes for which, and the manner in which, any personal data is processed. They are responsible for establishing practices and policies in line with the Act. We are the data controller of all personal data used in our business for our own commercial purposes.
- 3.5 **Processing** is any activity that involves use of the data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring personal data to third parties.

4. Summary of the Data Protection Principles

This Policy aims to ensure compliance with the Regulation. The Regulation sets out the following principles with which any party handling personal data must comply. All personal data must be:

- a) **(Processed fairly and lawfully)** processed lawfully, fairly, and in a transparent manner in relation to the data subject;
- b) **(Processed for limited purposes and in an appropriate way)** collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c) **(Adequate, relevant and not excessive for the purpose)** adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed;
- d) **(Accurate)** accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which they are processed, is erased or rectified without delay;
- e) **(Not kept longer than necessary for the purpose)** kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the Regulation in order to safeguard the rights and freedoms of the data subject;
- f) **(Processing in line with data subject's rights)** personal data must be processed in line with data subjects' rights, in particular your right to:
 - 4.1.1 request access to any data held about them by a Data Controller (see also clause 15).
 - 4.1.2 prevent the processing of their data for direct-marketing purposes.
 - 4.1.3 ask to have inaccurate data amended (see also clause 9).
 - 4.1.4 prevent processing that is likely to cause damage or distress to themselves or anyone else.
- g) **(Security)** processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
- h) **(Transfers outside EEA)** not transferred to people or organisations situated in countries without adequate protection.

5. Our use of personal data and our purpose

We collect, hold, and process the personal data referred to in Schedule 1 (and the purpose for which we process that personal data is also set out in Schedule 1).

6. Our data protection measures

When we are working with personal data we take the measures set out in Schedule 2.

Section B: Data Protection Principles

7. Lawful, Fair, and Transparent Data Processing

The Regulation is not intended to prevent the processing of personal data, but to ensure that it is done fairly and without adversely affecting the rights of the data subject. The processing of personal data is lawful if one (or more) of the following applies:

- a) **(consent)** the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- b) **(contract)** processing is necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract;
- c) **(legal obligation)** processing is necessary for compliance with a legal obligation to which the Data Controller is subject;
- d) **(protection)** processing is necessary to protect the vital interests of the data subject or of another natural person;
- e) **(public interest)** processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller;
- f) **(legitimate interests)** processing is necessary for the purposes of the legitimate interests pursued by the Data Controller or by a third party, except where such interests are overridden by the fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

8. Processed for Specified, Explicit and Legitimate Purposes

8.1 Lanmark collects and processes the personal data set out in Schedule 1 of this Policy. This may include personal data received directly from data subjects (for example, contact details used when a data subject communicates with us) and can include data received from third parties.

8.2 Lanmark only processes personal data for the specific purposes set out in Schedule 1 of this Policy (or for other purposes expressly permitted by the Regulation). The purposes for which we process personal data will be informed to data subjects at the time that their personal data is collected, where it is collected directly from them, or as soon as possible (not more than one calendar month) after collection where it is obtained from a third party.

9. Adequate, Relevant and Limited Data Processing

Lanmark will only collect and process personal data for and to the extent necessary for the specific purpose(s) informed to data subjects as under Part 5, above.

10. Accuracy of Data and Keeping Data Up To Date

Lanmark shall ensure that all personal data collected and processed is kept accurate and up-to-date. The accuracy of data shall be checked when it is collected and at regular intervals thereafter. Where any inaccurate or out-of-date data is found, all reasonable steps will be taken without delay to amend or erase that data, as appropriate.

11. Timely Processing

Lanmark shall not keep personal data for any longer than is necessary in light of the purposes for which that data was originally collected and processed. When the data is no longer required, all reasonable steps will be taken to erase it without delay.

12. **Secure Processing**

Lanmark shall ensure that all personal data collected and processed is kept secure and protected against unauthorised or unlawful processing and against accidental loss, destruction or damage. Further details of the data protection and organisational measures which shall be taken are provided in Parts 22 and 23 of this Policy.

12.1 An assessment of the risks posed to individual data subjects; and

12.2 Details of the measures in place to minimise and handle risks including safeguards, data security, and other measures and mechanisms to ensure the protection of personal data, sufficient to demonstrate compliance with the Regulation.

Section C: Data Subject Rights

13. The Rights of Data Subjects

The Regulation sets out the following rights applicable to data subjects:

- a) The right to be informed;
- b) The right of access;
- c) The right to rectification;
- d) The right to erasure (also known as the 'right to be forgotten');
- e) The right to restrict processing;
- f) The right to data portability;
- g) The right to object;
- h) Rights with respect to automated decision-making and profiling.

14. Keeping Data Subjects Informed

14.1 Lanmark shall ensure that the following information is provided to every data subject when personal data is collected:

- a) Details of Lanmark including, but not limited to, the identity of Mark Brown, its Data Protection Officer;
- b) The purpose(s) for which the personal data is being collected and will be processed (as detailed in Schedule 1 of this Policy) and the legal basis justifying that collection and processing;
- c) Where applicable, the legitimate interests upon which Lanmark is justifying its collection and processing of the personal data;
- d) Where the personal data is not obtained directly from the data subject, the categories of personal data collected and processed;
- e) Where the personal data is to be transferred to one or more third parties, details of those parties;
- f) Where the personal data is to be transferred to a third party that is located outside of the European Economic Area (the "EEA"), details of that transfer, including but not limited to the safeguards in place (see Part 26 of this Policy for further details concerning such third country data transfers);
- g) Details of the length of time the personal data will be held by Lanmark (or, where there is no predetermined period, details of how that length of time will be determined);
- h) Details of the data subject's rights under the Regulation;
- i) Details of the data subject's right to withdraw their consent to Lanmark's processing of their personal data at any time;
- j) Details of the data subject's right to complain to the Information Commissioner's Office (the 'supervisory authority' under the Regulation);
- k) Where applicable, details of any legal or contractual requirement or obligation necessitating the collection and processing of the personal data and details of any consequences of failing to provide it;
- l) Details of any automated decision-making that will take place using the personal data (including but not limited to profiling), including information on how decisions will be made, the significance of those decisions and any consequences.

14.2 The information set out above in Part 14.1 shall be provided to the data subject at the following applicable time:

- 14.2.1 Where the personal data is obtained from the data subject directly, at the time of collection;
- 14.2.2 Where the personal data is not obtained from the data subject directly (i.e. from another party):

- a) If the personal data is used to communicate with the data subject, at the time of the first communication; or
- b) If the personal data is to be disclosed to another party, before the personal data is disclosed; or
- c) In any event, not more than one month after the time at which Lanmark obtains the personal data.

15. Data Subject Access

- 15.1 A data subject may make a subject access request (“SAR”) at any time to find out more about the personal data which Lanmark holds about them. Lanmark is normally required to respond to SARs within one month of receipt (this can be extended by up to two months in the case of complex and/or numerous requests, and in such cases the data subject shall be informed of the need for the extension).
- 15.2 All subject access requests received must be forwarded to Mark Brown, Lanmark’s data protection officer. Email: mark.brown@lanmark.com, Letter: Roxby House, 20-22 Station Road, Sidcup, DA15 7EJ.
- 15.3 Lanmark does not charge a fee for the handling of normal SARs. Lanmark reserves the right to charge reasonable fees for additional copies of information that has already been supplied to a data subject, and for requests that are manifestly unfounded or excessive, particularly where such requests are repetitive.

16. Rectification of Personal Data

- 16.1 If a data subject informs Lanmark that personal data held by Lanmark is inaccurate or incomplete, requesting that it be rectified, the personal data in question shall be rectified, and the data subject informed of that rectification, within one month of receipt the data subject’s notice (this can be extended by up to two months in the case of complex requests, and in such cases the data subject shall be informed of the need for the extension).
- 16.2 In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of any rectification of that personal data.

17. Erasure of Personal Data

- 17.1 Data subjects may request that Lanmark erases the personal data it holds about them in the following circumstances:
 - a) It is no longer necessary for Lanmark to hold that personal data with respect to the purpose for which it was originally collected or processed;
 - b) The data subject wishes to withdraw their consent to Lanmark holding and processing their personal data;
 - c) The data subject objects to Lanmark holding and processing their personal data (and there is no overriding legitimate interest to allow Lanmark to continue doing so) (see Part 20 of this Policy for further details concerning data subjects’ rights to object);
 - d) The personal data has been processed unlawfully;
 - e) The personal data needs to be erased in order for Lanmark to comply with a particular legal obligation
- 17.2 Unless Lanmark has reasonable grounds to refuse to erase personal data, all requests for erasure shall be complied with, and the data subject informed of the erasure, within one month of receipt of the data subject’s request (this can be extended by up to two months in the case of complex requests, and in such cases the data subject shall be informed of the need for the extension).
- 17.3 In the event that any personal data that is to be erased in response to a data subject request has been disclosed to third parties, those parties shall be informed of the erasure (unless it is impossible or would require disproportionate effort to do so).

18. **Restriction of Personal Data Processing**

- 18.1 Data subjects may request that Lanmark ceases processing the personal data it holds about them. If a data subject makes such a request, Lanmark shall retain only the amount of personal data pertaining to that data subject that is necessary to ensure that no further processing of their personal data takes place.
- 18.2 In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of the applicable restrictions on processing it (unless it is impossible or would require disproportionate effort to do so).

19. **Data Portability**

- 19.1 Where data subjects have given their consent to Lanmark to process their personal data in such a manner or the processing is otherwise required for the performance of a contract between Lanmark and the data subject, data subjects have the legal right under the Regulation to receive a copy of their personal data and to use it for other purposes (namely transmitting it to other Data Controllers, e.g. other organisations).
- 19.2 To facilitate the right of data portability, Lanmark shall make available all applicable personal data to data subjects in the following format[s]:
- a) Electronic data via secured and encrypted email;
 - b) Secured and password protected download area.
- 19.3 Where technically feasible, if requested by a data subject, personal data shall be sent directly to another Data Controller.
- 19.4 All requests for copies of personal data shall be complied with within one month of the data subject's request (this can be extended by up to two months in the case of complex requests in the case of complex or numerous requests, and in such cases the data subject shall be informed of the need for the extension).

20. **Objections to Personal Data Processing**

- 20.1 Data subjects have the right to object to Lanmark processing their personal data based on legitimate interests (including profiling), direct marketing (including profiling).
- 20.2 Where a data subject objects to Lanmark processing their personal data based on its legitimate interests, Lanmark shall cease such processing forthwith, unless it can be demonstrated that Lanmark's legitimate grounds for such processing override the data subject's interests, rights and freedoms; or the processing is necessary for the conduct of legal claims.
- 20.3 Where a data subject objects to Lanmark processing their personal data for direct marketing purposes, Lanmark shall cease such processing forthwith.
- 20.4 Where a data subject objects to Lanmark processing their personal data for scientific and/or historical research and statistics purposes, the data subject must, under the Regulation, 'demonstrate grounds relating to his or her particular situation'. Lanmark is not required to comply if the research is necessary for the performance of a task carried out for reasons of public interest.

21. **Automated Decision-Making**

- 21.1 In the event that Lanmark uses personal data for the purposes of automated decision-making and those decisions have a legal (or similarly significant effect) on data subjects, data subjects have the right to challenge to such decisions under the Regulation, requesting human intervention, expressing their own point of view, and obtaining an explanation of the decision from Lanmark.
- 21.2 The right described in Part 21.1 does not apply in the following circumstances:
- a) The decision is necessary for the entry into, or performance of, a contract between Lanmark and the data subject;
 - b) The decision is authorised by law; or

- c) The data subject has given their explicit consent.

22. **Profiling**

Where Lanmark uses personal data for profiling purposes, the following shall apply:

- a) Clear information explaining the profiling will be provided, including its significance and the likely consequences;
- b) Appropriate mathematical or statistical procedures will be used;
- c) Technical and organisational measures necessary to minimise the risk of errors and to enable such errors to be easily corrected shall be implemented; and
- d) All personal data processed for profiling purposes shall be secured in order to prevent discriminatory effects arising out of profiling (see Parts 22 and 23 of this Policy for more details on data security).

Section D: Our Other Obligations

23. **Accountability**

- 23.1 Lanmark's data protection officer is Mark Brown, email: mark.brown@lanmark.com.
- 23.2 Lanmark shall keep written internal records of all personal data collection, holding, and processing, which shall incorporate the following information:
 - a) The name and details of Lanmark, its data protection officer, and any applicable third party Data Controllers;
 - b) The purposes for which Lanmark processes personal data;
 - c) Details of the categories of personal data collected, held, and processed by Lanmark; and the categories of data subject to which that personal data relates;
 - d) Details (and categories) of any third parties that will receive personal data from Lanmark;
 - e) Details of any transfers of personal data to non-EEA countries including all mechanisms and security safeguards;
 - f) Details of how long personal data will be retained by Lanmark; and
 - g) Detailed descriptions of all technical and organisational measures taken by Lanmark to ensure the security of personal data.

24. **Privacy Impact Assessments**

Lanmark shall carry out Privacy Impact Assessments when and as required under the Regulation. Privacy Impact Assessments shall be overseen by Lanmark's data protection officer and shall address the following areas of importance:

- 24.1 The purpose(s) for which personal data is being processed and the processing operations to be carried out on that data;
- 24.2 Details of the legitimate interests being pursued by Lanmark;
- 24.3 An assessment of the necessity and proportionality of the data processing with respect to the purpose(s) for which it is being processed;

25. **Organisational Measures**

Lanmark shall ensure that the following measures are taken with respect to the collection, holding, and processing of personal data:

- a) All employees, agents, contractors, or other parties working on behalf of Lanmark shall be made fully aware of both their individual responsibilities and Lanmark's responsibilities under the Regulation and under this Policy, and shall be provided with a copy of this Policy;
- b) Only employees, agents, sub-contractors, or other parties working on behalf of Lanmark that need access to, and use of, personal data in order to carry out their assigned duties correctly shall have access to personal data held by Lanmark;
- c) All employees, agents, contractors, or other parties working on behalf of Lanmark handling personal data will be appropriately trained to do so;
- d) All employees, agents, contractors, or other parties working on behalf of Lanmark handling personal data will be appropriately supervised;
- e) Methods of collecting, holding and processing personal data shall be regularly evaluated and reviewed;
- f) The performance of those employees, agents, contractors, or other parties working on behalf of Lanmark handling personal data shall be regularly evaluated and reviewed;
- g) All employees, agents, contractors, or other parties working on behalf of Lanmark handling personal data will be bound to do so in accordance with the principles of the Regulation and this Policy by contract;
- h) All agents, contractors, or other parties working on behalf of Lanmark handling personal data must

ensure that any and all of their employees who are involved in the processing of personal data are held to the same conditions as those relevant employees of Lanmark arising out of this Policy and the Regulation;

- i) Where any agent, contractor or other party working on behalf of Lanmark handling personal data fails in their obligations under this Policy that party shall indemnify and hold harmless Lanmark against any costs, liability, damages, loss, claims or proceedings which may arise out of that failure.

26. **Transferring Personal Data to a Country Outside the EEA**

26.1 Lanmark may from time to time transfer ('transfer' includes making available remotely) personal data to countries outside of the EEA.

26.2 The transfer of personal data to a country outside of the EEA shall take place only if one or more of the following applies:

- a) The transfer is to a country, territory, or one or more specific sectors in that country (or an international organisation), that the European Commission has determined ensures an adequate level of protection for personal data;
- b) The transfer is to a country (or international organisation) which provides appropriate safeguards in the form of a legally binding agreement between public authorities or bodies; binding corporate rules; standard data protection clauses adopted by the European Commission; compliance with an approved code of conduct approved by a supervisory authority (e.g. the Information Commissioner's Office); certification under an approved certification mechanism (as provided for in the Regulation); contractual clauses agreed and authorised by the competent supervisory authority; or provisions inserted into administrative arrangements between public authorities or bodies authorised by the competent supervisory authority;
- c) The transfer is made with the informed consent of the relevant data subject(s);
- d) The transfer is necessary for the performance of a contract between the data subject and Lanmark (or for pre-contractual steps taken at the request of the data subject);
- e) The transfer is necessary for important public interest reasons;
- f) The transfer is necessary for the conduct of legal claims;
- g) The transfer is necessary to protect the vital interests of the data subject or other individuals where the data subject is physically or legally unable to give their consent; or
- h) The transfer is made from a register that, under UK or EU law, is intended to provide information to the public and which is open for access by the public in general or otherwise to those who are able to show a legitimate interest in accessing the register.

27. **Data Breach Notification**

27.1 All personal data breaches must be reported immediately to Lanmark's data protection officer.

27.2 If a personal data breach occurs and that breach is likely to result in a risk to the rights and freedoms of data subjects (e.g. financial loss, breach of confidentiality, discrimination, reputational damage, or other significant social or economic damage), the data protection officer must ensure that the Information Commissioner's Office is informed of the breach without delay, and in any event, within 72 hours after having become aware of it.

27.3 In the event that a personal data breach is likely to result in a high risk (that is, a higher risk than that described under Part 27.2) to the rights and freedoms of data subjects, the data protection officer must ensure that all affected data subjects are informed of the breach directly and without undue delay.

27.4 Data breach notifications shall include the following information:

- a) The categories and approximate number of data subjects concerned;
- b) The categories and approximate number of personal data records concerned;

- c) The name and contact details of Lanmark's data protection officer (or other contact point where more information can be obtained);
- d) The likely consequences of the breach;
- e) Details of the measures taken, or proposed to be taken, by Lanmark to address the breach including, where appropriate, measures to mitigate its possible adverse effects.

28. **Implementation of Policy**

This Policy shall be deemed effective as of 15th March 2018. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.

Schedule 1: Our Use Of Personal Data And Our Purpose

The following personal data may be collected, held, and processed by Lanmark:

- a) Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- b) Date of birth.
- c) Gender.
- d) Marital status and dependants.
- e) Next of kin and emergency contact information.
- f) National Insurance number.
- g) Bank account details, payroll records and tax status information.
- h) Salary, annual leave, pension and benefits information.
- i) Start date.
- j) Location of employment or workplace.]
- k) Copy of driving licence if applicable.
- l) Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process).
- m) Employment records (including job titles, work history, working hours, training records and professional memberships).
- n) Compensation history.
- o) Performance information.
- p) Disciplinary and grievance information.
- q) CCTV footage and other information obtained through electronic means such as swipecard records if such systems are implemented.
- r) Information about your use of our information and communications systems.
- s) Photographs.
- t) We may also collect, store and use the following "special categories" of more sensitive personal information:
 - u) Information about your health, including any medical condition, health and sickness records.
 - v) Genetic information and biometric data.
 - w) Information about criminal convictions and offences.

Situations in which we will use your personal information

- a) Making a decision about your recruitment or appointment.
- b) Determining the terms on which you work for us.
- c) Checking you are legally entitled to work in the UK.
- d) Paying you and, if you are an employee or we are under a legal obligation, deducting tax and National Insurance contributions.
- e) Liaising with your pension provider.

- f) Administering the contract that applies to our working relationship with you.
- g) Business management and planning, including accounting and auditing.
- h) Conducting performance reviews, managing performance and determining performance requirements.
- i) Making decisions about salary reviews and compensation.
- j) Assessing qualifications for a particular job or task, including decisions about promotions.
- k) Gathering evidence for possible grievance or disciplinary hearings.
- l) Making decisions about your continued employment or engagement.
- m) Making arrangements for the termination of our working relationship.
- n) Education, training and development requirements.
- o) Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work.
- p) Ascertaining your fitness to work.
- q) Managing sickness absence.
- r) Complying with health and safety obligations.
- s) To prevent fraud.
- t) To monitor your use of our information and communication systems to ensure compliance with our IT policies.
- u) To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- v) To conduct data analytics studies to review and better understand employee retention and attrition rates.
- w) Equal opportunities monitoring.

Schedule 2: Our Specific Data Protection Measures

These are the measures we take when working with personal data:

- a) All emails containing personal data must be encrypted (automated via Office 365)
- b) Where any personal data is to be erased or otherwise disposed of for any reason (including where copies have been made and are no longer needed), it should be securely deleted and disposed of. Hardcopies should be shredded, and electronic copies should be deleted securely using provided document and media shredders.
- c) Personal data may be transmitted over secure networks only; transmission over unsecured networks is not permitted in any circumstances;
- d) Personal data may not be transmitted over a wireless network if there is a wired alternative that is reasonably practicable;
- e) Personal data contained in the body of an email, whether sent or received, should be copied from the body of that email and stored securely. The email itself should be deleted. All temporary files associated therewith should also be deleted;
- f) Where Personal data is to be sent by facsimile transmission the recipient should be informed in advance of the transmission and should be waiting by the fax machine to receive the data;
- g) Where Personal data is to be transferred in hardcopy form it should be passed directly to the recipient or sent using a Lanmark approved delivery service with tracking;
- h) No personal data may be shared informally and if an employee, agent, sub-contractor, or other party working on behalf of Lanmark requires access to any personal data that they do not already have access to, such access should be formally requested from Mark Brown; email Mark.brown@lanmark.com.
- i) All hardcopies of personal data, along with any electronic copies stored on physical, removable media should be stored securely in a locked box, drawer, cabinet or similar;
- j) No personal data may be transferred to any employees, agents, contractors, or other parties, whether such parties are working on behalf of Lanmark or not, without the authorisation of a Lanmark Director;
- k) Personal data must be handled with care at all times and should not be left unattended or on view to unauthorised employees, agents, sub-contractors or other parties at any time;
- l) If personal data is being viewed on a computer screen and the computer in question is to be left unattended for any period of time, the user must lock the computer and screen before leaving it;
- m) No personal data should be stored on any mobile device (including, but not limited to, laptops, tablets and smartphones), whether such device belongs to Lanmark or otherwise without the formal written approval of a Lanmark Director and, in the event of such approval, strictly in accordance with all instructions and limitations described at the time the approval is given, and for no longer than is absolutely necessary].
- n) No personal data should be transferred to any device personally belonging to an employee and personal data may only be transferred to devices belonging to agents, contractors, or other parties working on behalf of Lanmark where the party in question has agreed to comply fully with the letter and spirit of this Policy and of the Regulation (which may include demonstrating to Lanmark that all suitable technical and organisational measures have been taken);
- o) All personal data stored electronically should be backed up monthly with backups stored onsite AND/OR offsite. All backups should be encrypted Lanmark own backup software;
- p) All electronic copies of personal data should be stored securely using passwords and provided Lanmark data encryption software;
- q) All passwords used to protect personal data should be changed regularly and should not use words or phrases that can be easily guessed or otherwise compromised. All passwords must contain a minimum combination of uppercase and lowercase letters, numbers, and symbols or use a minimum of three unrelated words connected via numbers and symbols. All software used by Lanmark is

designed to require such passwords;

- r) Under no circumstances should any passwords be written down or shared between any employees, agents, contractors, or other parties working on behalf of Lanmark, irrespective of seniority or department. If a password is forgotten, it must be reset using the applicable method. IT staff do not have access to passwords;
- s) Where personal data held by Lanmark is used for marketing purposes, it shall be the responsibility of Commercial Management team' email: commercial.team@lanmark.com to ensure that no data subjects have added their details to any marketing preference databases including, but not limited to, the Telephone Preference Service, the Mail Preference Service, the Email Preference Service, and the Fax Preference Service. Such details should be checked at least annually.