
Entec Si Limited

Privacy Policy



VERSION HISTORY

Issue	Date	Section	Description of Amendment
0.1	19/02/18	All	Initial document draft
0.2	12/03/18	All	Additional information added about cookies after correspondence with 18a, our website creator
1.0	17/05/18	All	Issued for circulation
1.1	25/05/18	Data Processors of Clients' Personal Data and Entec Si's Data Processors of Employees' and Associates' data	Updates from the data processors mentioned below once their new Privacy Policies were released: <ul style="list-style-type: none"> • Smartsheet • Schofield and Associates
1.2	29/06/18	Employees' and Associates' Personal Data Processed by Entec Si	Photos/ videos sections updated to include that employees and associates may share photos of friends and family to WhatsApp, with the data subjects' consent.
1.3	25/09/18	Employees' and Associates' Personal Data Processed by Entec Si	Employees have an individual login to a Salvus Master Trust Portal, which allows individual access to their pension details. Employees have been advised to login to their password protected portal and provide a personal email address (and optional personal phone number) so that if they leave Entec Si, they will still receive correspondence about their pension.
1.4	12/11/18	Job Applicants	CVs and application information from job applicants may also be stored in a closed area on Trello.com in an area that has restricted and login access.
1.4	12/11/18	Photos/videos	Updated to state that these can be stored on the devices they were taken on.
1.6	20/05/20	Entec Si's Data Processors / Controllers of Employees' and Associates' data	WhatsApp: Added that WhatsApp is one of the Facebook Companies.
2.0	17/06/20	All	Full review and update of Data Processors / Controllers of Clients' Personal Data and Entec Si's Data Processors / Controllers of Employees' & Associates' data. Full cookie review completed. Cookie retention periods updated. Updated to explain Entec Si's approach if a project requires personal information to be processed on Entec Si systems.

3.0	27/10/21	All	Document aligned with the requirements of the UK GDPR.
3.1	05/12/22	People Who Contact Us	Update regarding website Contact Us form.
3.1	05/12/22	Data Processors / Data Controllers of clients' personal data	Update regarding Salesforce.

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1 PURPOSE OF THIS POLICY

The purpose of the Entec Si Privacy Policy is to state what should be expected when Entec Si collects personal information.

For Entec Si this applies to information collected from the following groups:

- Clients
- Suppliers
- Job applicants
- Current and past employees and associates
- People who contact us
- Visitors to our website

2 LAWFUL BASES FOR PROCESSING DATA

The UK's DPA 2018 enacted the EU GDPR's requirements into UK law and, with effect from 1 January 2021, the DPPEC (Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit)) Regulations 2019 amended the DPA 2018 and merged it with the requirements of the EU GDPR to form a new, UK-specific data protection regime that works in a UK context after Brexit as part of the DPA 2018.

The lawful bases for processing are set out in the UK GDPR. At least one of these must apply whenever personal data is processed. They are referred to in this policy:

- (a) **Consent:** the individual has given clear consent for you to process their personal data for a specific purpose.
- (b) **Contract:** the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
- (c) **Legal obligation:** the processing is necessary for you to comply with the law (not including contractual obligations).
- (d) **Vital interests:** the processing is necessary to protect someone's life.
- (e) **Public task:** the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.
- (f) **Legitimate interests:** the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.)

3 CLIENTS' PERSONAL DATA

It is our clients' responsibility to inform their staff that their data will be used by Entec Si in the ways mentioned below - it is necessary for the performance of our contract with the client. Entec Si Ltd is the data controller for the client data mentioned below. *Entec Si Ltd, Alpha Works, Alpha Tower, Suffolk Street Queensway, Birmingham, B1 1TT.* The data processors of clients' personal data are listed in the second table below.

Data type	Reason / description	Storage	Security	Lawful Bases for Processing	Retention Period
Contact name	For contact as necessary throughout the delivery of their projects	Google Drive, Outlook/Office 365/Microsoft Teams (if client is happy to use Teams) contacts and emails, Lucidchart, Salesforce, Smartsheet and Trello ¹	<ul style="list-style-type: none"> • All Entec Si laptops are password protected and encrypted. • Company mobile phones are password protected. • Further security details of each specific storage are given in section 0 <i>Data Processors / Data Controllers of Clients' Personal Data</i> 	Contractual	Up to 7 years after project closure
Business phone numbers		Outlook/Office 365 contacts/Microsoft Teams (if client is happy to use Teams), Salesforce, Entec Si employees' and associates' mobile phones			Up to 7 years after project closure
Email addresses		Outlook/Office 365 contacts/Microsoft Teams (if client is happy to use Teams), Emails, Lucidchart, Salesforce, Smartsheet and Trello ¹			Up to 7 years after project closure
Emails to and from clients which were sent during a project's lifecycle. Photos/videos.	To obtain / share /record information throughout a project's lifecycle	<p><u>Emails</u>: Entec Si employees' Outlook/Office 365 (Microsoft) email accounts.</p> <p><u>Photos/videos</u>: Vyka (videos), Entec Si website (Wordpress, 18a, Vimeo and Ammba), social media (Entec Si LinkedIn, Twitter, Hootsuite and Iszy), photos/videos are stored on the device they were taken on</p>		<p>Legitimate interests</p> <p>Consent for photos/video</p>	<p>For emails, up to 7 years after project closure in case required in a legal claim.</p> <p>Until consent is removed (for photos/videos). Note that once images have been publicly shared,</p>

¹ These companies do not pass on any information to third parties.

					they may remain in search engines.
Special category data of client employees (e.g. Staff HR data) or large-scale processing of client personal data	A project specific requirement	<p>As a rule, such data is not stored / processed on Entec Si systems – clients’ systems are used.</p> <p>However, if there is a specific project requirement for such processing, Entec Si will liaise with the client’s Data Protection Officer (or equivalent) to complete any necessary paperwork.</p> <p>Such data is stored in restricted access folders on Google Drive as well as in emails on Outlook/Office 365 (all use 2 step verification and encryption).</p>	<p>As a rule, not stored / processed on Entec Si systems – clients’ systems used</p> <p>If a specific project requires such processing on Entec Si systems, Entec Si will password protect relevant files during the project lifecycle and store files in restricted access folders on Google Drive. If files are shard on email, they will be password protected. (Google Drive/Outlook/Office 365 have 2 step verification and encryption).</p>	Contractual	2 months after project closure.

3.1 DATA PROCESSORS / DATA CONTROLLERS OF CLIENTS' PERSONAL DATA

Name of data controller or processor	Information processed	Reason / description	Storage / security / is the data shared?	Lawful Bases for Processing	Retention Period
18a (website management) <ul style="list-style-type: none"> Data processor First Floor Offices, 32 Woodborough Road, Winscombe, Bristol, BS25 1AG 	Names, photographs, videos	Company promotion	<ul style="list-style-type: none"> 18a strictly adhere to the requirements of the data protection legislation in the UK. They do not sell, rent or exchange your personal information with any third party for commercial reasons, beyond any essential requirement specified by law. Privacy statement: https://www.18aproductions.co.uk/privacy-statement Information is shared with 18a with a view to it becoming available in the public domain as web content. An 18a GDPR Agreement (May 2018) is saved in company records. 	Consent Legitimate interests	18a delete personal data on request or when it is no longer required, unless the data is required by applicable law. Information is shared with 18a with a view to it becoming available in the public domain. If consent is removed, Entec will balance the company's legitimate interest with the rights of the individual to consider if the content can still be used for company promotion.
Ammba (website and social media management) <ul style="list-style-type: none"> Data processor Victoria Works, 2a, Vittoria St, Birmingham B1 3PE 	Names, photographs, videos	Company promotion	<ul style="list-style-type: none"> Information is shared with Ammba with a view to it becoming available in the public domain. They will never sell your data to 3rd parties. Privacy Policy: https://www.reelmusic.co.uk/private_policies/privacy-policy 	Consent Legitimate interests	Information is shared with Ammba with a view to it becoming available in the public domain. Ammba can be contacted at any time to request they delete the information about you that they store. If consent is removed, Entec will balance the company's legitimate interest with the rights of the individual to consider if the content can still be used for company promotion.
Google Drive / G Suite / Google Cloud <ul style="list-style-type: none"> Data processor 	Clients' names	For contact as necessary throughout	<ul style="list-style-type: none"> Password protected. Google Drive uses data encryption and 2-step verification. Data is stored in secure data centres. 	Contractual	Up to 7 years after project closure in case required in a legal claim.

Name of data controller or processor	Information processed	Reason / description	Storage / security / is the data shared?	Lawful Bases for Processing	Retention Period
<ul style="list-style-type: none"> Google Ireland Limited, Gordon House Barrow Street, Dublin 4, Ireland (from January 2020) 	Photos/videos	the delivery of their projects and to document and report on project progress	<ul style="list-style-type: none"> Google adheres to the EU-US Privacy Shield Framework. G Suite may store & process personal data outside of the EEA. Google provide contractual commitments to enable both them (data processor) and us (data controller) to comply with UK GDPR. By signing their 'Model Contract Clauses' and 'Data Processing Amendment' we allow data to be stored/processed outside of the EEA, providing the location adopts stringent organisational & technical security measures, in accordance with applicable law. Google Privacy and Terms: https://policies.google.com/privacy?hl=en_US#infosec-urality Google Service Model in the EEA: https://www.blog.google/around-the-globe/google-europe/some-changes-our-service-model-europe/ The G Suite Standard Contractual Clauses: https://gsuite.google.com/terms/mcc_terms.html The Data Processing Amendment to G Suite: https://gsuite.google.com/terms/dpa_terms.html Google Cloud compliance: https://support.google.com/googlecloud/answer/6056694?hl=en Data retention: https://policies.google.com/technologies/retention?hl=en-US 	Legitimate interests	Once data is deleted from Google services, data may remain in encrypted back up servers for up to 6 months.
<p>Hootsuite (tool used to manage social media content)</p> <ul style="list-style-type: none"> Data processor Hootsuite Inc. 5 East 8th Avenue Vancouver, BC Canada V5T 1R6 	Photos, videos, names	To promote Entec Si	<ul style="list-style-type: none"> Data may be stored outside the EEA (Hootsuite's headquarters are in Canada). The European Commission considers Canada to be a country which provides adequate data protection. Third-party service providers are used by Hootsuite to provide the software, networking, infrastructure and other services required to operate the Services. These third-party providers may process or store personal 	Consent Legitimate interests	Most information is stored in real time from social media, so not stored on Hootsuite. The version Entec use has no inbox or analytics.

Name of data controller or processor	Information processed	Reason / description	Storage / security / is the data shared?	Lawful Bases for Processing	Retention Period
			<p>data on servers outside of the EEA and Switzerland, including in Canada or the US. The service providers are EU-US Privacy Shield / Swiss-US Privacy Shield registered or use standard contractual clauses to ensure user information is lawfully transferred under EU law.</p> <ul style="list-style-type: none"> • Hootsuite does not rent or sell user information. • Hootsuite shares limited information with their partners (sub processors) who are listed here: https://hootsuite.com/legal/subprocessor-list • Data is encrypted where possible. • Hootsuite Privacy Policy: https://hootsuite.com/en-gb/legal/privacy 		<p>If consent is removed, Entec will balance the company's legitimate interest with the rights of the individual to consider if the content can still be used for company promotion.</p>
<p>Iszy (tool used to capture and post social media content)</p> <ul style="list-style-type: none"> • Data processor First Floor Offices, 32 Woodborough Road, Winscombe, Bristol, BS25 1AG 	<p>Photos, videos, names</p>	<p>To promote Entec Si</p>	<ul style="list-style-type: none"> • Iszy is managed by 18a. • 18a strictly adhere to the requirements of the data protection legislation in the UK. • They do not sell, rent or exchange your personal information with any third party for commercial reasons, beyond any essential requirement specified by law. • Privacy statements: https://www.18aproductions.co.uk/privacy-statement https://share.iszy.ai/terms • Information is shared with 18a with a view to it becoming available in the public domain as web content. • An 18a GDPR Agreement (May 2018) is saved in company records. 	<p>Consent</p> <p>Legitimate interests</p>	<p>Images and text stay on Iszy until they are deleted by Entec Si admins. Information processed on Iszy is to be made available in the public domain.</p> <p>If consent is removed, Entec will balance the company's legitimate interest with the rights of the individual to consider if the content can still be used for company promotion.</p>
<p>LinkedIn</p> <ul style="list-style-type: none"> • Data processor LinkedIn Ireland Unlimited Company ("LinkedIn Ireland"), 70 Sir John Rogerson's 	<p>Photos/ videos / names</p> <p>news articles</p>	<p>To promote Entec Si</p>	<ul style="list-style-type: none"> • LinkedIn use two factor authentication. • They implement security safeguards such as HTTPS. • They regularly monitor their systems for possible vulnerabilities and attacks. • They adhere to the EU-US Privacy Shield Framework Principles: 	<p>Legitimate interests</p>	<p>Personal data is kept as long as a user's account is open. Data may be kept in an anonymised form after this. Information a user shared with others (e.g., through InMail, updates or</p>

Name of data controller or processor	Information processed	Reason / description	Storage / security / is the data shared?	Lawful Bases for Processing	Retention Period
Quay Dublin 2			https://www.linkedin.com/help/linkedin/answer/62533?trk=microsites-frontend_legal_privacy-policy&lang=en <ul style="list-style-type: none"> LinkedIn's Privacy Policy can be viewed here: https://www.linkedin.com/legal/privacy-policy 		group posts) will remain visible after their account is closed or after they have deleted the information from their own profile or mailbox.
Lucidchart <ul style="list-style-type: none"> Data processor 10355 S Jordan Gateway, Suite 300, South Jordan, UT 84095. 	Name, work email address	To create charts used in project delivery.	<ul style="list-style-type: none"> Lucidchart uses data encryption at rest and in transit. Lucidchart uses email encryption and anti-spoofing. All data is stored in the US. Lucidchart adheres to the EU-US Privacy Shield Framework Principles. Lucidchart's Privacy Policy can be found here: https://www.lucidchart.com/pages/privacy Lucidchart's GDPR compliance page can be found here: https://www.lucidchart.com/pages/gdpr-compliance 	Legitimate interests	Lucidchart state that after you delete information from your account, they <i>may</i> retain it for legitimate business purposes. They store backups for 6 months.
Outlook/Office 365/Microsoft Teams (Microsoft) <ul style="list-style-type: none"> Data processor Microsoft Ireland Operations Limited (data protection representative for the EEA & Switzerland): One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland 	Names, business phone numbers, business email addresses, emails to and from clients	To obtain / share information throughout the lifecycle of a project	<ul style="list-style-type: none"> A Microsoft Teams site involving staff from both the client and Entec Si is not used as standard – it is only used if it is felt it will benefit the project. 2-step verification used. Robust encryption for data in transit and data at rest. Microsoft uses the Standard Contractual Clauses (also known as the Model Clauses) as a basis for transfer of data for its enterprise online services. The Standard Contractual Clauses are standard terms provided by the European Commission that can be used to transfer data outside the European Economic Area in a compliant manner. Microsoft Corporation adheres to the principles of the EU-US Privacy Shield Framework. More information can be found here: <ul style="list-style-type: none"> https://docs.microsoft.com/en-GB/microsoft-365/compliance/gdpr?view=o365-worldwide https://privacy.microsoft.com/en-gb/privacystatement https://docs.microsoft.com/en-us/office365/Enterprise/office-365-data-retention-deletion-and-destruction-overview 	Legitimate interests Contractual	Up to 7 years after project closure. Once customer content is deleted from Outlook/Office 365/Microsoft Teams, it remains in Microsoft systems for up to 180 days. This page gives detailed retention periods: https://docs.microsoft.com/en-us/office365/Enterprise/office-365-data-retention-deletion-and-destruction-overview

Name of data controller or processor	Information processed	Reason / description	Storage / security / is the data shared?	Lawful Bases for Processing	Retention Period
			<ul style="list-style-type: none"> • https://docs.microsoft.com/en-us/microsoft-365/compliance/gdpr-data-protection-officer?view=o365-worldwide 		
Salesforce <ul style="list-style-type: none"> • Data processor • Salesforce Tower, 415 Mission Street, 3rd Floor, San Francisco, CA 94105 	Name, work email address	To record and maintain client contact information.	<ul style="list-style-type: none"> • Salesforce has robust security and privacy programmes in place that meet the highest standards in the industry. The Salesforce Services are operated in multi-tenant architecture that is designed to segregate and restrict access to Customer Data based on business needs. • Storage locations for Personal Data are described in the Infrastructure and Sub-processors Documentation. • Salesforce has a number of transfer mechanisms in place to support international transfers of Personal Data. • With respect to transfers out of Europe to non-adequate countries, Salesforce offers two mechanisms to legally transfer Personal Data: (i) Binding Corporate Rules for Processors; and (ii) Standard Contractual Clauses. For more information, please see the Salesforce’s Data Processing Addendum and the DPA FAQs and Data Transfer Mechanism FAQs. 	Legitimate interests	Unless otherwise specified in the SPARC (Security, Privacy and Architecture Documentation), Salesforce does not delete Customer Data, including Personal Data, during a subscription term, unless the Customer instructs Salesforce to do so. After a Customer’s contract with Salesforce terminates, Salesforce deletes Customer Data, including Personal Data, in the manner described in the SPARC Documentation.
Smartsheet <ul style="list-style-type: none"> • Data processor • 10500 NE 8th St, Suite 1300 Bellevue, WA 98004-4357 USA 425-324-236 	Name, work email address	To manage project delivery.	<ul style="list-style-type: none"> • Customer Content is currently stored within the United States. • Smartsheet transfers data in-line with the EU-U.S. Privacy Shield Framework. • Smartsheet’s Privacy Notice is available here (the Services Privacy Notice is relevant for this purpose): https://www.smartsheet.com/legal/privacy • Smartsheet’s sub processors: • https://www.smartsheet.com/legal/subprocessors 	Legitimate interests	Smartsheet keep your personal data for as long as reasonably necessary for the purposes set out in their privacy notices (the Services Privacy Notice is relevant for this purpose). Generally, personal data is not kept for more than 7 years after the last contact with them. Where personal data is no longer required, it is anonymised or

Name of data controller or processor	Information processed	Reason / description	Storage / security / is the data shared?	Lawful Bases for Processing	Retention Period
					disposed of in a secure manner.
Trello <ul style="list-style-type: none"> • Data processor • Atlassian B.V. c/o Atlassian, Inc. 350 Bush Street, Floor 13 San Francisco, CA 94104 	Name, work email address	It may be used to manage project delivery.	<ul style="list-style-type: none"> • Trello transfers data in-line with the EU-U.S. Privacy Shield Framework. • Trello stores user content within US regions of Amazon Web Services' EC2 platform, in secure data centres and Google Cloud Storage. • All data sent between the web, iOS, and Android apps and the Trello servers is encrypted using 128-bit Advanced Encryption Standard ("AES") encryption. • All connections are made securely over https. • Trello's data and encryption policies can be found here: https://trello.com/legal/security • The Trello Privacy Policy can be found here: https://trello.com/privacy 	Legitimate interests	While an account is active. When a Trello user account is deleted, Trello deletes the user's personal data, including items like name, email address and location, within 30 days of the request. After 30 days, such personal data will remain in encrypted Trello database backups until those backups fall out of the 90-day retention window and are completely destroyed. Some content a user provides will remain in order to allow other users to make full use of the services (i.e. comments made by a user).
Twitter <ul style="list-style-type: none"> • Data processor • Twitter International Company, Data Protection Officer, 1 Cumberland Place, Fenian Street, Dublin 2, D02 AX07, Ireland 	Name, Photographs and videos	To promote Entec Si	<ul style="list-style-type: none"> • Twitter complies with the EU-US and Swiss-US Privacy Shield Principles regarding the collection, use, sharing, and retention of personal data from the European Union and Switzerland. • Twitter's EU-US Privacy Shield Certification can be viewed here: https://www.privacyshield.gov/participant?id=a2zt0000000TORzAAO • Twitter's Privacy Policy can be viewed here: https://twitter.com/en/privacy 	Legitimate interests	Twitter keep log data for a maximum of 18 months. Even if tweets are deleted, search engines may still retain copies of your public tweets and account name.
Vimeo (videos on Entec Si website) <ul style="list-style-type: none"> • Data processor 555 West 18th Street, New York, New York 10011 	Name, videos, company bank details linked to name of an Entec Si	To promote Entec Si	<ul style="list-style-type: none"> • Vimeo may transfer personal information from your home country to the U.S. (or other countries) based upon the following legal bases: • Legitimate business interests: We could not provide our services or comply with our legal obligations 	Consent Legitimate interests	If consent for video use is removed, Entec will balance the company's legitimate interest with the rights of the individual to consider if the

Name of data controller or processor	Information processed	Reason / description	Storage / security / is the data shared?	Lawful Bases for Processing	Retention Period
	account administrator		without transferring your personal information to the U.S. <ul style="list-style-type: none"> • Our use of Standard Contractual Clauses (also known as "Model Clauses") where appropriate. • Our certification and adherence to the EU-U.S. and Swiss-U.S. Privacy Shield frameworks, as described further below. • Vimeo complies with the EU-U.S. Privacy Shield Framework. • Accounts are password protected. • https://vimeo.com/privacy 		video can still be used for company promotion. When you close an account, its data is deleted, including its videos but these items might be retained: logs of automatically collected information (for internal analytics and security purposes); email address; tax information; communications with you; and transactional information (for auditing, tax, and financial purposes). When Vimeo no longer have a business reason for retaining data, they will delete or anonymize it. Account data may be kept for longer if involved in legal process or the account has been involved in wrongdoing.
Vyka (video production) <ul style="list-style-type: none"> • Data controller • Studio 207, The Argent Centre 60 Frederick Street Birmingham B1 3HS, United Kingdom 	Name, videos	To promote Entec Si	<ul style="list-style-type: none"> • Consent forms issued and completed prior to filming. • Content of completed films is kept until consent is removed. • Note that the video content could be used for promotion of Entec Si on the following platforms (data processors): <ul style="list-style-type: none"> ○ LinkedIn ○ Twitter ○ Entec Si website (and therefore processed by Wordpress, Vimeo, Ammba and 18a) 	Consent Legitimate interests	If consent is removed, Entec will balance the company's legitimate interest with the rights of the individual to consider if the video can still be used for company promotion. Information is shared with Vyka with a view to it becoming available in the public domain.

Name of data controller or processor	Information processed	Reason / description	Storage / security / is the data shared?	Lawful Bases for Processing	Retention Period
			<ul style="list-style-type: none"> Data processing information for each of these data processors can be found in this table. 		
Wordpress (Entec Si website) <ul style="list-style-type: none"> Data processor Aut O'Mattic A8C Ireland Ltd. Business Centre, No.1 Lower Mayor Street, International Financial Services Centre, Dublin 1, Ireland 	Name, Photos/videos	Promotion of Entec Si	<ul style="list-style-type: none"> Wordpress offers two step authentication for website administrators. They monitor their services for potential vulnerabilities and attacks. Wordpress' Privacy Policy can be found here: https://automattic.com/privacy/ 	Consent Legitimate interests	When a post, page, or comment is deleted, it stays in the Trash folder for 30 days to enable restore if required. After the 30 days, deleted content stays in Wordpress' backups and caches until they are purged. If consent is removed, Entec will balance the company's legitimate interest with the rights of the individual to consider if the video can still be used for company promotion.

4 SUPPLIERS' PERSONAL DATA

Entec Si Ltd is the data controller for the supplier data mentioned below. *Entec Si Ltd, Alpha Works, Alpha Tower, Suffolk Street Queensway, Birmingham, B1 1TT.*

Data type	Reason / description	Storage	Security	Lawful Bases for Processing	Retention Period

Contact name	For contact as necessary throughout the purchase and ongoing use of a product	Google Drive, Outlook/Office 365 (Microsoft) contacts, Entec Si employees' emails	Google Drive folder has restricted access and Google Drive uses data encryption. Outlook/Office 365 (Microsoft) require login access and uses 2 factor verification.	Contractual	Up to 7 years after purchase, or longer if the product is to be used for longer than 7 years
Business phone numbers					
Email addresses					
Emails /receipts / invoices to and from suppliers	To provide proof of purchase and agreement terms	Google Drive, Entec Si employees' Outlook/Office 365 (Microsoft) emails	Google Drive financials folder has restricted access. Google Drive uses data encryption. Outlook/Office 365 (Microsoft) require login access and uses 2 factor verification.	Legal obligation	7 years

5 EMPLOYEES' & ASSOCIATES' PERSONAL DATA

Entec Si employees and associates consent to Entec Si having their personal information for HR purposes. This information is provided by the employee or associate at the start of their employment with Entec Si and might later be updated by the employee or associate to reflect a house move, change of next of kin details etc. We store names, postal addresses, phone numbers, dates of birth, National Insurance numbers, next of kin details and bank details. We also store employees' and associates' equal opportunities information (if this was provided by them at the recruitment stage), interview data and observation records from the recruitment process, performance data, review data and if necessary, disciplinary data.

Entec Si Ltd is the data controller for the employee and associate data mentioned below. *Entec Si Ltd, Alpha Works, Alpha Tower, Suffolk Street Queensway, Birmingham, B1 1TT.*

5.1 EMPLOYEES' & ASSOCIATES' PERSONAL DATA PROCESSED BY ENTEC SI

Data type	Reason / description	Storage	Security	Lawful Bases for Processing	Retention Period
Postal addresses, phone numbers, name	To process payments to employees and associates and so they can receive company correspondence	Timesheet Portal (System Management area), Google Drive financials folder	All forms of storage have restricted, login access. Google Drive uses data encryption. ²	Contractual	Up to 6 months following the end of their employment ³
Dates of birth, National Insurance numbers, bank details, name					Legal obligation
Name, photos / videos (this may include employees' and associates' friends & family if consent given by data subjects)	For company promotion	Wordpress (website), Ammba, 18a, Trello, Pearl Comms, Vyka, LinkedIn, Twitter, Hootsuite, Iszy, Google Drive photos folder, the device on which it was taken, emails on Outlook/Office 365 (Microsoft)	All forms of storage have restricted and login access. Company mobile phones are password protected. Google Drive uses data encryption ² .	Consent, Contractual or Legitimate interests. Specific to each data processor / controller – see section 5.2	See the retention periods stated for each data processor /controller in section 0. The general rule is up to 6 years after the end of their employment. If consent is the legal basis, until consent is removed.
Name, phone numbers & photos/videos of employees, associates (& their friends & family if consent given by data subjects)	To receive and supply company correspondence	WhatsApp	End-end-encryption. ²	Legitimate interests	An employees'/associates' account is deleted up to 1 week after the end of employment. It does not delete the content already on WhatsApp.
Next of kin details	For employees' and associates' wellbeing	Timesheet Portal (System Management area)	Restricted access and login required ²	Legitimate interests - documented in	Up to 3 months following the end of their employment

² Further security details for each specific data processor are given in section 5.2 *Entec Si's Data Processors of Employees' and Associates' Data*.

³ If, for a particular case, it is perceived that any of these items of personal data are needed to be kept for longer, a Legitimate Interests Assessment will be completed to justify its retention.

Data type	Reason / description	Storage	Security	Lawful Bases for Processing	Retention Period
Names / Performance data / review data / disciplinary data / interview data / observation records / email account	Company records	An individual's Entec Si Trello board, Google Drive HR folder & Practice Lead's email folder.	All forms of storage have restricted access. Google Drive uses data encryption ²	our Legitimate Interests Assessment (LIA)	Up to 6 years after the end of their employment
Emails / Microsoft Teams messages and their contents, email addresses, names	To receive and send company correspondence	Outlook/Office 365 (Microsoft) / Microsoft Teams	Login required and 2 step verification used. Microsoft complies with the EU-US Privacy Shield Framework. ²	Legitimate interests Contractual	Up to 6 years after the end of their employment
Equal opportunities information (special category data)	To produce and monitor equal opportunities statistics	Within an individual's HR folder on Google Drive	Restricted access. Google Drive uses data encryption. ²	Consent Legitimate interests	Unless consent is removed , up to 6 years after the end of their employment in case required in a legal claim
Information about your health (special category data), including medical conditions, health & sickness records, information about criminal convictions and offences	For employees' & associates' wellbeing and to produce & monitor equal opportunities statistics	Within an individual's HR folder on Google Drive	Restricted access. Google Drive uses data encryption. ²	Legitimate interests	Up to 6 years after the end of employment in case required in a legal claim
Company bank details linked to name of an Entec Si account administrator for various services, systems and tools	To process payment for required services, systems and tools	Specific to each data controller – see section 0	Specific to each data controller – see section 0	Contractual	Specific to each data controller – see section 0

5.2 ENTEC SI'S DATA PROCESSORS / CONTROLLERS OF EMPLOYEES' AND ASSOCIATES' DATA

Entec Si share our employees' and associates' personal data with the following data processors / data controllers:

Name of data controller or processor	Information processed	Reason / description	Storage / security / is the data shared?	Lawful Bases for Processing	Retention Period
18a (website management) <ul style="list-style-type: none"> Data processor First Floor Offices, 32 Woodborough Road, Winscombe, Bristol, BS25 1AG 	Names, photographs, videos	Company promotion	<ul style="list-style-type: none"> 18a strictly adhere to the requirements of the data protection legislation in the UK. They do not sell, rent or exchange your personal information with any third party for commercial reasons, beyond any essential requirement specified by law. Privacy statement: https://www.18aproductions.co.uk/privacy-statement Information is shared with 18a with a view to it becoming available in the public domain as web content. An 18a GDPR Agreement (May 2018) is saved in company records. 	Contractual Legitimate interests	Up to 7 years after termination of contract. 18a delete personal data on request or when it is no longer required, unless the data is required by applicable law. Information is shared with 18a with a view to it becoming available in the public domain.
Ambba (website and social media management) <ul style="list-style-type: none"> Data processor Victoria Works, 2a, Vittoria St, Birmingham B1 3PE 	Names, photographs, videos	<ul style="list-style-type: none"> Company promotion 	<ul style="list-style-type: none"> Information is shared with Ambba with a view to it becoming available in the public domain. They will never sell your data to 3rd parties. Privacy Policy: https://www.reelmusic.co.uk/private_policies/privacy-policy 	Contractual Legitimate interests	Information is shared with Ambba with a view to it becoming available in the public domain. Ambba can be contacted at any time to request they delete the information about you that they store.

Name of data controller or processor	Information processed	Reason / description	Storage / security / is the data shared?	Lawful Bases for Processing	Retention Period
EE <ul style="list-style-type: none"> Data processor EE is part of the BT Group, PO Box 2681, BT Centre, 81 Newgate Street, London, EC1A 7AJ 	<p>Name; company mobile number; communications with EE, including emails, webchats & calls; bills; dispute records; setting and communication preferences; information from cookies</p> <p>Company bank details linked to name of an Entec Si account administrator</p>	<ul style="list-style-type: none"> Name & company mobile number are needed to provide a company phone Communications, dispute records & bills are needed in case required in a legal claim. Records of chosen settings / communication preferences / cookies are needed for EE to provide services. 	<ul style="list-style-type: none"> The information held will be shared within the BT Group for administrative purposes. Binding corporate rules ensure suitable protection when data is transferred outside of the EEA within companies in the BT Group. Data can be passed to third parties to carry out services on BT Group's behalf. E.g. provide customer-service, marketing, infrastructure and information-technology services. If BT Group need to transfer personal information to another organisation for processing in countries that aren't listed as adequate by the European Commission, BT Group will only do so if they have model contracts or other appropriate safeguards (protection) in place. Suitable technical measures, such as encryption are used to protect personal information. We have a password protected business account with restricted access. Company Secretary (David Fisher) is the company's EE contact. All enquiries must go through him. EE's Privacy Policy can be viewed here: https://ee.co.uk/eeprivacycentre/ee-privacy-policy 	Contractual	<ul style="list-style-type: none"> Contact details are kept for 6 years after you leave EE Bills and dispute details are kept for 6 years Other items are stored for the period needed for the purpose the information was collected.
Google Drive / G-Suite / Google Account <ul style="list-style-type: none"> Data processor for items stored on 	Personal details entered for Google Account: name, email address, phone number, company bank details linked to	To enable provision of the Google Drive service.	<ul style="list-style-type: none"> Password protected. Google Drive uses data encryption and 2-step verification. Data is stored in secure data centres. Google adheres to the EU-US Privacy Shield Framework. G Suite may store & process personal data outside of the EEA. Google provide contractual commitments to 	Contractual	Once data is deleted from Google services, it may remain in encrypted backup

Name of data controller or processor	Information processed	Reason / description	Storage / security / is the data shared?	Lawful Bases for Processing	Retention Period
Google Drive / G Suite / Google Cloud. • Data controller for details processed in Google Account and credit card payment information. • Google Ireland Limited, Gordon House Barrow Street, Dublin 4, Ireland (from January 2020)	name of an Entec Si account administrator		enable both them (data processor) and us (data controller) to comply with GDPR. By signing their 'Model Contact Clauses' and 'Data Processing Amendment' we allow data to be stored/processed outside of the EEA, providing the location adopts stringent organisational & technical security measures, in accordance with applicable law. • Google Privacy and Terms: https://policies.google.com/privacy?hl=en_US#infosecurity • Google Service Model in the EEA: https://www.blog.google/around-the-globe/google-europe/some-changes-our-service-model-europe/ • The G Suite Standard Contractual Clauses can be viewed here: https://gsuite.google.com/terms/mcc_terms.html • The Data Processing Amendment to G Suite can be viewed here: https://gsuite.google.com/terms/dpa_terms.html • Google Cloud compliance: https://support.google.com/googlecloud/answer/6056694?hl=en • Data retention: https://policies.google.com/technologies/retention?hl=en-US		storage for up to 6 months.
	Postal addresses, phone numbers			Contractual	Up to 6 months following the end of employment ⁴
	Dates of birth, N.I. numbers and bank details	To process payments to employees and associates and so they can receive company correspondence			Up to 3 months following the end of employment ⁴ Once data is deleted from Google services, it may remain in encrypted backup storage for up to 6 months.
	Names; performance, review, disciplinary & interview data;	In the event of a legal claim, we can show that we have not discriminated			Legitimate interests

⁴ If, for a particular case, it is perceived that any of these items of personal data are needed to be kept for longer, a Legitimate Interests Assessment will be completed to justify its retention.

Name of data controller or processor	Information processed	Reason / description	Storage / security / is the data shared?	Lawful Bases for Processing	Retention Period
	observation records	against applicants on prohibited grounds			required in a legal claim
	Photos / videos	Promotion of Entec Si. Photos are stored to be used as required by news stories		Legitimate interests	Up to 6 years following the end of employment ⁴
	Equal opportunities information	For employees'/associates' wellbeing		Consent	Unless consent is removed , up to 6 years after the end of employment
	Information about your health, including any medical condition, health and sickness records, information about criminal convictions and offences	For employees' and associates' wellbeing, by putting support in place if necessary. To produce and monitor equal opportunities statistics		Legitimate interests	Up to 6 years after the end of their employment in case required in a legal claim
Hootsuite (tool used to manage social media content)	Those included in photo/video content: Photos, videos, names.	To promote Entec Si	<ul style="list-style-type: none"> Data may be stored outside the EEA (Hootsuite's headquarters are in Canada). The European Commission considers Canada to be a country which provides adequate data protection. 	Legitimate interests	Most information is stored in real time from social media, so not stored on

Name of data controller or processor	Information processed	Reason / description	Storage / security / is the data shared?	Lawful Bases for Processing	Retention Period
<ul style="list-style-type: none"> • Data processor for most items • Hootsuite Inc. 5 East 8th Avenue Vancouver, BC Canada V5T 1R6 	<p>Those who post content: log data (which may include IP address), usage data and general location information.</p>		<ul style="list-style-type: none"> • Third-party service providers are used by Hootsuite to provide the software, networking, infrastructure and other services required to operate the Services. These third-party providers may process or store personal data on servers outside of the EEA and Switzerland, including in Canada or the US. The service providers are EU-US Privacy Shield / Swiss-US Privacy Shield registered or use standard contractual clauses to ensure user information is lawfully transferred under EU law. • Hootsuite does not rent or sell user information. • Hootsuite shares limited information with their partners (sub processors) who are listed here: https://hootsuite.com/legal/subprocessor-list • Data is encrypted where possible. • Hootsuite Privacy Policy: https://hootsuite.com/en-gb/legal/privacy 		<p>Hootsuite. The version Entec use has no inbox or analytics.</p> <p>If consent is removed, Entec will balance the company's legitimate interest with the rights of the individual to consider if the content can still be used for company promotion.</p>
<p>HSBC UK Bank plc</p> <ul style="list-style-type: none"> • Data processor • 8 Canada Square, London E14 5HQ 	<p>Employees' names; home addresses; dates of birth; company bank details; recordings of conversations in any form, including: phone calls & video chats.</p>	<p>To issue and control company credit cards</p>	<ul style="list-style-type: none"> • HSBC state: 'Your information and information relating to individuals connected to your business may be transferred to and stored in locations outside the European Economic Area (EEA), including countries that may not have the same level of protection for personal information. When we do this, we'll ensure it has an appropriate level of protection and that the transfer is lawful.' • HSBC's privacy notice can be viewed here: https://www.hsbc.co.uk/content/dam/hsbc/gb/pdf/privacy-notice2.pdf 	<p>Legitimate interests</p>	<p>7 years from the end of their relationship with you. Some data may be retained for longer if needed to comply with regulatory or legal requirements</p>

Name of data controller or processor	Information processed	Reason / description	Storage / security / is the data shared?	Lawful Bases for Processing	Retention Period
Iszy (tool used to capture and post social media content) <ul style="list-style-type: none"> • Data processor for most items • Data controller for credit card payment information. • First Floor Offices, 32 Woodborough Road, Winscombe, Bristol, BS25 1AG 	Photos, videos, names, company bank details linked to name of an Entec Si account administrator	To promote Entec Si	<ul style="list-style-type: none"> • Iszy is managed by 18a. • 18a strictly adhere to the requirements of the data protection legislation in the UK. • They do not sell, rent or exchange your personal information with any third party for commercial reasons, beyond any essential requirement specified by law. • Privacy statements: https://www.18aproductions.co.uk/privacy-statement https://share.iszy.ai/terms • Information is shared with 18a with a view to it becoming available in the public domain as web content. • An 18a GDPR Agreement (May 2018) is saved in company records. 	Contractual Legitimate interests	Images and text stay on Iszy until they are deleted by Entec Si admins. Information processed on Iszy is to be made available in the public domain.
LinkedIn <ul style="list-style-type: none"> • Data processor • LinkedIn Ireland Unlimited Company (“LinkedIn Ireland”), 70 Sir John Rogerson's 	Photos/videos	To promote Entec Si	<ul style="list-style-type: none"> • LinkedIn use two factor authentication. • They implement security safeguards such as HTTPS. • They regularly monitor their systems for possible vulnerabilities and attacks. • They adhere to the EU-US Privacy Shield Framework Principles: https://www.linkedin.com/help/linkedin/answer/62533?trk=microsites-frontend_legal_privacy-policy&lang=en • LinkedIn’s Privacy Policy can be viewed here: https://www.linkedin.com/legal/privacy-policy 	Legitimate interests	Personal data is kept long as a user’s account is open. Data may be kept in an anonymised form after this. Information a user shared with others (e.g., through

Name of data controller or processor	Information processed	Reason / description	Storage / security / is the data shared?	Lawful Bases for Processing	Retention Period
Quay Dublin 2					InMail, updates or group posts) will remain visible after their account is closed or after they have deleted the information from their own profile or mailbox.
Lucidchart <ul style="list-style-type: none"> Data processor 10355 S Jordan Gateway, Suite 300, South Jordan, UT 84095. 	Name, work email address	To create charts used in project delivery.	<ul style="list-style-type: none"> Lucidchart uses data encryption at rest and in transit. Lucidchart uses email encryption and anti-spoofing. All data is stored in the US. Lucidchart adheres to the EU-US Privacy Shield Framework Principles. Lucidchart's Privacy Policy can be found here: https://www.lucidchart.com/pages/privacy Lucidchart's GDPR compliance page can be found here: https://www.lucidchart.com/pages/gdpr-compliance 	Legitimate interests	Lucidchart state that after you delete information from your account, they <i>may</i> retain it for legitimate business purposes. They store backups for 6 months.
MDP Accountants <ul style="list-style-type: none"> Data controller Michael Dufty Partnership Ltd, The Counting House, 	Name, home address, bank details, date of birth and National Insurance	To pay employees' and associates' wages	<ul style="list-style-type: none"> All data is stored and processed in accordance with European privacy laws. MDP's Privacy Notice states: 'All our systems have appropriate security in place that complies with all applicable legislative and regulatory requirements.' (15/05/20) 	Contractual Legal obligation	6 years from the end of their relationship with you (trigger is end

Name of data controller or processor	Information processed	Reason / description	Storage / security / is the data shared?	Lawful Bases for Processing	Retention Period
61 Charlotte Street, St Paul's Square, Birmingham B3 1PX • IRIS Software Group Limited (data processor), Heathrow Approach, 470 London Road, Slough, SL3 8QY	number, unique Tax Reference (UTR) number		<ul style="list-style-type: none"> • MDP's Privacy Policy can be viewed here: https://www.mdponline.com/privacy-notice/ • Since May 2018, a portal has been used called IRIS OpenSpace. This is password protected and can only be accessed by David Fisher (Company Secretary) and MDP employees. Monthly accounts, including details about staff wages, are uploaded and accessed on this portal – not emailed. • IRIS' privacy policy: https://www.irisopenspace.co.uk/ 		of financial year)
Outlook/Office 365 (Microsoft)/ Microsoft Teams <ul style="list-style-type: none"> • Data processor in most cases • Data controller for credit card payment information. • Microsoft Ireland Operations Limited (data protection representative for the EEA & Switzerland): One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland 	Names, business phone numbers, business email addresses, emails to and from clients, company bank details linked to name of an Entec Si account administrator	To obtain / share information throughout the lifecycle of a project	<ul style="list-style-type: none"> • 2-step verification used. • Robust encryption for data in transit and data at rest. • Microsoft uses the Standard Contractual Clauses (also known as the Model Clauses) as a basis for transfer of data for its enterprise online services. The Standard Contractual Clauses are standard terms provided by the European Commission that can be used to transfer data outside the European Economic Area in a compliant manner. • Microsoft Corporation adheres to the principles of the EU-US Privacy Shield Framework. • More information can be found here: • https://docs.microsoft.com/en-GB/microsoft-365/compliance/gdpr?view=o365-worldwide • https://privacy.microsoft.com/en-gb/privacystatement • https://docs.microsoft.com/en-us/office365/Enterprise/office-365-data-retention-deletion-and-destruction-overview • https://docs.microsoft.com/en-us/microsoft-365/compliance/gdpr-data-protection-officer?view=o365-worldwide 	Contractual Legitimate interests	Up to 6 years after the end of employment. Once customer content is deleted from Outlook/Office 365, it remains in Microsoft systems for up to 180 days. This page gives detailed retention periods: https://docs.microsoft.com/en-us/office365/Enterprise/office-365-data-retention-deletion-and-destruction-overview

Name of data controller or processor	Information processed	Reason / description	Storage / security / is the data shared?	Lawful Bases for Processing	Retention Period
Pearl Comms <ul style="list-style-type: none"> Data processor Alpha Tower, Floor 21, Birmingham, B1 1TT 	Names, photos, company email addresses	Company promotion	<ul style="list-style-type: none"> They will not sell, distribute or lease personal information to third parties unless permission is given, or they are required by law to do so. Privacy Policy: https://www.pearl-comms.com/privacy 	Contractual Legitimate interests	Not specified Information is shared with Pearl Comms with a view to it becoming available in the public domain
Salvus Master Trust (pension scheme) <ul style="list-style-type: none"> Data controller The Salvus Master Trust HS Administrative Services Ltd 25 Goodlass Road Liverpool LS24 9HJ 	Name, home address, gender, Employment start date/length of service, pension enrolment date, salary, bank & tax details, date of birth, N.I. number; family, dependants; marital status; health information to assess eligibility for benefits	To have a workplace pension, which must now be provided by law	<ul style="list-style-type: none"> All employees have an individual login to a secure online portal. Once they have their individual portal login, employees are asked to update their details to include a personal email address (and phone number if they wish) so that if they leave Entec Si, they will still receive correspondence about their pension. Personal data is shared with The Scheme's banks, currently Barclays, as well as other advisers and services, mentioned in their Privacy Policy. In the unlikely event that personal data is transferred outside the EEA, appropriate safeguards must be implemented with a view to protecting the data in accordance with applicable laws. Their Privacy Policy can be viewed here: https://www.salvustrust.com/privacy-policy.php 	Legal obligation	They retain your data for such period as you (or any beneficiary who receives benefits after your death) are entitled to benefits from the Scheme and for so long afterwards as may be required to deal with any questions, complaints or claims that they may receive about their administration of the Scheme. They may also retain your data for a longer period to

Name of data controller or processor	Information processed	Reason / description	Storage / security / is the data shared?	Lawful Bases for Processing	Retention Period
	payable on ill health, or when your health is relevant to a claim for benefits; criminal conviction details if it has resulted in you owing money to your employer; personal email addresses and phone numbers				comply with their legal and regulatory obligations.
Schofield and Associates (HR) ⁵ • Data processor Schofield & Associates, Employment Lawyers, The Corn Exchange, 14 Station Road, Knowle, B93 0HT	Name and performance review information.	To solve HR issues, such as maternity pay advice	<ul style="list-style-type: none"> • During the client matter, all paper files are locked away in cabinets. All electronic documents, emails etc are stored on encrypted IT systems. Once client matter is completed, all paper files are transferred to Schofield and Associates' secure storage unit. All electronic documents, emails etc remain stored on encrypted IT systems. • Data may be stored outside the EEA in 'the Cloud'. If they transfer or store personal data outside the EEA, they will take steps with the aim of ensuring that our privacy rights continue to be protected, as outlined in their privacy policy and in accordance with the DPA and GDPR. 	Legitimate interests	All client matters are retained for 6 years following the completion of the matter. Paper files are destroyed via Shred-It, a confidential shredding company, all

⁵ Used on an ad-hoc basis.

Name of data controller or processor	Information processed	Reason / description	Storage / security / is the data shared?	Lawful Bases for Processing	Retention Period
			<ul style="list-style-type: none"> Their privacy policy can be viewed here: http://www.schofieldandassociates.co.uk/privacy-policy/ 		electronic files are irrevocably deleted from IT systems.
Smartsheet <ul style="list-style-type: none"> Data processor 10500 NE 8th St, Suite 1300 Bellevue, WA 98004-4357 USA 425-324-236 	Name, work email address	To manage project delivery.	<ul style="list-style-type: none"> Customer Content is currently stored within the United States. Smartsheet transfers data in-line with the EU-U.S. Privacy Shield Framework. Smartsheet's Privacy Notice is available here (the Services Privacy Notice is relevant for this purpose): https://www.smartsheet.com/legal/privacy Smartsheet's sub processors: https://www.smartsheet.com/legal/subprocessors 	Legitimate interests	Smartsheet keep your personal data for as long as reasonably necessary for the purposes set out in their privacy notices (the Services Privacy Notice is relevant for this purpose). Generally, personal data is not kept for more than 7 years after the last contact with them. Where personal data is no longer required, it is anonymised or disposed of in a secure manner.
Timesheet Portal <ul style="list-style-type: none"> Data processor Data controller for credit card 	Name, work email address, time spent on projects at Entec Si, company bank details linked to name of an Entec Si	Company administration – booking time to projects.	<ul style="list-style-type: none"> Login access Areas containing employees' next of kin details have restricted access Data is not transferred outside the EEA unless required to do so under applicable law, in which case Anfold Software Ltd/ Timesheet Portal will inform Entec Si of that legal requirement before processing unless 	Legitimate interests	Once deleted, data may remain on back-up servers for up to 3 months before

Name of data controller or processor	Information processed	Reason / description	Storage / security / is the data shared?	Lawful Bases for Processing	Retention Period
payment information. • Anfold Software Ltd, 42A Raynham Road, London W6 0HY	account administrator Next of kin details	Employees' wellbeing.	the law prohibits such information on important grounds of public interest. • Privacy notice available within Timesheet Portal (login access)		deletion is completed.
Trello • Data processor • Data controller for credit card payment information. Atlassian B.V. c/o Atlassian, Inc. 350 Bush Street, Floor 13 San Francisco, CA 94104	Name, work email address, company bank details linked to name of an Entec Si account administrator	To pass on company information and to store some performance data. It may be used to manage project delivery.	<ul style="list-style-type: none"> • Trello transfers data in-line with the EU-U.S. Privacy Shield Framework. • Trello stores user content within US regions of Amazon Web Services' EC2 platform, in secure data centres and Google Cloud Storage. • All data sent between the web, iOS, and Android apps and the Trello servers is encrypted using 128-bit Advanced Encryption Standard ("AES") encryption. • All connections are made securely over https. • Trello's data and encryption policies can be found here: https://trello.com/legal/security • The Trello Privacy Policy can be found here: https://trello.com/privacy 	Legitimate interests	While an account is active. When a Trello user account is deleted, Trello deletes the user's personal data, including items like name, email address and location, within 30 days of the request. After 30 days, such personal data will remain in encrypted Trello database backups until those backups fall out of the 90-day retention window and are completely destroyed. Some content a user provides will remain in order

Name of data controller or processor	Information processed	Reason / description	Storage / security / is the data shared?	Lawful Bases for Processing	Retention Period
					to allow other users to make full use of the services (i.e. comments made by a user).
Twitter <ul style="list-style-type: none"> Data processor Twitter International Company, Data Protection Officer, 1 Cumberland Place, Fenian Street, Dublin 2, D02 AX07, Ireland	Name, Photographs and videos	To promote Entec Si	<ul style="list-style-type: none"> Twitter complies with the EU-US and Swiss-US Privacy Shield Principles regarding the collection, use, sharing, and retention of personal data from the European Union and Switzerland. Twitter's EU-US Privacy Shield Certification can be viewed here: https://www.privacyshield.gov/participant?id=a2zt0000000TORzAAO Twitter's Privacy Policy can be viewed here: https://twitter.com/en/privacy 	Legitimate interests	Twitter keep log data for a maximum of 18 months. Even if tweets are deleted, search engines may still retain copies of your public tweets and account name.
Vimeo (videos on Entec Si website) <ul style="list-style-type: none"> Data processor 555 West 18th Street, New York, New York 10011	Name, videos, company bank details linked to name of an Entec Si account administrator	To promote Entec Si	<ul style="list-style-type: none"> Vimeo may transfer personal information from your home country to the U.S. (or other countries) based upon the following legal bases: Legitimate business interests: We could not provide our services or comply with our legal obligations without transferring your personal information to the U.S. Our use of Standard Contractual Clauses (also known as "Model Clauses") where appropriate. Our certification and adherence to the EU-U.S. and Swiss-U.S. Privacy Shield frameworks, as described further below. Vimeo complies with the EU-U.S. Privacy Shield Framework. 	Legitimate interests	When you close an account, its data is deleted, including its videos but these items might be retained: logs of automatically collected information (for internal analytics and security purposes); email address; tax information; communications

Name of data controller or processor	Information processed	Reason / description	Storage / security / is the data shared?	Lawful Bases for Processing	Retention Period
			<ul style="list-style-type: none"> • Accounts are password protected. • https://vimeo.com/privacy 		with you; and transactional information (for auditing, tax, and financial purposes). When Vimeo no longer have a business reason for retaining data, they will delete or anonymize it. Account data may be kept for longer if involved in legal process or the account has been involved in wrongdoing.
<p>Vyka (video production)</p> <ul style="list-style-type: none"> • Data controller • Studio 207, The Argent Centre 60 Frederick Street Birmingham B1 3HS, United Kingdom 	Name, videos	To promote Entec Si	<ul style="list-style-type: none"> • Consent forms issued and completed prior to filming. • Content of completed films is kept until consent is removed. • Note that the video content could be used for promotion of Entec Si on the following platforms (data processors): <ul style="list-style-type: none"> ○ LinkedIn ○ Twitter ○ Entec Si website (and therefore processed by Wordpress, Vimeo, Ammba and 18a) • Data processing information for each of these data processors can be found in this table. 	Consent Legitimate interests	If consent is removed, Entec will balance the company's legitimate interest with the rights of the individual to consider if the video can still be used for company promotion. Information is shared with Vyka with a view to it becoming

Name of data controller or processor	Information processed	Reason / description	Storage / security / is the data shared?	Lawful Bases for Processing	Retention Period
					available in the public domain.
<p>WhatsApp</p> <ul style="list-style-type: none"> • Data controller WhatsApp Ireland Limited, 4 Grand Canal Square Grand Canal Harbour Dublin 2 Ireland 	Name, Phone number, photos/videos	For company correspondence	<ul style="list-style-type: none"> • End-end-encryption • WhatsApp has certified to the EU-U.S. Privacy Shield Framework • WhatsApp is one of the Facebook Companies. • WhatsApp works and shares information with the other Facebook Companies to receive services like infrastructure, technology, and systems that help provide and improve WhatsApp and to keep WhatsApp and Facebook Companies safe and secure. Working together allows the Facebook companies to: <ul style="list-style-type: none"> ○ Provide you fast and reliable messaging and calls around the world. ○ Understand how our services and features are performing. ○ Ensure safety and security across WhatsApp and the Facebook Company Products by removing spam accounts and combatting abusive activity. ○ Connect your WhatsApp experience with Facebook Company Products. For example, you could share a link to a post from Facebook to a WhatsApp chat. ○ Enable you to communicate with businesses on WhatsApp. For example, if you visit a business's Facebook page, you might see a button that lets you easily open a WhatsApp chat with them. • WhatsApp utilise standard contract clauses approved by the European Commission • WhatsApp's Privacy notice: https://www.whatsapp.com/privacy 	Legitimate interests	20/05/20: No specific data retention period stated. When a WhatsApp account is deleted, undelivered messages are deleted from servers along with any other information no longer needed to operate and provide WhatsApp's services. If only WhatsApp services are deleted from a device without using the in-app 'delete my account feature', information may be stored by WhatsApp for a longer period. Deletion of an account does not delete the data others have on you, such as photos and messages.

Name of data controller or processor	Information processed	Reason / description	Storage / security / is the data shared?	Lawful Bases for Processing	Retention Period
			<ul style="list-style-type: none"> • WhatsApp Privacy Policy: https://www.whatsapp.com/legal/#privacy-policy • Standard contract clauses: https://www.facebook.com/help/566994660333381 • Facebook companies (WhatsApp is one such company) https://www.facebook.com/help/111814505650678 		
<p>Wordpress (Entec Si website)</p> <ul style="list-style-type: none"> • Data processor Aut O'Mattic A8C Ireland Ltd. Business Centre, No.1 Lower Mayor Street International Financial Services Centre Dublin 1, Ireland 	Name, Photos/videos	Promotion of Entec Si	<ul style="list-style-type: none"> • Wordpress offers two step authentication for website administrators. • They monitor their services for potential vulnerabilities and attacks. • Wordpress' Privacy Policy can be found here: https://automattic.com/privacy/ 	Legitimate interests	When a post, page, or comment is deleted, it stays in the Trash folder for 30 days to enable restore if required. After the 30 days, deleted content stays in Wordpress' backups and caches until they are purged.



6 APPLICANTS' PERSONAL DATA PROCESSED BY ENTEC SI

Entec Si is the data controller for the personal data provided by individuals during the application process. *Entec Si Ltd, Alpha Works, Alpha Tower, Suffolk Street Queensway, Birmingham, B1 1TT.* Entec Si do not collect more information than is needed to fulfil their stated purposes and will not retain it for longer than is necessary. The information asked for is used to assess an applicant's suitability for employment. An applicant does not *have* to provide the information asked for, but it might affect their application if they do not.

Entec Si will not share any of the information provided during the recruitment process with third parties for marketing purposes or store any of the information outside of the European Economic Area. The information provided by applicants will be held securely by Entec Si whether the information is in electronic or physical format.

GSA Techsource and Harvey Nash recruitment agencies may pass applicants' data to us. Such data will be held as per the details and retention periods below. They pass on the following items of personal data, provided by the applicant: curriculum vitae, covering letter, name, title, address, telephone number, personal email address, date of birth, gender, employment history and qualifications.

6.1 JOB APPLICANTS' PERSONAL DATA PROCESSED BY ENTEC SI AT THE APPLICATION STAGE

Data type	Provided on	Reason / description	Storage/ security	Lawful Bases for Processing	Retention Period
Name, title, address, telephone number, personal email address, date of birth, gender	Application form, cv or covering letter	To process the application	Within an individual's 'Job Applicants' folder on Google Drive and on a recruitment event's Trello board (if applicable) – both have restricted and login access	Legitimate interests - documented in our Legitimate Interests Assessment (LIA)	6 months after the end of the recruitment campaign
Employment history, education, qualifications and right to work in the UK	Application form, cv, covering letter, information provided in assessment days and interviews	To assess an applicant's suitability for the role			
Observation records created by Entec Si employees	Assessment days and interviews	To assess an applicant's suitability for the role			
Photographs/videos	Assessment days	To promote the assessment day on the Entec Si website / social media	Google Drive Photographs folder and if consented, Wordpress Media Library for website. (Both restricted access). The device on which it was taken. If consented, Twitter/LinkedIn.	Consent	Unless consent is removed , 6 months after the end of the recruitment campaign. If the job applicant is successful and the offer is accepted,
Equal opportunities information	Application form	To produce and monitor equal opportunities statistics	Within an individual's 'Job Applicants' folder on Google Drive - restricted access	Consent	

Data type	Provided on	Reason / description	Storage/ security	Lawful Bases for Processing	Retention Period
Information about your health, including any medical condition, health and sickness records	Application form	To help ensure an individual's wellbeing, by putting support in place if necessary and to produce and monitor equal opportunities statistics	Within an individual's 'Job Applicants' folder on Google Drive - restricted access	Consent	employee / associate retention periods apply

6.2 JOB APPLICANTS' PERSONAL DATA PROCESSED BY ENTEC SI WHEN A JOB OFFER IS MADE

Data type	Provided on	Reason / description	Storage	Security	Lawful Bases for Processing	Retention Period
Proof of identity	Original documents which are copied: passport & driving licence	To confirm an applicant's identity	Within an individual's 'Job Applicants' folder on Google Drive - restricted access	Restricted access	Contractual	If unsuccessful or if the applicant does not accept the offer, 6 months after the end of the recruitment campaign. If successful,
Proof of qualifications	Original documents which are copied	To confirm an applicant's suitability for the role				
Referee details	Provided by job applicant via email to David Fisher					
Basic Criminal Record check	Disclosure and Barring Service form	To set up payment				
Bank details - Sort code, account number, bank name and address	Provided by applicant on an appendix to their contract					
Next of kin details: name, relationship to staff member and phone number	Provided by applicant on their signed copy of their contract	To help ensure an individual's wellbeing				

Data type	Provided on	Reason / description	Storage	Security	Lawful Bases for Processing	Retention Period
A higher level of security clearance is needed for some roles	Provided by the applicant via the National Security Vetting process. HMRC will be the data controller for this information	To ensure an individual's suitability for a role				employee / associate retention periods apply
Health questionnaire - Information about your health, including any medical condition, health and sickness records	Provided by applicant on an appendix to their contract	To help ensure an individual's wellbeing, putting support in place if necessary. To produce and monitor equal opportunities statistics			Consent Legitimate interests	

7 PEOPLE WHO CONTACT US

Form of Contact	Comment	Retention Period
Email	<p>Any email and attachments received by Entec Si may be monitored and used by us for security reasons and for monitoring compliance with office policy. Email monitoring or blocking software may also be used. It is the responsibility of the sender of an email to Entec Si to ensure it is within the bounds of the law.</p> <p>Contact made via the website Contact Us form is only held by Entec Si. Entec Si will not share any of the information provided with any third party or store any of the information outside of the European Economic Area. The information provided will be held securely by Entec Si.</p> <p>If you have ticked the opt in box on a free consultation offer for email marketing, we may send you electronic marketing information via your email address, in the future. This would include information about the latest news about Entec Si. Please note that we are currently not sending email marketing and do not have an affiliation with an email marketing provider. Should we begin email marketing, we will send you an email to confirm that you would like to still opt in to receive emails from us and update this privacy policy accordingly. When opting into email marketing from the free consultation form, your details will be stored in Salesforce, our customer relationship management database.</p>	Up to 6 years in case required to defend a legal claim.
Via social media	Remember that even when public messages are deleted, search engines may still retain copies of your public messages and account name.	<ul style="list-style-type: none"> • LinkedIn: Personal data is kept long as a user's account is open. Data may be kept in an anonymised form after this. Information a user shared with others (e.g., through InMail, updates or group posts) will remain visible after their account is closed or after they have deleted the information from their own profile or mailbox.

		<ul style="list-style-type: none"> • Twitter: Twitter keep log data for a maximum of 18 months. Even if tweets are deleted, search engines may still retain copies of your public tweets and account name.
People who call us including conference calls	We do not record phone calls or conference calls. If we wish to record your call for any reason, such as to generate meeting minutes from a conference call, we will inform you first.	As long as necessary, such as until meeting minutes have been produced. Usually no more than 1 month.
People who make a complaint to us	<p>A file containing the details of the complaint is created in a restricted area of Google Drive. This includes the nature of the complaint and the names of the people involved (including the name of the person who made the complaint). If asked to keep the identity of the person who raised the complaint anonymous, efforts will be made to do this, but it often is not possible, as anyone who has a complaint raised against them will need to be investigated and in doing this the context of the complaint will often need to be shared.</p> <p>The personal information provided when a complaint is raised is used by Entec Si to process the complaint and to check on the level of service we provide.</p> <p>We may need to share details of the complaint with our HR data processor, Schofield and Associates. Every effort will be made to discuss the complaint in a form that does not identify anyone, but this may not be possible.</p>	<p>Up to 6 years after complaint closure, in case required to defend a legal claim.</p> <p>It will be retained in a secure environment and will only be accessed according to the 'need to know' principle.</p>

8 VISITORS TO OUR WEBSITE

Our website (www.entecsi.com) uses cookies.

It is possible for visitors to the website to turn cookies off and control which ones you allow. The process depends on the browser used (such as Firefox, Google Chrome or Internet Explorer). This website gives instructions on how to control or delete cookies on the various browsers: <https://www.aboutcookies.org/how-to-control-cookies/>

Cookies are used by our website as detailed below (**last updated on 27/05/20**):

Cookie	Purpose	Extra Details	Does it identify anyone?	Retention Period
Entec Si PHPSESS ID	Essential cookie When our website first loads, this cookie is used. This cookie establishes a user session.	N/a	No	It disappears when our website is closed
The Web Guild wg_cookie ci_session PHPSESS ID	Essential cookies • The Web Guild places cookies on our website. This is because 18a Productions, who created our website, are members of The Web Guild. They have to meet certain criteria of good practice to be a Web Guild member, so the Web Guild cookies are to show that our website has been created using the highest standards. <ul style="list-style-type: none"> ○ ci_session and PHPSESSID allow the site to identify a unique user visit. ○ wg_cookie is for our cookies privacy notice which is displayed at the bottom of our website when you first login. 	For more information about The Web Guild's cookies, please visit: https://www.thewebguild.org/privacy-policy	No	<ul style="list-style-type: none"> • ci_session and PHPSESSID disappear when our website is closed • wg_cookie expires after 12 months
Google Analytics • _ga • _gid • _gat	Performance cookies • We use IP anonymisation in Google Analytics. • Google Analytics collects standard internet log information and details of visitor behaviour patterns.	• The best place for up-to-date information about Google Analytics' cookies, is Google's website:	No	<ul style="list-style-type: none"> • _ga expires after 24 months • _gid expires after 24 hours of inactivity

Cookie	Purpose	Extra Details	Does it identify anyone?	Retention Period
	<ul style="list-style-type: none"> o ga and _gid help us to find out how many people have visited various parts of our website. o _gat is used to limit the collection of data on high traffic websites. 	https://www.google.com/policies/technologies/ads/#toc-analytics <ul style="list-style-type: none"> • To opt out of being tracked by Google Analytics across all websites, visit: https://tools.google.com/dlpage/gaoptout. 		<ul style="list-style-type: none"> • _gat expires after 1 minute
Google Maps <ul style="list-style-type: none"> • 1P_JAR • CONSENT • NID 	Performance cookies Our 'Contact us' page (https://entecsi.com/contact-us/) contains a Google Map. Google Maps store cookies of your preferences and user information. <ul style="list-style-type: none"> o 1P_JAR is a Google Analytics cookie o CONSENT captures Google cookie tracking preferences. o NID helps Google remember your preferences 	The best place for up-to-date information about Google Maps' cookies, is Google's website: https://www.google.com/policies/technologies/ads/#toc-analytics	Enough information is stored to enable tracking	<ul style="list-style-type: none"> • 1P_JAR expires after 1 month • CONSENT expires after 18 years • NID expires after 6 months
Vimeo <ul style="list-style-type: none"> • _vuid • _fbp • _ga • _gid • _gcl_au • _gcl_dc • Player • _qca • _sd_client-id • _ssid • _uetsid 	Performance cookies <ul style="list-style-type: none"> • A few pages on our website contain videos powered by Vimeo. • Before you play a video on our website, the only Vimeo cookie will be _vuid. <ul style="list-style-type: none"> o _vuid allows Entec Si to obtain statistics about the players' performance on their website through this cookie. • Vimeo store cookies of your preferences (language, volume and HD mode), to keep you logged in as you move between websites and cookies to report analytics data. • It is the user's choice (EU users) to opt into use of non-essential Vimeo cookies. There is a consent box at the bottom of this webpage: https://vimeo.com/cookie_policy 	For more information about Vimeo's cookies (and to give consent if you wish to use non-essential Vimeo cookies) visit: https://vimeo.com/cookie_policy	No	<ul style="list-style-type: none"> • _vuid expires after 18 months • ga expires after 24 months • _gid expires after 12 months • _gcl_au expires after 3 months • gcl_dc expires after 3 months • Player expires after 12 months • _qca expires after 13 months

Cookie	Purpose	Extra Details	Does it identify anyone?	Retention Period
<ul style="list-style-type: none"> • _uetmsclkid • Vimeo_gdpr_optin 	<ul style="list-style-type: none"> ○ _fbp - Facebook marketing and tracking ○ _ga - Google Analytics cookie ○ _gid - Google Analytics cookie. ○ _gcl_aud - Google Tag Manager – website statistics ○ _gcl_dc - Google Tag Manager – website statistics ○ _ssid - Google Ads optimisation ○ Vimeo_gdpr_optin - GDPR consent (non-essential cookie opt-in) ○ Specific information about the cookies: Player, sd_client-id, _uetmsclkid, _qca and _uetid could not be found but it is thought that they are used to store video preferences / track audience reach. 			<ul style="list-style-type: none"> • _fbp expires after 3 months • _sd_client-id expires after 2 years • _ssid expires after 10 years • uetmsclkid expires after 3 months • uetid expires after 1 day • Vimeo_gdpr_optin expires after 10 years

9 ACCESS TO PERSONAL INFORMATION

For any personal or sensitive data held by Entec Si, individuals can:

- request to rectify any inaccurate or incomplete data Entec Si store and restrict its processing
- request portability of data so it is provided in a in a structured, commonly used and machine-readable form
- object to processing based on ‘grounds relating to your particular situation’ where the lawful basis is legitimate interest
- withdraw consent to store or process your data

If Entec Si receive a request from an individual to exercise one of their GDPR rights, Entec Si will reply to it within one month.

Entec Si’s responses to each specific GDPR right’s request can be viewed in the *Entec Si Privacy Standard*, available on request.