

Data Protection Notice

Please read this data protection notice carefully. It applies to individuals who are providing goods or services to Total People Limited or employed or engaged by suppliers of goods and/or services to Total People Limited (“**you**” or “**your**”).

1. What is the purpose of this document?

Total People Limited (company number 06380764) (“**Total People**”, “**we**”, “**our**”, “**us**”), a wholly owned subsidiary of LTE Group (a statutory corporation and an exempt charity for the purposes of the Charities Act 2011), is committed to protecting the privacy and security of your personal information. This data protection notice describes how we collect and use personal information about you in accordance with the General Data Protection Regulation EU 2016/679 (the “**GDPR**”), together with other UK data protection laws. You can contact us via email to dpo@ltegroup.co.uk if you have any questions regarding this document.

For the purposes of this document, we are a “data controller”. This means that we are responsible for deciding how we hold and use any personal information about you. We are required under data protection legislation to notify you of the information contained in this document. This notice explains what personal data Total People holds about you, how we share it, how long we keep it and what your legal rights are in relation to it.

Data protection principles

We will comply with UK data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.

5. Kept only as long as necessary for the purposes we have told you about.

6. Kept securely.

2. 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).

We may collect, store, and use the following categories of personal information about you:

- Contact details such as name, title, addresses, telephone numbers and email addresses.
- Credit history.
- Qualifications.
- Accreditations.
- Criminal convictions.
- CCTV footage.

3. How is your personal information collected?

We typically collect personal information about you when we purchase goods and/or services from you. We may collect additional personal information throughout the period of you/your organisation supplying the goods and/or services to us for example via email, telephone or via our website.

4. How we will use information about you

Comprehensive details of how we use your personal information is available on request from dpo@ltegroup.co.uk.

In summary, we will use your personal information as follows:

- To administer or otherwise carry out our obligations arising from any contracts entered into with you/your organisation or to take steps to enter into any contracts between you/your organisation and us.

- To fulfil any requests you have made regarding our order(s) or to contact you with information relevant to your interaction with us.
- To ascertain your ability to provide us with goods and/or services. Our lawful basis for these activities above is necessity to perform our contract of sale with you/your organisation.
- To capture CCTV footage at our sites to maintain the security of the premises and for preventing and investigating crime.
- For audit purposes of Total People.

Our lawful basis for these activities is that the processing is necessary for the performance of a task (education) carried out in the public interest. Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

5. 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).

6. 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 collect 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.

7. Information about criminal convictions

We will only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our data protection policy. We have in place an appropriate policy and safeguards which we are required by law to maintain when processing such data.

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.

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

9. Data sharing

We may have to share your data with third parties, for credit application forms, references, CCTV Recording other regulatory authorities and LTE Group.

We may sometimes be obliged to disclose your personal information by law such as by a regulator with appropriate power, or court order or to otherwise comply with the law. Potential recipients include HM Revenue & Customs. In addition, information held by or for public bodies can be subject to freedom of information requests.

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.

We will not transfer your data outside the European Union without first notifying you of our intentions and of the safeguards that apply to your data.

10. Data retention

How long will we use your information for?

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 retention policy which is available on request. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

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.

11. Rights of access, correction, erasure, and restriction

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

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to

processing (see below).

- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes (for example, email marketing or phone calls).
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing 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. 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.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact us by email at dpo@ltegroup.co.uk we will explain any conditions that may apply.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact dpo@ltegroup.co.uk. Once we have received



notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Further guidance on your rights is available from the Information Commissioner's Office (<https://ico.org.uk/>). You have the right to complain to the UK's supervisory office for data protection, the Information Commissioner's Office at <https://ico.org.uk/concerns/> if you believe that your data has been processed unlawfully.

12. Changes to this document

We reserve the right to update this document at any time, for example if the law or regulatory requirements change, if technology changes or to make Total People's operations and procedures more efficient. We keep our privacy policy under regular review and any updated version will available on our website.

A part of LTEgroup



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