

PRIVACY POLICY (United Kingdom)

NIOA'S COMMITMENT TO PRIVACY

The NIOA Group of entities is committed to respecting your privacy rights and complying with the *Data Protection Act 2018* (“**the Act**”) and the UK General Data Protection Regulation (“**UK GDPR**”) (where applicable). The Act and the UK GDPR set clear standards for the collection, access, storage, and use of personal information. With that in mind, NIOA has implemented policies and procedures to ensure all personal data that it collects, handles, holds, and shares is done so in accordance with the Act and the UK GDPR (where applicable).

This Privacy Policy applies to all Personal Data processed for a Data Subject of the UK, regardless of the media on which that data is stored or whether it relates to past or present employees, workers, customers, clients or supplier contacts, shareholders, website users, or any other Data Subject the UK.

NIOA reserves the right to update this Privacy Policy from time to time, and any amendments will be incorporated into any updated policy and shown online.

WHAT IS PERSONAL DATA?

Personal Data means any information relating to an identified or identifiable natural person ('data subject'). Personal data excludes anonymous data or data that has had the identity of an individual permanently removed.

An identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, image of a person, home address, national insurance number, email address, IP address, Employee “P” number, Biometric data, Race/Ethnicity/Sexual orientation or an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

WE ARE COMMITTED TO

- Collecting and using personal data fairly and lawfully.
- Ensuring personal data held is secure, accurate and up to date.
- Respecting individual's rights in respect of their personal data.
- Only disclosing personal data to those who are authorised to receive it.
- Not holding excessive amounts of information or keeping it longer than is necessary.
- Protecting personal data with the use of appropriate technical and organisational measures.
- Keeping records of the processing of our personal data as required by the Data Protection Legislation.

In line with our

- Data Privacy policy and procedures;
- Privacy Notices;
- Client and business partner contracted commitments.

WHAT YOU SHOULD EXPECT FROM NIOA

- We will conduct our business in a way that prevents unwarranted intrusion into people's privacy and protects their personal data.
- We will act in accordance with Data Protection Legislation that sets out the principles we must follow to ensure that personal data is lawfully held, securely stored, accurate and used for the right purpose.

WHAT WE EXPECT FROM EMPLOYEES AND CONTRACTORS OF NIOA

- To demonstrate the commitments in this policy by acting with integrity and sensitivity when handling personal data.
- To complete all applicable privacy training.
- To speak up when faced with a situation where unsure what to do or when concerned about this policy. No action will be taken against employees or contractors reporting a genuine concern whether any concerns are proven or not.

WHAT WE EXPECT FROM NIOA DIRECTORS, OFFICERS AND MANAGERS

- To ensure this policy is promoted and applied in the area of responsibility
- To ensure obligations relating to Data Privacy as set out in this policy are understood and adhered to.
- To apply our Data Privacy policy in their area. These set out baseline requirements and steps which must be followed. They cover:
 - Data protection impact assessments and privacy by design and default assessments.
 - Privacy notice rules.
 - Data incident reporting.
 - Record keeping requirements
 - Data retention.
 - Handling of data subject access requests.

- Handling of international transfers of personal data.

How we achieve this

- Our management teams are supported by our Data Protection Officer and the compliance team who provide support on privacy matters.
- We take policy non-compliance very seriously. Privacy concerns are reported and managed through governance mechanisms.

For further information, please contact the Data Protection Officer, on *Email:* info@nioa.com.au

- If NIOA is unable to address your complaint in the way you have proposed, NIOA will provide the reasons for denying such an outcome and may propose an alternate solution.
- If you are not satisfied with NIOA's response, you may contact the Information Commissioner's Office to escalate the complaint. The Information Commissioner's contact details are below.

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow Cheshire SK9 5AF

Tel: 0303 123 1113

Website: <https://ico.org.uk>

Further Information

The ICO's website also contains helpful information about the Act and data protection generally.

VERSION CONTROL

Legal Notice Update

NIOA reserves the right to make any changes and corrections to this Privacy Policy and any Privacy Notices. Please refer to this page from time to time to review this Privacy Policy and any Privacy Notices (including any updated versions of same).

PRIVACY NOTICE (UNITED KINGDOM)

General Business

1 SCOPE

1.1 This Privacy Notice tells you what to expect from NIOA UK Limited and other entities of the NIOA Group that process Personal Data (collectively "NIOA").

1.2 This Privacy Notice sets out:

- The Kind of Personal Data NIOA Processes, i.e. collects, organise, host, structure, store, modify, use, combine, handle, share, access and look after your personal data, when you work for or with NIOA, apply for a role within NIOA or request further information from NIOA.
- How to exercise your rights in relation to your Personal Data
- Privacy Enquiries, Complaints, and Information

1.3 When using the term "**Personal Data**" or "**Personal Information**" in this Privacy Notice, we mean information that relates to you and from which you could be identified, either directly or indirectly in combination with other information which we may have in our possession.

2 THE KIND OF PERSONAL DATA NIOA PROCESSES

2.1 NIOA only processes Personal Data where it has a lawful basis for doing so.

2.2 The lawful bases for collecting or using personal data are:

- **Consent** – we have permission from you after we gave you all the relevant information. To be clear, you do have the right to withdraw your consent at any time. All of your data protection rights may apply except the right to object.
- **Contract** – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- **Legal Obligation** – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability
- **Public Task**- we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.
- **Legitimate Interests** – the processing is necessary for NIOA's legitimate interests or the legitimate interests of a third party (for e.g. marketing, order processing and staff administration), unless there is a good reason to protect your personal data which overrides those legitimate interests. All of your data protection rights may apply, except the right to portability.

2.3 Refer to the table below for details as to the types of categories of data and which lawful bases apply. As a Director, Office Employee or Contractor processing information related to Data Subjects in the UK, NIOA may process different types of personal data about you:

Purpose	Types of information	Lawful Basis for collection and use of your data including legitimate interest
<p>Provide Services and Goods, including delivery</p>	<ul style="list-style-type: none"> • name, title, address, telephone number, email address, date of birth; • Purchase or account history; • Payment details (including card or bank information for transfers and direct debits); • Credit reference information; • Account information • Website user information (including user journeys and cookie tracking). • Photographs or video recordings • Call recordings • Records of meetings and decisions; • CCTV footage or other recordings; • Identification documents • Information relating to compliments or complaints; • Information relating to marketing and communications or use of the website or business requirements; • Information relating to sponsorship; • Criminal history or background information; <p>NIOA also collects Special Category information for providing services and goods including delivery, which is subject to additional protection due to its sensitive nature:</p> <ul style="list-style-type: none"> • Race or ethnic origin (where required to do so by law). 	<p>Consent.</p> <p>Contract.</p> <p>Legal obligation (e.g. export/import laws, sanctions check, tax, workplace laws, contracts laws, etc).</p> <p>Legitimate interests – Our purpose and legitimate interests to provide services and goods including delivery are:</p> <p>(a) To process your account information, enter into a contract with you and complete our services and/or goods obligations or process an enquiry;</p> <p>(b) For collecting and recovering money owed to us;</p> <p>(c) To check a customer, supplier or individual’s identity, history and background or for identification, fraud and security purposes;</p> <p>(d) To support business and administrative functions of the business, including data analytics to improve our business and administrative functions or to understand data, troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of personal data;</p> <p>(e) to administer and manage our business and its operations, including but not limited to, management of functions and events, conducting interviews and recording meetings, conducting surveys;</p> <p>(f) To monitor use of and use data analytics to understand how you and other people use the features and functions of our website, IT systems and business assets;</p> <p>(h) To inform you of changes to our goods, services or policies;</p> <p>(i) to engage in discussions with its suppliers, contractors, retailers, manage product returns, warranty claims and refunds, perform sales and marketing activities or make recommendations about goods and/or services;</p> <p>For the legitimate interest of:</p> <p>(a) developing products and/or services and growing our business;</p>

		<ul style="list-style-type: none"> (b) security and safety and controlling access and monitoring use of IT, provision of administration and IT services, network security, to prevent fraud, including managing the use and access to its App and Website, or access to physical premises and to meet the obligations required under the applicable standards; (c) running our business effectively, management, managing disputes and to permit planning; (d) administration and processing of data including by maintaining records (includes distribution lists, legal advice including through internal and external lawyers, Special Category information where required to do so by law etc) payments and recovery of debts, reviewing and contacting references or and companywide communications; (e) to cooperate with law enforcement and regulatory authorities, and to assist with the prevention of crime and fraud. Where we process Special Categories of Personal Data we may also rely on substantial public interest (prevention or detection of crime) or legal claims; (f) to study how customers, suppliers and end users use our products/services or website, to develop them, to grow our business and to inform our marketing strategy; (g) to allow NIOA Group of entities to change its business and notify you of any changes to our goods, services or policies; (h) for the purpose of accounting and auditing, gathering evidence for an investigation or termination.
<p>Service Updates or Marketing Services</p>	<p>We collect or use the following personal information as part of managing salaries and pensions:</p> <ul style="list-style-type: none"> • Names and contact details; • Addresses; • Marketing preferences; • Location data; • Recorded images, such as photos or videos; • Call recordings; • Purchase or viewing history; 	<ul style="list-style-type: none"> • Explicit Consent for Marketing and Communications; • Contract. • Legal obligation (e.g. to fulfil our legal obligations, such as e.g. export/import laws, sanctions check, tax, workplace laws, contracts laws, etc). • Legitimate interests – our purpose and legitimate interest for Service Updates or Marketing Services are: <ul style="list-style-type: none"> (a) To contact you for marketing purposes, to send you information about our offers, news and events, surveys and polls, invitations and other events and other advertisements; (b) To process and deliver your order, to monitor use of, and

	<ul style="list-style-type: none"> • IP addresses; • Website and app user journey information; • Information relating to sponsorship; • Records of consent, where appropriate. <p>NIOA also collects Special Category information for providing services and goods including delivery, which is subject to additional protection due to its sensitive nature:</p> <ul style="list-style-type: none"> • Race or ethnic origin. 	<p>use data analytics to understand how you and other people use the features and functions of our website, IT systems, communications and business assets;</p> <ul style="list-style-type: none"> (c) administration and processing of data including by maintaining records (includes distribution lists, legal advice including through internal and external lawyers), and companywide communications, management of functions and events, conducting interviews and recording meetings, conducting surveys; (d) to cooperate with law enforcement and regulatory authorities, and to assist with the prevention of crime and fraud. (e) to allow NIOA Group of entities to change its business and notify you of any changes to our goods, services or policies; (f) running our business effectively, performance management or managing internal disputes and to perform sales and marketing activities or make recommendations about goods and/or services. <p>For the legitimate interest of:</p> <ul style="list-style-type: none"> (a) developing products and/or services and growing our business or providing updates to goods, services or policies, publicising our products or services and those of its Group companies; (b) running our business effectively, management, managing disputes and to permit planning; (c) security and safety and controlling access and monitoring use of IT, provision of administration and IT services, network security, to prevent fraud, including managing the use and access to its App and Website; (d) to cooperate with law enforcement and regulatory authorities; and (e) to study how customers, suppliers and end users use our products/services or website, products/services, marketing, customer relationships to develop them, make suggestions or recommendations of goods/services which may be of interest to you, to grow our business and to inform our marketing strategy.
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3 HOW NIOA COLLECTS AND HOLDS PERSONAL DATA

3.1 Collecting Personal Data

NIOA collects personal data in numerous ways including by phone, email, video communication or CCTV footage or other recordings, recruitment applications, interaction with the NIOA website, enquiries about products or services, subscribing to marketing communications or events (or events sponsored by NIOA), entering a competition, promotion or survey, providing feedback and through use of the NIOA mobile App.

NIOA also collects information from you in the following places: social media, identification and contact details personal data from publicly available sources (e.g. Companies House, Electoral Register), an employment agency, education organisations, referees (external or internal), security clearance providers, government departments and publicly available sources, suppliers and service providers, Banks and payment providers, previous employers, market research organisations, credit reference agencies, educational organisations providers of marketing lists and other publicly available sources.

More generally, personal data may be collected in contracts and other documents, when communicating or engaging with individuals during the normal course of business. Also, your image may be recorded when you enter our facility and stored on our network for security purposes.

Automated technologies or interactions. As you interact with our website (including using the careers portal, subscribing to marketing) we may automatically collect technical personal data about your equipment, browsing actions and patterns which might be used with other identifying data to establish other personal information about you. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive technical personal data about you if you visit other websites employing our cookies.

You will not be subject to decisions based on Automated Data Processing without your prior consent.

3.2 Personal Data Security

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. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

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.

4 WHO WILL YOUR PERSONAL DATA BE SHARED WITH?

We will only disclose Personal Data to a third party in very limited circumstances, or where we are permitted to do so by law. The receiving party must agree to treat your personal information in a manner consistent with this Privacy Notice. The third parties to whom we provide your Personal Data include:

4.1 Internal Third Parties within the NIOA Group of entities

Other organisations within the NIOA group of companies, including, but not limited to Australia and the United States of America, where such disclosure is necessary to provide you with our services or to manage our business (e.g. the purposes of recruitment, re-organisation, or any request or enquiry you make).

4.2 Disclosure of Personal Data to Other Third Parties

In some circumstances, we may share information with the following organisations:

- Government, regulatory and law enforcement bodies where we are required to do so in order to comply with our legal obligations or exercise our legal rights (e.g. pursue or defend a claim);
- insurance companies, brokers or other intermediaries, professional consultants or legal advisors, regulatory authorities and external auditors;
- Suppliers and service providers including IT suppliers to provide support and administration assistance for the internal operations or of web and email hosting, cloud storage, IT support, and analytical services and other third-party suppliers/partner organisations (e.g. Microsoft);

- Third parties that perform pre-employment checks and security checks, including relevant vetting services;
- Banks and payment providers to authorise and complete payments; and
- Organisations where we have specifically authorised the storage of your personal data., e.g. People Center, Inc. d/b/va Rippling. This data processor does the following activities for us: manage the HR IT System, store HR records and other HR administration and processing services; or
- Organisations to assist with exercising our legal rights (e.g. pursue or defend a claim).

4.3 Sharing information outside of the UK

Where necessary, we will transfer personal information outside of the UK. When doing so, we comply with the UK GDPR, making sure appropriate safeguards are in place.

To ensure compliance, when transferring within the NIOA Group of entities, we are covered by an intra-group data sharing agreement entered into by all relevant entities within the NIOA Group, which contractually obliges each entity to ensure personal information receives an adequate and consistent level of protection.

Some third parties (including related parties) (and their data centre) may be located outside of the United Kingdom. In such cases, NIOA ensures that it only engages with companies who are reputable and use cutting-edge technology that ensures personal data is stored securely to the highest industry standards. Examples of such third parties include (but are not by any means limited to) Microsoft, Google and DocuSign. Transfers to such third parties are either managed under:

- An International Data Transfer Agreement (IDTA) or Standard Contractual Clauses plus UK Addendum; or
- Ensuring that the country in which your personal data will be handled has been deemed adequate by the European Commission/ICO.

By reading the Privacy Policy, this Privacy Notice, interacting with the NIOA website, utilising the NIOA mobile App, utilising NIOA provided IT assets and by giving personal data to NIOA you consent to NIOA disclosing your personal data to overseas recipients in accordance with this policy, unless express written notification to the contrary is received from you by NIOA. You acknowledge that NIOA's support services are run from Australia and that in providing any data in your dealings with us in the United Kingdom you consent to this data being disclosed, used and potentially stored outside of the United Kingdom (i.e. specifically to Australia).

For those who are applying for employment with NIOA, we may require police and background checks to assess suitability for the position.

As NIOA is committed to protecting the privacy of individuals, NIOA will view unauthorised disclosure of, or access to, personal data by its employees, contractors, or agents, as a serious breach of this Privacy Notice. Appropriate action (which may include discipline or legal action) may be taken in such cases.

For further information or to obtain a copy of the appropriate safeguard for any of the transfers below, please contact us as described in the Privacy Enquiries, Complaints and Information section below.

5 YOUR RIGHTS FOR PERSONAL DATA

You have the following legal rights in connection with your personal information:

- **Request access** to your Personal Data (this is called a Subject Access Request). This enables you to receive a copy of the Personal Data we hold about you as well as information about how your personal data will be processed and the legal basis for the processing.
- **Request correction of the Personal Data that we hold about you.** You can request to have any incomplete or inaccurate Personal Data we hold about you corrected, though we may need to verify the accuracy of the new Personal Data you provide to us.
- **Request deletion of your personal data.** You can ask us to delete or remove Personal Data 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 data where you have successfully exercised your right to object to processing. Please note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you at the time of your request.

- **Object** to processing of your Personal Data where we are relying on a legitimate interest (or those of a third party), or automated decision making and you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - (a) If you want us to establish the data's accuracy.
 - (b) Where our use of the data is unlawful, but you do not want us to erase it.
 - (c) Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - (d) You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Where an individual chooses not to provide personal data, it may limit one or more of NIOA's functions including its ability to communicate, send information, engage in business, or process an employment application.

If you want to exercise any of these rights, please refer to the Privacy Enquiries, Complaints and Information section below.

Please note that exemptions set out in the Data Protection Act 2018 may apply meaning that we do not have to grant your request in full. However, we will always meet your request as far as we are able.

If you receive marketing emails that are delivered through NIOA's third-party email marketing system, you may update your personal data or unsubscribe from such communication by clicking the appropriate links in the footers of those emails. This is in addition to your right to object to your data being processed where you believe that such processing impacts on your fundamental rights and freedoms, including for marketing purposes.

6 RETAINING PERSONAL DATA

NIOA will only retain your personal data for as long as reasonably necessary to fulfil the purpose for which it was obtained, to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, tax, regulatory or reporting requirements.

We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe that there is a prospect of litigation in respect of our relationship with you.

It is important to us that the personal information we hold about you is accurate and current. Please keep us informed of any changes to our Privacy Officer.

7 EU DATA RIGHTS

NIOA has systems that facilitate your requests in relation to your EU Data Rights. Our actions and responsibilities will depend on whether we are the controller or processor of the personal data in question. Depending on our role as either a controller or processor, the process for enabling EU Data Rights may differ, and are always subject to applicable law.

Please contact us using the contact details below if you would like to make an EU Data Rights request or if you require assistance in relation to your EU Data Rights.

Where you make any request in relation to EU Data Rights, the UK GDPR or the Act NIOA reserves its rights to verify your identity before assisting you with your request that is specific to personal data.

NIOA will take reasonable steps to comply with requests concerning EU Data Rights, subject to NIOA's legal rights and obligations in relation to personal data. If NIOA cannot or will not comply with any such request, it will provide you with the basis of not doing so as soon as reasonably practicable.

Those who are not satisfied with the way we handle a request in relation to EU Data Rights have the right to make a complaint to the Data Protection Authority for EU residents, or the Information Commissioner's Office (ICO) for UK residents.

Furthermore, in the event of a data breach where reporting is required to the ICO within 72 hours, NIOA will inform you of any incident that compromises your personal data.

8 PRIVACY ENQUIRIES, COMPLAINTS AND INFORMATION

8.1 Enquiries and Complaints

If you would like to make an enquiry, or make a complaint regarding your personal data, you should contact us first by using the email, post, fax, or telephone contact details below.

NIOA

Privacy Officer – Nigel Everingham

210 Bristol Business Park

The Crescent

Stoke Gifford BS16 1EJ

Email: info@nioa.com.au

When making a complaint regarding privacy, correspondence should include the nature of the complaint and the proposed outcome that you are seeking.

If you make any kind of data protection request, we will respond to you without any undue delay. NIOA may refuse to provide information if an exemption or restriction applies or if the request(s) are manifestly unfounded or excessive.

If NIOA is unable to address your complaint in the way you have proposed, NIOA will provide the reasons for denying such an outcome and may propose an alternate solution.

If you are not satisfied with NIOA's response, you may contact the Information Commissioner's Office to escalate the complaint. The Information Commissioner's contact details are below.

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The ICO's website also contains helpful information about the Act and data protection generally.

9 VERSION CONTROL

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ANNEX A DEFINITIONS

In this Policy, unless otherwise indicated by the context:

Automated Decision-Making (ADM)	when a decision is made which is based solely on Automated Processing (including profiling) which produces legal effects or significantly affects an individual. The UK GDPR prohibits Automated Decision-Making (unless certain conditions are met) but not Automated Processing.
Automated Processing	any form of automated processing of Personal Data consisting of the use of Personal Data to evaluate certain personal aspects relating to an individual, in particular to analyse or predict aspects concerning that individual's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements. Profiling is an example of Automated Processing, as are many uses of artificial intelligence (AI) where they involve the processing of Personal Data
Data Subjects	a living, identified or identifiable individual about whom we hold Personal Data. Data Subjects may be nationals or residents of any country and may have legal rights regarding their Personal Data.
DPO or Data Protection Officer	Means the Privacy Officer described in the "Privacy Enquiries, Complaints, and Information" section
Explicit Consent	consent which requires a very clear and specific statement (that is, not just action).
Privacy Notices (also referred to as Fair Processing Notices)	separate notices setting out information that may be provided to Data Subjects when the Company collects information about them. These notices may take the form of: (a) general privacy statements applicable to a specific group of individuals (for example, employee privacy notices or the website privacy policy); or (b) stand-alone, one-time privacy statements covering Processing related to a specific purpose
Special Categories of Personal Data	Means information revealing racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health conditions, sexual life, sexual orientation, biometric or genetic data.
UK GDPR	Means the retained EU law version of the General Data Protection Regulation ((EU) 2016/679) as defined in the Data Protection Act 2018. Personal Data is subject to the legal safeguards specified in the UK GDPR.