

Civil Rail Solutions Ltd (hereinafter referred to as the “Company”) due to the nature of the business, needs to collect personal information to effectively carry out our everyday business functions and activities and to provide the services defined by our business type.

The following data will be collected from employees and includes (but is not limited to), name, address, email address, data of birth, private and confidential information, sensitive information and bank/credit card details.

In addition, we may be required to collect and use certain types of personal information to comply with the requirements of the legislation or regulation, however we are committed to processing all personal information in accordance with the General Data Protection Regulation (GDPR), UK data protection laws and any other relevant the data protection laws and codes of conduct (herein collectively referred to as “the data protection laws”).

The Company has developed policies, procedures, controls and measures to ensure maximum and continued compliance with the data protection laws and principles, including staff awareness in relation to confidentiality, procedure documents, audit measures and assessments.

Ensuring and maintaining the security and confidentiality of personal and/or special category data is one of our top priorities and we are proud to operate a 'Privacy by Design' approach, assessing changes and their impact from the start and designing systems and processes to protect personal information at the core of our business.

The main key points of data protection follows: -

- **Biometric data** -means personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopic data. This the company does not currently use however, clients that the company are deployed for do, and therefore how they deal with collected data is of extreme importance to the company and a clear and robust regime needs to be identified before Biometric Data can be taken by the Companies Staff.
- **Consent** - of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.
- **Data Controller or appointed Department Controllers** - means, the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
- **Data Processor or appointed Department Data Processor** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.
- **Data protection laws** - means for the purposes of this document, the collective description of the GDPR, Data Protection Bill and any other relevant data protection laws that the Company complies with.
- **Data subject** - means an individual who is the subject of personal data
- **GDPR** - means the *General Data Protection Regulation (EU) (2016/679)*
- **Genetic data** - means personal data relating to the inherited or acquired genetic characteristics of a natural person which give unique information about the physiology or the health of that natural person and which result, in particular, from an analysis of a biological sample from the natural person in question.
- **Personal data** - means any information relating to an identified or identifiable natural person (*'data subject'*); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

- **Processing** - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- **Profiling** - means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.
- **Recipient** - means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.
- **Third Party** - means a natural or legal person, public authority, agency or body other than the data subject, under our direct authority



Signed

Managing Director - Civil Rail Solutions Ltd

Date 28th March 2020