



OCS Visitors Privacy Notice

Purpose and Scope	<p>We value the privacy of those who provide personal information to us.</p> <p>This Privacy Notice describes:</p> <ul style="list-style-type: none">• what personal information we collect about our visitors and third parties• how we use and otherwise process that information;• the basis upon which we process it;• with whom it is shared; and• how it is stored. <p>This Notice applies to all visitors and third parties ("you" and "your"), of OCS Group International Limited, company number [02946849], a limited company registered at Ground Floor, Unit 5, The Enterprise Centre, Kelvin Lane, Manor Royal, Crawley, RH10 9PE ("OCS", "we", "our"); data protection registration number Z9911825, and any members of our groups including any subsidiaries as defined by section 1159 of the Companies Act 2006.</p>
Compliance and Accountability	<p>This Privacy Notice may be amended from time to time. Any changes we make to this Privacy Notice in the future will be made available where appropriate. Please check back frequently to see any updates or changes to notice content.</p>
Information Collection	<p>We may collect and use any of the following information about you and we refer to this as "personal information" throughout this notice:</p> <p>Your personal details:</p> <ul style="list-style-type: none">➤ your full name (including first name, maiden name and surname);➤ proof of identification and address; (to include passport details where applicable)➤ job title➤ vehicle licence details; <p>Your employment details:</p> <ul style="list-style-type: none">➤ name of employer;➤ address of employer;➤ contact number of employer; <p>Physical security records:</p> <ul style="list-style-type: none">➤ CCTV footage: images of individuals identifiable from the apron of OCS properties.➤ Biometric data (fingerprints) for use with clock in terminals on some sites➤ Photographs: images will be used on access cards for identification purposes
Sources of personal information	<p>In most cases, we seek to obtain information directly from an individual; however, we may also receive some of this personal information from third parties, such as recruitment agencies, DVLA, your employer and public agencies.</p>
Special categories of personal data	<p>Some of the personal information which you may provide to us about you may contain special category data. We will only process special category data where we have an additional lawful basis for processing.</p>
Use of your personal information	<p>We may collect, use and store your personal information for the following reasons:</p> <ul style="list-style-type: none">➤ to register you as a visitor to site➤ to issue you a visitor identity access card➤ monitoring electronic communication and internet usage for the purpose of ensuring that our policies are being complied with and for legitimate business purposes;➤ health and safety management for our staff and facilities;➤ ensuring adequate insurance coverage for our business;➤ compliance with any procedures, laws and regulations which apply to us;➤ establishing, exercising or defending our legal rights; and➤ otherwise, for the lawful operation of our business, to include business management and planning, auditing and accounting



Legal bases for personal information use	<p>We need to have a legal basis for using your personal information for the processing set out in this privacy notice as set out below:</p> <ul style="list-style-type: none">• processing is necessary in order to comply with legal obligations which apply to us (e.g. our obligations under health and safety legislation or under statutory codes of practice);• processing is necessary for the performance of a contract, or to take steps to enter into a contract;• processing is necessary in order to fulfil our legitimate interests or the interests of a third party, but only if these are not overridden by your interests, rights or freedoms. Our legitimate interests include: to run our business lawfully and efficiently, to ensure a safe environment for our visitors;• where you have provided your explicit consent to do so;• processing is necessary to protect the vital interests of the data subject or another person (for example, in the case of a medical emergency); and• the law otherwise permits or requires the processing. <p>We will only process Special Category Data where we have an additional lawful basis for processing on one of the following grounds:</p> <ul style="list-style-type: none">• Explicit consent – where you have given us explicit consent.• Legal obligation related to employment - The processing is necessary for a legal obligation in the field of employment and social security law or for a collective agreement.• Vital interests - The processing is necessary in order to protect the vital interests of the individual or of another natural person where the data subject is physically or legally incapable of giving consent. This is typically limited to processing needed for medical emergencies.• Not for profit bodies - The processing is carried out in the course of the legitimate activities of a not-for-profit body and only relates to members or related persons and the personal data is not disclosed outside that body without consent.• Public information - The processing relates to personal data which is manifestly made public by the data subject.• Legal claims - The processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.• Substantial public interest - The processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law.• Healthcare - The processing is necessary for healthcare purposes and is subject to suitable safeguards.• Public health - The processing is necessary for public health purposes and is based on Union or Member State law.• Archive - The processing is necessary for archiving, scientific or historical research purposes, or statistical purposes and is based on Union or Member State law. Member States can introduce additional conditions in relation to health, genetic, or biometric data. <p>If we have sought your consent to collect and use certain types of personal information, you have the right to withdraw your consent at any time, by contacting DataProtection@ocs.com.</p>
Disclosure of personal information to Group companies	<p>Your business contact information will be made available to OCS employees, temporary staff, workers and contractors, and with customers, agencies and suppliers in the course of providing our services. This information includes your name, position, workplace telephone numbers, work addresses and email addresses,</p> <p>Your personal information may be shared with any company that is a member of our group, where we have a lawful basis upon which to do so for example internal administrative purposes, corporate strategy, auditing and monitoring and research & development.</p> <p>We may also share your personal information with our group companies where they provide products and services to us, such as information technology systems, human resources services and employee monitoring.</p> <p>Access to your personal information is limited to those employees who need to know and may include HR, the Helpdesk, Legal, Insurance, IT, Finance and Payroll.</p>



<p>Disclosure of personal information to third parties</p>	<p>We may share your personal information with the following categories of third parties:</p> <ul style="list-style-type: none"> • companies that provide products and services to us, such as: • insurance companies, • information technology systems suppliers and support, including email archiving, telecommunication suppliers, back-up and disaster recovery and cyber security services; psychometric testing providers and other outsourcing providers, such as off-site storage providers and cloud services providers. • other parties such as legal and regulatory authorities, accountants, auditors, lawyers and other outside professional advisors. <p>We will also disclose your personal information to third parties:</p> <ul style="list-style-type: none"> • where it is in our legitimate interests to do so to run, grow and develop our business, for example: <ul style="list-style-type: none"> ○ if we sell or buy any business or assets, we may disclose your personal information to the prospective seller or buyer of such business or assets; ○ if OCS or substantially all of its assets are acquired by a third party, in which case personal information held by OCS will be one of the transferred assets; • if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, any lawful request from government or law enforcement officials and as may be required to meet national security or law enforcement requirements or prevent illegal activity; • to enforce contractual obligations, to respond to any claims, to protect our rights or the rights of a third party, to protect the safety of any person or to prevent any illegal activity; or • to protect the rights, property or safety of OCS, our employees, workers and contractors, customers, suppliers or other persons.
<p>Transfers of information outside of the EEA</p>	<p>We are a global company and may transfer the personal data we collect about you to countries outside the EEA so long as there is a lawful basis for doing so or we have your consent. In certain circumstances we may seek your explicit consent to send your personal data outside of the EEA. Before sending your personal data to countries outside of the EEA data we will ensure that adequate data protection provisions are in place, the processor has provided appropriate safeguards to ensure enforceable rights and legal remedies or other specified conditions are met under data protection law. When doing so we will inform you in clear terms of the data protection framework in place in the relevant countries in order to enable you to make an informed decision.</p>
<p>Restrictions on use of personal information by recipients</p>	<p>Any third parties with whom we share your personal information are limited (by law and by contract) in their ability to use your personal information for the specific purposes identified by us. We will always ensure that any third parties with whom we share your personal information are subject to privacy and security obligations consistent with this privacy notice and applicable laws.</p>
<p>Security</p>	<p>OCS is committed to protecting personal information from loss, misuse, disclosure, alteration, unavailability, unauthorised access and destruction and takes all reasonable precautions to safeguard the confidentiality of personal information, including through use of appropriate organisational and technical measures. Organisational measures include physical access controls to our premises, staff training and locking physical files in filing cabinets.</p> <p>Technical measures include the use of encryption, passwords for access to our systems and use of anti-virus software.</p> <p>In the course of provision of your personal data to us, your personal information may be transferred over the internet. Although we make every effort to protect the personal information which you provide to us, we cannot guarantee the security of your personal information transmitted to us over the internet and any such transmission is therefore at your own risk.</p>
<p>Your Rights</p>	<p>You have certain rights in relation to your personal information under data protection legislation. If you would like further information in relation to these or would like to exercise any one of them, please contact DataProtection@ocs.com. You have the right to request that we:</p> <ul style="list-style-type: none"> • provide access to any personal information which we hold about you; • update any of your personal information which is out of date or incorrect;



	<ul style="list-style-type: none">• delete any personal information which we hold about you;• restrict the way that we process your personal information;• provide your personal information to a third-party provider of services;• provide you with a copy of any personal information which we hold about you; or• consider any valid objections which you have to our use of your personal information.
Retention of personal information	We keep your personal information for no longer than necessary for the purposes for which the personal information is used or otherwise processed. The length of time we retain personal information depends on the purposes for which we collect and use it and / or as required to comply with applicable laws. In all cases we will only retain data as required to support legitimate business purposes.
Third party websites	You may, from time to time, access links to or other websites operated by third parties (e.g. training providers, industry news sources, sales portal, insurance, pensions, well-being, bulletins etc). Please note that this Privacy policy only applies to the personal information that we collect from or about you and we cannot be responsible for personal information collected and stored by third parties. Third party websites have their own terms and conditions and privacy policies, and you should read these carefully before you submit any personal information to these websites. We do not endorse or otherwise accept any responsibility or liability for the content of such third-party websites or third-party terms and conditions or policies.
Further questions or making a complaint	If you have any queries or complaints about our collection, use or storage of your personal information, or if you wish to exercise any of your rights in relation to your personal information, in the first instance, contact your Line Manager. Thereafter, please contact our Data Protection Team - email DataProtection@ocs.com - or write to Ground Floor, Unit 5, The Enterprise Centre, Kelvin Lane, Manor Royal, Crawley, RH10 9PE . We will investigate and attempt to resolve any such complaint or dispute regarding the use or disclosure of your personal information. You may also make a complaint to the Information Commissioner's Office (ICO) Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF on 0303 123 113