

# Privacy Policy

Reviewed: January 2023

## Introduction

A new data protection law was enforced on 25th May 2018. The European Union General Data Protection Regulation (EU GDPR) replaces the actual Directive (Data Protection Directive 95/46/EC) and in line with this change 3-Space (UK) Ltd have reproduced a new privacy policy. We want to do our very best to continue to be responsible and compliant, by managing your information with care whilst ensuring you know exactly how we use and protect your information. We have updated all our data protection policy and procedures to reflect the new requirements. It assures us that we are continuing to comply with privacy law and regulations.

3-Space (UK) Ltd is committed to being transparent about how it collects and uses the personal data of its contacts and workforce, and to meeting its data protection obligations. This policy sets out the Company's commitment to data protection, and individual rights and obligations in relation to personal data.

This policy applies to the personal data of any individual who can be identified from that information.

In order for 3-Space (UK) Ltd to manage this suitably, we are sending, as a main client, contractor, supplier or employee contact in our professional relationship this information as this policy applies to the personal data of job applicants, employees, workers, contractors, volunteers, interns, apprentices and former employees, referred to as HR-related personal data. It does not apply to the personal data of clients or other personal data processed for business purposes.

As part of our professional relationship we may process customer names and address data for persons connected with you (for example client data in relation to sales and marketing correspondence, professional business contact information, corporate certifications, qualifications etc.).

Please ensure that any connected individuals for whom we may process data on your behalf as part of our professional relationship are made aware of our role and our Privacy policy.

You may wish to read our privacy policy that provides additional information about how we use your personal data. Questions about this policy, or requests for further information, should be directed to the Directors.

If you have any questions, please contact: [kathryn.lowe@3-spaceuk.com](mailto:kathryn.lowe@3-spaceuk.com)

At 3-Space (UK) Ltd we routinely collect and use personal data about individuals, including clients, sub-contractors and suppliers and website, app and social media users ("you"). We are aware of our responsibilities to handle your personal data with care, to keep it secure and comply with applicable privacy and data protection laws.

## About this policy

The purpose of this policy is to provide a clear explanation of when, why and how we collect and use information which may relate to you ("personal data").

We have designed this Policy to be as user friendly as possible.

Please read this Policy with care. It provides important information about how we use personal data and explains your statutory rights. This Policy is not intended to override the terms of any contract you have with us, nor rights you might have available under applicable data protection laws.

## Privacy Policy

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### 1. Data protection principles

The Company processes personal data in accordance with the following data protection principles:

- The Company processes personal data lawfully, fairly and in a transparent manner.
- The Company collects personal data only for specified, explicit and legitimate purposes.
- The Company processes personal data only where it is adequate, relevant and limited to what is necessary for the purposes of processing.
- The Company keeps accurate personal data and takes all reasonable steps to ensure that inaccurate personal data is rectified or deleted without delay.
- The Company keeps personal data only for the period necessary for processing.
- The Company adopts appropriate measures to make sure that personal data is secure, and protected against unauthorised or unlawful processing, and accidental loss, destruction or damage.

The Company tells individuals the reasons for processing their personal data, how it uses such data and the legal basis for processing in its privacy notices. It will not process personal data of individuals for other reasons. Where the Company processes special categories of personal data or criminal records data to perform obligations or to exercise rights in employment law, this is done in accordance with a policy on special categories of data and criminal records data.

The Company will update data promptly if an individual/company advises that his/her/their information has changed or is inaccurate.

Personal data gathered during the employment, worker, contractor or volunteer relationship, or apprenticeship or internship is held in the individual's personnel file (in hard copy or electronic format, or both), and on HR systems. The periods for which the Company holds HR-related personal data are contained in its privacy notices to individuals.

The Company keeps a record of its processing activities in respect of personal data in accordance with the requirements of the General Data Protection Regulation (GDPR).

### 2. Individual rights

As a data subject, individuals have a number of rights in relation to their personal data.

#### *Subject access requests*

Individuals have the right to make a subject access request. If an individual makes a subject access request, the Company will tell him/her:

- whether or not his/her data is processed and if so why, the categories of personal data concerned and the source of the data if it is not collected from the individual;
- to whom his/her data is or may be disclosed, including to recipients located outside the European Economic Area (EEA) and the safeguards that apply to such transfers;
- for how long his/her personal data is stored (or how that period is decided);
- his/her rights to rectification or erasure of data, or to restrict or object to processing;
- his/her right to complain to the Information Commissioner if he/she thinks the Company has failed to comply with his/her data protection rights; and
- whether or not the Company carries out automated decision-making and the logic involved in any such decision-making.

The Company will also provide the individual with a copy of the personal data undergoing processing. This will normally be in electronic form if the individual has made a request electronically, unless he/she agrees otherwise. If the individual wants additional copies, the Company will charge a fee, which will be based on the administrative cost to the Company of providing the additional copies.

To make a subject access request, the individual should send the request to the Directors. In some cases, the Company may need to ask for proof of identification before the request can be processed. The Company will inform the individual if it needs to verify his/her identity and the documents it requires.

The Company will normally respond to a request within a period of one month from the date it is received. In some cases, such as where the Company processes large amounts of the individual's data, it may respond within three months of the date the request is received. The Company will write to the individual within one month of receiving the original request to tell him/her if this is the case.

If a subject access request is manifestly unfounded or excessive, the Company is not obliged to comply with it. Alternatively, the Company can agree to respond but will charge a fee, which will be based on the administrative cost of responding to the request. A subject access request is likely to be manifestly unfounded or excessive where it repeats a request to which the Company has already responded. If an individual submits a request that is unfounded or excessive, the Company will notify him/her that this is the case and whether or not it will respond to it.

#### ***Other rights***

Individuals have a number of other rights in relation to their personal data. They can require the Company to:

- rectify inaccurate data;
  - stop processing or erase data that is no longer necessary for the purposes of processing;
  - stop processing or erase data if the individual's interests override the Company's legitimate grounds for processing data (where the Company relies on its legitimate interests as a reason for processing data);
  - stop processing or erase data if processing is unlawful; and
  - stop processing data for a period if data is inaccurate or if there is a dispute about whether or not the individual's interests override the Company's legitimate grounds for processing data.
- To ask the Company to take any of these steps, the individual should send the request to the Directors.

### **3. Data security**

The Company takes the security of HR-related personal data seriously. The Company has internal policies and controls in place to protect personal data against loss, accidental destruction, misuse or disclosure, and to ensure that data is not accessed, except by employees in the proper performance of their duties.

Where the Company engages third parties to process personal data on its behalf, such parties do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and Company measures to ensure the security of data.

### **4. International data transfers**

The Company will not transfer HR-related personal data to countries outside the EEA.

## 5. Individual Responsibilities

Individuals may have access to the personal data of other individuals and of our customers and clients in the course of their employment, contract, volunteer period, internship or apprenticeship. Where this is the case, the Company relies on individuals to help meet its data protection obligations to staff and to customers and clients.

Individuals who have access to personal data are required:

- to access only data that they have authority to access and only for authorised purposes;
- not to disclose data except to individuals (whether inside or outside the Company) who have appropriate authorisation;
- to keep data secure (for example by complying with rules on access to premises, computer access, including password protection, and secure file storage and destruction);
- not to remove personal data, or devices containing or that can be used to access personal data, from the Company's premises without adopting appropriate security measures (such as encryption or password protection) to secure the data and the device; and
- not to store personal data on local drives or on personal devices that are used for work purposes.
- Failing to observe these requirements may amount to a disciplinary offence, which will be dealt with under the Company's disciplinary procedure. Significant or deliberate breaches of this policy, such as accessing employee or customer data without authorisation or a legitimate reason to do so, may constitute gross misconduct and could lead to dismissal without notice.

## 6. Training

The Company will provide training to all individuals about their data protection responsibilities as part of the induction process.

Individuals whose roles require regular access to personal data, or who are responsible for implementing this policy or responding to subject access requests under this policy, will receive additional training to help them understand their duties and how to comply with them.

## 7. Who is responsible for taking care of your data?

3-Space is principally responsible for looking after your personal data (your Data Controller) if you have a contract with us, visit our website, and use our app, portal and social media sites.

## 8. What personal data do we collect?

If you are a **private individual and have a contract with us**, we will process your contact details (name, address, telephone and fax numbers, email address, a copy of an address ID), identity details (date of birth, National Insurance Number, Unique Tax Reference Number, a copy of a photo ID), information about your business (business type, name and company number, VAT type), your family information (spouse's or partner's name, information about children), information about our engagement, your financial data (income and sources, taxes and their share, investments, bank and account number, tax residency details), information relevant to taxation (properties, their acquisition and living there, litigations, inheritance), login credentials for the portal. We will also process your emails, letters, documents and other written information you provide to us. If you are using our app and the portal, we will collect information that helps to identify you (your login credentials, IP address, device identification number), contact details (name, email address, phone number), information you upload and make accessible to us (documents and images with your receipts, incomes and expenses), your tracked location information, (your contacts on the mobile phone) and messages that you send to us.

If you are a **representative of an entity that has a contract with us**, we will process your contact details (name, address, telephone and fax numbers, email address), identity details (date of birth, National Insurance Number, Unique Tax Reference Number, a copy of an ID), information about the entity (business name and company number, VAT number) your family information (spouse's or partner's name, information about children), information about our engagement, your financial data.

If we are providing **company design, fit-out and refurbishment services**, we will process information relating to your registered office, along with names, addresses, company officers and persons of significant control.

## 9. When do we collect your personal data?

We will collect information from individuals and representatives of entities directly when they apply for, use our services and correspond with us by email, phone or otherwise.

We may collect information about them from other sources where we believe this is necessary to manage effective underwriting of the risk associated with a contract and/or helping fight financial crime. These other sources may include public registers and databases managed by credit reference agencies, government agencies such as Her Majesty Revenue and Customs (HMRC), and other reputable organisations.

We will collect and/or retrieve information from our website, app and social media sites users when they visit our website, download, enable and use the app and interact of our social media sites.

## 10. What do we use your personal data for?

If you are **a individual or a representative of an entity that enters into a contract with us**, we will use your personal data to register you for requested services and our portal, evaluate the risk of potential fraud or other illegal activities, provide requested financial services, respond to your enquiries and advise you, communicate with you, inform you about relevant news in the sector and keep your certain data in accordance with legal, regulator, tax or accounting requirements.

If you are **an employee enrolled to our services by the employer**, we will use your personal data to provide requested financial services to your employer.

If **you are visiting our website**, we will use your personal data to enable the functionality of our website, to analyse what you are interested in on our website and to improve it to ensure that content is presented in the most effective manner for you and for your device.

If **you are using our app**, we will use your personal data to enable the usage of the app and provide requested services.

If **you are following us and interacting on our social media sites**, we will use your personal data to provide relevant information to you and the audience.

## 11. Lawful bases for using your personal data

We will make sure that we only use your personal data for the purposes where we are satisfied that:

- our use of your personal data is necessary to perform a contract or take steps to enter into a contract with you (e.g. to provide our services to you);
- our use of your personal data is necessary to comply with a relevant legal or regulatory obligation that we have (e.g. to retain your documents in compliance with statutory tax, audit and accountancy obligations);
- you have provided your consent to us using the data in that way (e.g. to use our portal or the app);
- our use of your personal data is necessary to support 'legitimate interests' that we have as a business (e.g. to evaluate your risk for potential fraud or other illegal activities), provided it is conducted at all times in a way that is proportionate, and that respects your privacy rights.

## 12. Who do we share your personal data with?

We work with third parties that help us to manage our business and deliver services. These third parties may from time to time need to have access to your personal data.

The third parties may include:

- Service Providers, who help manage our IT and back office systems and other support services and systems.
- Credit reference agencies and organisations working to prevent fraud in financial services,
- Our regulators, which may include, Professional Bodies, the Financial Conduct Authority (FCA), Her Majesty Revenue and Customs (HMRC) and Information Commissioner's Office (ICO), as well as other

regulators and law enforcement agencies in the EU and around the world, solicitors and other professional services firms,

- We may be under legal or regulatory obligations to share your personal data with courts, regulators, law enforcement or in certain cases other insurers. If we were to sell part of our businesses, we would need to transfer your personal data to the purchaser of such businesses.

We will only transfer your personal data to companies which are recognised as providing an adequate level of protection or where we can be satisfied that alternative arrangements are in place to protect your privacy rights. Your personal data will never be passed on to any other companies or third parties (other than the third-party service providers described above) and will never be added to any third-party mailing lists or databases unless you opt in to do so.

### **13. Marketing correspondence**

We may use your personal data to send you our newsletter and other marketing correspondence about our services, events and related news in the sector. This may be in the form of email or a letter sent by post.

In most cases our processing of your personal data for marketing purposes is based on our legitimate interests, although in some cases (such as where required by law) may be based on your consent. You have a right to prevent direct marketing of any form at any time – this can be exercised by contacting us using the details set out to you in Section 13.

### **14. How long do we keep your personal data?**

We will retain your personal data for as long as is reasonably necessary for the purposes listed. In some circumstances we may retain your personal data for longer periods of time, for instance where we are required to do so in accordance with legal, regulator, tax or accounting requirements.

In specific circumstances we may also retain your personal data for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your personal data or dealings.

We maintain a data retention policy which we apply to records in our care. Where your personal data is no longer required we will ensure it is securely deleted.

### **15. Security of your personal data**

We are committed to handling your personal data with high standards of information security. We use computer safeguards such as firewalls and data encryption, we enforce physical access controls to our buildings and files, and we authorise access to personal data only for those employees who require it to fulfil their job responsibilities. The security of your portal account relies on your protection of your password. You may not share your password with anyone. Our employees will never ask you for your password, so any email or other communication requesting your password should be treated as unauthorised and suspicious and forwarded to us. If you believe someone else has obtained access to your password, please change it immediately by logging in to your account and changing your Profile settings, and also contact us straight away.

### **16. Your rights**

You have several rights in relation to your personal data.

You may request access to your data, correction of any mistakes in our files, erasure of records where no longer required, restriction on the processing of your data, objection to the processing of your data, data portability or the basis for international transfers. You may also exercise a right to complain to the ICO. More information about each of these rights can be found by referring to the table set out below.

To exercise your rights you may contact us. Please note the following if you wish to exercise these rights:

## Right

What this means

### Access

You can ask us to:

- confirm whether we are processing your personal data; – give you a copy of that data;
- provide you with other information about your personal data such as what data we have, what we use it for, who we disclose it to, whether we transfer it abroad and how we protect it, how long we keep it for, what rights you have, how you can make a complaint, where we got your data from and whether we have carried out any Automated Decision Making or Profiling, to the extent that information has not already been provided to you in this Policy.

### Rectification

You can ask us to rectify inaccurate personal data.

We may seek to verify the accuracy of the data before rectifying it.

### Erasure

You can ask us to erase your personal data, but only where:

- Your data is no longer needed for the purposes for which it was collected;
- You have withdrawn your consent (where the data processing was based on consent);
- Your objection to the processing of data is deemed to be successful;
- Your data has been processed unlawfully;
- Your data has to be erased for compliance with a legal obligation we are subject to.

We are not required to comply with your request to erase your personal data if the processing of your personal data is necessary:

- For compliance with a legal obligation;
- For the establishment, exercise or defence of legal claims.

There are certain other circumstances in which we are not required to comply with your erasure request, although these two are the most likely circumstances in which we would deny that request.

### Restriction

You can ask us to restrict (i.e. keep but not use) your personal data, but only where:

- Its accuracy is contested, and we need to verify it;
- You think that the processing is unlawful, but you do not want to erase data;
- Your personal data is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims;
- You have exercised the right to object, and verification of overriding grounds is pending.

We can continue to use your personal data following a request for restriction, where:

- we have your consent;
- we need to establish, exercise or defend legal claims;
- we have to protect the rights of another natural or legal person.

### Portability

You can ask us to provide your personal data to you in a structured, commonly used, machine-readable format, or you can ask to have it 'ported' directly to another Data Controller, but in each case only where:

- The processing is based on your consent or on the performance of a contract with you;
- The processing is carried out by automated means.
- The processing is based on your consent or on the performance of a contract with you;
- The processing is carried out by automated means.

### Objection

You can object to any processing of your personal data which has our 'legitimate interests' as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests.

Once you have objected, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.

### **Your Identity**

We take the confidentiality of all records containing personal data seriously and reserve the right to ask you for proof of your identity if you make a request in respect of such records.

### **Fees**

We will not ask for a fee to exercise any of your rights in relation to your personal data unless your request for access to information is unfounded, respective or excessive, in which case we will charge a reasonable amount in the circumstances. We will let you know of any charges before completing your request.

### **Timescales**

We will aim to respond to your request within one month unless it is particularly complicated, or you have made several requests in which case we aim to respond within three months. We will let you know if we are going to take longer than one month. We might ask you if you can tell us what exactly you want to receive or are concerned about. This will help us to action your request more quickly.

## **17. Third Party Rights**

We may refuse to fulfil your request where it would adversely affect the rights and freedoms of other data subjects.

## **18. Contact and complaints**

The primary point of contact for all issues arising from this Policy, including requests to exercise data subject rights, is 3-Space (UK) Ltd who can be contacted in the following ways:

- (1) Via email to 3-Space (UK) Ltd: Operations Director-Kathryn Lowe [Kathryn.lowe@3-spaceuk.com](mailto:Kathryn.lowe@3-spaceuk.com)
- (2) Mail: 3-Space UK Ltd. May Court, Links Business Centre, Old Woking Road, Woking, Surrey GU22 8BF
- (3) Telephone: 020 3773 7900