

P2 Privacy Notice - Clients

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P2 External Document

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1 Revisions and Amendments

Version	Revision Details	Date of Issue
0.1	Initial draft by author	26/04/2018
1.0	First formal release following review.	24/05/2018
1.1	<ul style="list-style-type: none">• Registration with the ICO's office inserted.• 2018 appended to DPA reference and GDPR reference deleted.	23/05/2019
1.2	Rackspace O365 Archiving facility confirmed as having been turned off and the archive deleted.	03/07/2020

2 Privacy & Personal Data

1. In this notice, "P2" means Platinum Squared Ltd. a Registered Company in England and Wales No: 05586975, who are the data controller for all personal information processed by P2. P2 are registered as a data controller with the Information Commissioner's Office No: Z2019979
2. P2 is committed to the protection of your personal data and to complying with all applicable legislation and regulations in relation to it.

3 Information Collection and Usage

3. Personal information is collected as a consequence of bidding for work and providing Information Assurance advice, security testing, and other consultancy services. This includes any personal information provided by the client within e-mails and documentation that they have provided P2 with.
4. P2 will not sell your personal information to third-parties. P2 will not transfer your personal information to third parties except in relation to receipt of third party services as detailed above, or to specific third parties in order to comply with legal requirements.

4 Legal basis for Information Processing

5. Contract is the lawful basis of processing for the personal information collected. Processing of personal information collected from interaction with the P2 website is detailed in the Website Privacy Notice and is processed on the basis of legitimate interests.

5 Security of E-mail

6. P2 takes all reasonable precautions to protect personal information from loss, misuse, alteration or destruction and complies with all relevant UK legislation and regulations, including the Data Protection Act (DPA) 2018 and Privacy and Electronic Communications Regulations (PECR). E-mail between P2 e-mail addresses is secure. However, data transmission over the Internet from a non P2 e-mail address may not be adequately secured by the sender. As a result, P2 cannot ensure the secure receipt of any information that is sent to P2 by this medium and any such information is sent at your own risk. Data transfers will be undertaken in accordance with any formally agreed Non-Disclosure Agreements in force.

6 Use of Cookies

7. Please refer to the P2 Website Privacy Notice for details of cookie usage.

7 Third Party Transfers and Security

8. P2 utilise third-party suppliers with ISO 27001 certification to provide secure file storage and document management, e-mail services and web hosting. These services may involve transfer of data outside the EEA. However, where this does occur the suppliers have active Privacy Shield registrations. The e-mail, file storage and document management suppliers also have EU Model Contract Clauses or Binding Corporate Clauses.

9. Contact information provided to P2 for the purposes of a seminar, event or similar activity to be held by P2 may also be passed to a third-party event management company to facilitate the seminar, event or similar activity. The third-parties are not allowed to use or retain the information for any other purpose.
10. P2 are ISO 27001:2013 certified and use ISO27001 certified third-party services to store e-mails and documents. All P2 access to these services is via encrypted connections and information is encrypted at rest. These suppliers may hold your information in the USA, but they are registered as active under Privacy Shield together with either Binding Corporate Rules or approved EC Model Clauses.

8 Information Retention Period

11. The P2 retention period in relation to contracts and Non-Disclosure Agreements is 7 years after either award of contract or failure to be awarded the contract. For client documents excluding bids and contracts the retention period is 7 years after completion of the most recent piece of work, or production of documentation for the specific client. The justification for holding this information for a period of seven years is the Statute of Limitations. E-mail is not retained for a period of more than 4 years.

9 Your Rights

12. Individuals have certain rights in relation to personal information held about them. P2 will endeavour to respond to any requests without delay and within a month at most. No fee is payable to P2 for subject access requests unless the request is manifestly unfounded or excessive, particularly if it is repetitive. In those cases, the fee will be based on the amount of administrative effort involved. Where any query or request is declined, P2 will provide justification.

- **Right of Access** - Individuals have a right to obtain:
 - confirmation that their data is being processed,
 - access to their personal data.
- **Right of Correction or Completion**- Individuals have a right to:
 - have inaccurate personal data rectified or completed if it is incomplete,
 - make a request for rectification verbally or in writing.

P2 can refuse a request for rectification in certain circumstances.
- **Right of Erasure** - individuals have a right to:
 - have personal data erased,
 - make a request for erasure verbally or in writing,
 - Please note the right is not absolute and only applies in certain circumstances.
- **Right to Object to or restrict Processing** - individuals have the right to:
 - object to processing based on legitimate interests,
 - request the restriction or suppression of their personal data,
 - when processing is restricted, P2 are permitted to store the personal data, but not use it,
 - make a request for restriction verbally or in writing.

Please note that this is not an absolute right and only applies in certain circumstances.

- **Right of Data Portability**

The right to data portability allows individuals to obtain and reuse their personal data for their own purposes across different services. This right applies where the processing is based on the individual's consent or for the performance of a contract with the individual. P2 do not use profiling or automatic processing.

13. You have the right to lodge any complaints with the ICO as the UK's independent authority upholding information rights in the public interest and data privacy for individuals. See <https://ico.org.uk/>

10 Queries and Complaints

14. The first point of contact in the event of any queries or complaints in relation to your personal information held by P2 is as follows;

Email: DPO@p2.co.uk

15. Please note that we will require evidence of your identity before we can respond.

11 Changes to This Privacy Policy

16. We may update our Client Privacy Policy from time to time. You are therefore advised to review the P2 website periodically for any changes. Any changes are effective immediately they are posted on the website.