

Privacy Notice – Business Partners

1. Introduction

This Privacy Notice applies to individuals who are providing or receiving goods or services to/from Total People/MOL (“**business partners**”, “**you**” or “**your**”), working under or in relation to our business partners (e.g. suppliers, vendors, business contacts).

2. What is the purpose of this document?

Total People and MOL (“**we**”, “**our**”, “**us**”), are committed to protecting the privacy and security of your personal information (“**personal data**”). This Privacy Notice describes how we collect and use personal information about you in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation (the “**GDPR**”), together with other UK data protection laws.

Our Data Protection Policy, as well as more information on how we process personal data, can be found at: <https://www.totalpeople.co.uk/dataprotection/> You can also contact our Data Protection Officer at dpo@ltegroup.co.uk if you have any questions regarding this document.

It is important that you read this Privacy Notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing information about you, so that you are aware of how and why we are using your personal data and what your legal rights are in relation to it.

3. The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

Some of the personal data we collect about you is classed as being 'special category personal data'*, for example information relating to your ethnicity or any disability. Access to and sharing of this information is controlled very carefully.

The categories of personal information that we collect, store, and use about you may include:

	Business Partners
Accreditations	✓
Complaint data	✓
Credit history	✓
Criminal offence data*	✓
Data captured by CCTV systems	✓
Information about your tax status	✓
Invoicing details	✓
IP addresses and cookies	✓
Personal information and contact details	✓
Qualifications, licensing, and registration status	✓

We may collect other additional personal information during the course of our relationship with you.

4. How is your personal information collected?

We typically collect personal information about you when we purchase goods and/or services from you or vice versa. We may collect additional personal information throughout the course of our relationship with you, for example via email, telephone or via our website.

5. How will we use information about you?

Overall, we use your personal data to manage your relationship with Total People/MOL as a supplier or customer. We have set out the main purposes for processing below.

Data protection laws require us to meet certain conditions before we are allowed to use your personal data in the manner described in this Privacy Notice, including having a "lawful basis" for the processing. Where we process special category personal data or criminal offence data, we are required to establish an additional lawful basis for processing that data.

Some of the below grounds for processing will overlap and there may be several grounds which justify our use of your personal information. We may process your personal information without your knowledge or consent where this is required or permitted by law.

Purpose	Lawful Basis
<p>To take steps to enter a contract between you/your organisation and us</p> <p>To administer, or otherwise deliver, our obligations arising from a contract entered into with you/your organisation</p> <p>To fulfil any requests you have made regarding our order(s) or to contact you with information relevant to your interaction with us</p> <p>To ascertain your ability to provide us with goods and/or services</p>	<ul style="list-style-type: none"> • To comply with our legal obligations, e.g. for taxation and employment law purposes • Necessary for the performance of a contract • Necessary to perform a task in the public interest, or for official functions, where the task/function has a clear basis in law • Where it is needed to protect a person's vital interests and you are not capable of giving your consent (e.g. in an emergency)
<p>Internal and statutory reporting, audit, and other legal obligations, including compliance with health and safety law</p>	<ul style="list-style-type: none"> • To comply with our legal obligations, e.g. employment and health and safety law • Performance of a task in the public interest (education)

Do we need your consent?

We do not generally process your personal data based on your consent (as we can usually rely on another legal basis, as outlined in the table above). If we do process your personal information based on your consent, we will inform you of this before we start the processing and you will have the right to withdraw your consent at any time.

6. If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you or your organisation, such as purchasing the goods and/or services from you).

7. Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the

original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

8. 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.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making unless we have a lawful basis for doing so and we have notified you.

9. Data sharing

We may share your personal data with third parties that are essential to complying with our legal and contractual obligations, such as external auditors and hosted technology solution providers. This will only be undertaken as part of the administration and management of our contract with you. A full register of who we may share your personal data with and why is available on request: dpo@ltegroup.co.uk

All our third-party partners/service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party partners/service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Your data may be transferred outside of the UK, for example, where we use third-party providers to deliver our services, such as externally-hosted software or cloud providers who store data globally. We undertake strict due diligence on all partners to ensure that they have the adequate safeguards in place to protect your data under Article 46 GDPR.

10. Data security

We have measures in place to help protect the security of your information.

Where the infrastructure is in our direct control, we have put in place appropriate security measures to help 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 legitimate need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

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

11. Data retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for. Details of retention periods for different aspects of your personal information are available in our **Records Management Policy** and **Data Retention Schedule** (available on request from dpo@ltegroup.co.uk).

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Once we no longer require access to your personal information we will retain and securely destroy it in accordance with our data retention policy and applicable laws and regulations.

12. Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes.

13. Your individual rights in connection with personal data

Subject to certain conditions, you have the following rights in relation to your personal data:

Access to your personal information

Correction of the personal information we hold about you if it is incorrect.

Erasure of your personal information. We can only do this in certain circumstances.

Restriction of processing of your personal information

Transfer of your personal information to another party

Objection to processing of your personal information

Suspension of processing of your personal information

If you wish to exercise any of the above rights, please contact us via email:

dpo@ltegroup.co.uk. Further guidance on your rights is available from the Information Commissioner's Office (<https://ico.org.uk>).

14. If you are unhappy with how we have handled your data

If you are unhappy with how we have handled your data, you may lodge a formal complaint with the following department:

The Company Secretary & General Counsel

LTE Group
Whitworth House
Ashton Old Road
Manchester
M11 2WH

dpo@ltegroup.co.uk

If you do not wish to discuss your complaint with us, or you are unhappy with our response, you also have the right to lodge a complaint with a supervisory authority, the Information Commissioner's Office (ICO).

Further information is available on the ICO website, or via the telephone:

<https://ico.org.uk/global/contact-us/>
0303 123 1113

More information on the ICO's complaint procedure can be accessed at:

<https://ico.org.uk/make-a-complaint/>