DATA PROTECTION POLICY

Sword Group

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sword-group.com

contact@sword-group.com

This Policy relates to information from which individuals can be identified and sets out how the Companywill manage such information.

DEFINITIONS

Throughout this Policy, the following definitions apply:

Company name: Sword Group SE

Company Personnel: all employees, workers (contractors, agency workers, consultants),directors, members.

Data Controller: the person or organisation that determines when, why and how to processPersonal Data.

Data Subject: an identified or identifiable individual about whom we hold Personal Data.

Data Privacy Impact Assessment (DPIA): tools and assessments used to identify and reduce risksof a data processing activity.

Data Protection Officer (DPO): the person required to be appointed in specific circumstances under the GDPR. Where a DPO has not been appointed, this term refers to the Data Protection Compliance Manager or refers to the Company data protection/privacy team with responsibility for data protection compliance.

General Data Protection Regulation (GDPR): the EU General Data Protection Regulation.

Personal Data: any information identifying a Data Subject or information relating to a Data Subject that we can identify (directly or indirectly) from that data alone or in combination with other identifiers.

Personal Data Breach: the loss, or unauthorised access, disclosure or acquisition of Personal Data.

Privacy Guidelines: the Company Privacy/GDPR related guidelines provided to assist in interpreting and implementing this Data Protection Policy and Related Policies, as amended from time to time. These are available from each Country's DPO.

Privacy Notices: separate notices setting out information that may be provided to you that details why we collect information about you and what we do with it.

Processing or Process: any activity that involves the use of Personal 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 transmitting or transferring Personal Data to third parties.

Related Policies: the Company's policies, operating procedures or processes related to this Data Protection Policy and designed to protect Personal Data, as amended from time to time. These are available from each country's DPO.

Sensitive Personal Data: 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, and Personal Data relating to criminal offences and convictions.

INTRODUCTION

This Data Protection Policy applies to all Personal Data the Company processes regardless of how thatdata is stored or whether it relates to past or present employees, apprentices, workers, contractors, agency workers, volunteers and interns. Separate policies in respect of data subjects who are job applicants, customers and suppliers are available from each country's DPO.

This Data Protection Policy applies to all Company Personnel. You must read, understand and comply with this Data Protection Policy. You must also comply with all such Related Policies and Privacy Guidelines, including any amendments. Any employee who is found to have breached this Data Protection Policy may be subject to disciplinary action up to and including summary dismissal.

SCOPE

We recognise that the correct and lawful treatment of Personal Data will maintain confidence in the organisation and will provide for successful business operations. It is a critical responsibility that we takeseriously at all times.

Whilst employees are required to comply with the terms of this Data Protection Policy, it does not form part of their employment contract.

Please contact your DPO with any questions about the operation of this Data Protection Policy or if you have any concerns that this Data Protection Policy is not being or has not been followed.

TYPES OF DATA WE HOLD

Personal data is kept in personnel files or within the Company's HR systems. The type of data held bythe Company includes but is not limited to the following:

- name, address, phone numbers - for individual and next of kin
- CVs and other information gathered during recruitment
- references from former employers
- National Insurance numbers
- job title, job descriptions and pay grades
- conduct issues such as letters of concern, disciplinary proceedings
- holiday records
- internal performance information
- medical or health information
- sickness absence records
- tax codes
- terms and conditions of employment
- training details
- driving records.

Relevant individuals should refer to the Company's Privacy Notice for more information on the reasonsfor its processing activities, the lawful bases it relies on for the Processing and data retention periods.

PERSONAL DATA PROTECTION PRINCIPLES

LAWFULNESS AND FAIRNESS

Data may only be collected by the Company if the Processing is fair, lawful and for specified purposes,some of which are set out below:

- the Data Subject has given his or her consent;
- the Processing is necessary for the performance of a contract with the Data Subject;
- to meet our legal compliance obligations;
- to protect the Data Subject's vital interests;
- to pursue our legitimate interests.

CONSENT

In some circumstances consent maybe required. Consent should be freely given, specific and informed.It may also be withdrawn at any time.

TRANSPARENCY

Information in relation to how and why we collect data will be provided through appropriate PrivacyNotices.

Personal Data will be collected only for specified, explicit and legitimate purposes. It will not be further Processed in any manner incompatible with those purposes. We will not Process Personal Data for new,different or incompatible purposes from that disclosed when it was first obtained unless the Data Subjecthas been informed and has consented where necessary.

DATA MINIMISATION

Personal Data will be adequate, relevant and limited to what is necessary in relation to the purposes forwhich it is Processed. When Personal Data is no longer needed, it is deleted or anonymised in accordance with the Company's data retention guidelines.

ACCURACY

We will ensure that the Personal Data we use and hold is accurate, complete, kept up to date and relevantto the purpose for which we collected it. We will take all reasonable steps to destroy or amend inaccurateor out-of-date Personal Data.

STORAGE LIMITATION

Personal Data will be kept in an identifiable form for no longer than is necessary for the purposes for which the data is processed.

SECURITY INTEGRITY AND CONFIDENTIALITY

PROTECTING PERSONAL DATA

Personal Data will be secured by appropriate technical and organisational measures against unauthorised or unlawful Processing, and against accidental loss, destruction or damage.

You must follow all procedures and technologies we put in place to maintain the security of all PersonalData from the point of collection to the point of destruction as set out in our Information Technology Policy.Where you work remotely, whether at home or at client sites, or Process Personal Data on personal devices, you must follow all guidance we issue in relation to this.

Failure to follow the Company's rules on data security may be dealt with via the Company's disciplinaryprocedure. Appropriate sanctions include dismissal with or without notice dependent on the severity of the failure.

REPORTING A PERSONAL DATA BREACH

The GDPR requires Data Controllers to notify any Personal Data Breach to the applicable regulator and, in certain instances, the Data Subject. We have put in place procedures to deal with anysuspected Personal Data Breach and will notify Data Subjects or any applicable regulator where weare legally required to do so within 72 hours.