Annex B NGS Data Protection Policy 2018

NGS Privacy Notice (Tracking and Travel Management)

As the contracted Emergency Response Company, NGS has been contracted by your employer to step in at your request and provide travel management services, additional resources, crisis management and/or Emergency Response in the event of a crisis or emergency. This privacy notice explains why we're processing and sharing your personal data. At no stage will your information be used for any other purpose than what it was gained for or used in any automated profiling.
Who we are:
Northcott Global Solutions – Tracking & Travel Management Operations
Why we need to process your information
As the contracted Tracking and Travel Management company, traveller data will be processed in order to effective discharge employer's duty of care liabilities and empower each traveller with appropriate travel and risk advisories.
Legal basis for processing your information.
Consent
Contract - you need to process someone's personal data to fulfil your contractual obligations to them; or because they have asked you to do something before entering into a contract (e.g. provide a quote).
Legal Obligation - you need to process the personal data to comply with a common law or statutory obligation. You must be able to identify the legal obligation.
Vital Interests - if you need to process the personal data to protect someone's life. You cannot rely on vital interests for health data or other special category data if the individual is capable of giving consent, even if they refuse their consent.
Legitimate Interests - the most "flexible" lawful basis for processing data. There is a three- part test: a. identify a legitimate interest; b. show that the processing is necessary to achieve it; and c. balance it against the individual's interests, rights and freedoms. If you use people's data in ways they would reasonably expect and which have a minimal privacy impact, or where there is a compelling justification for the processing, then this basis works. Keep a record of all Legitimate Interests Assessments (LIAs).
Criminal Offence Data–to process personal data about criminal convictions or offences, you need to show one of the five bases above and either legal authority or official authority for the processing of such data.
Retention period
Seven Years to comply with contracted FCA Regulations
Source of the data (if not collected from the data subject)
• Client Representative (Manager/HR/Travel Management Company) • Client Contract

In which locations does the processing take place

- NGS Ops London
- Client Head Office/Regional Office
- Service Provider Tracking Platform (within the EU)
- Mass Warning and Informing system (within EU)
- Compliant backup data centres in the EU and NA1

Any regulated automated decisions taken

Proximity risk alerts / advisories based on traveller location

How we process your data and where it is held.

- Data Collection
  - Initial travel/itinerary detail
  - Situation interrogation
  - Additional information gathers
  - Consent for medical in confidence
  - Hardcopy communications portals (post/fax) will be sanitised as soon as required data is transferred to Salesforce casefile.
- Storage
  - Calls – VOIP Server – Salesforce casefile and/or account record – Secondary back-up servers
  - Emails – Mail Server – Salesforce casefile, account and contact record - Secondary back-up servers
  - Documents and Reports - Mail Server, Salesforce casefile, account and contact record - Secondary back-up servers
  - Tracking platform portal, sever and back-up server.
  - Case financials - Mail Server, Xero, Salesforce casefile, account and contact record, Word pay - Secondary back-up servers – Hard copy records
- Usage
  - Client verification
  - Travel, situation validation
  - Resolution options to pre-identified service providers
  - Client management
  - Internal/External audit
  - Accountancy functions, billing and paying
- Deletion
  - Full erasure on verified request
  - Full erasure in accordance with contractual obligations
  - Full erasure in accordance with legal obligations

What are the risks:

- Inadequate controls increase the likelihood of information being shared inappropriately
- Information which is collected and stored unnecessarily, or is not properly managed so that duplicate records are created, presents a greater security risk
- Accuracy of data subject information can pose a physical risk if out of date, incorrect or incomplete

- Third Countries outside of the EU may not be compliant with GDPR and sharing information to providers outside the EU may not provide appropriate safeguards for the protection of personal information

Data Subject Access Procedure

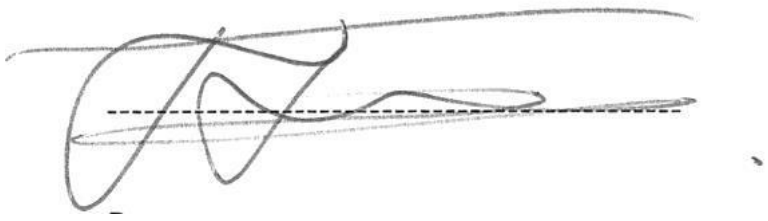
Data Subject Access Request forms (DSAR) can be downloaded from our website: www.northcottglobalsolutions.com - ***Verbal requests are not valid.**
Completed forms should be emailed to: dataprotection@northcottglobalsolutions.com
Posted to: Data Protection Officer, Northcott Global Solutions, 22 Bevis Marks, London, EC3A 7JB
Faxed to: +44 (0)207 183 8919
On receipt of completed DSAR form, NGS's Data Protection Officer will verify the request in line with GDPR regulations and action in adherence to regulations and internal policies.

As a Data subject, you have the following rights:

- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply, to have a right to restrict the processing.
- Right to object to processing – you have the right to object to certain types of processing such as direct marketing.
- Right to lodge a complaint – if you are not satisfied with how your personal data is being processed by Digital Asset Management (or third parties), or how your complaint has been handled, you may lodge a complaint directly with the supervisory authority and Digital Asset Management's CEO.
- No automated profiling will be used in the processing of your personal data. It will only be used for the purpose it was gained and human intervention is the only way NGS will process your personal information

Date: 23rd March 2018

EDWARD NORTHCOTT JONES

Signature:  CEO