



Data Protection Policy

The Group must always take care as to how it collects, maintains and manages personal information about employees, customers, suppliers and other individuals

Scope

This Policy applies to all employees, officers, consultants and contractors of the Group and its subsidiaries. In addition this Policy also applies to all agents, representatives or other third party intermediaries providing services and retained by Group companies who manage, collect or otherwise carry out processing of personal data in connection with providing services to Group companies.

The responsibility for monitoring adherence with this Policy and related legislation resides with the manager responsible for human resources within the Group company.

Our Policy

All Group companies must adhere to the requirements of their country's data protection or equivalent privacy legislation.

We will:

- treat personal information with respect and sensitivity and in accordance with any obligations of privacy;
- take disciplinary action against employees who are found to have violated any provision of this Policy which may lead to dismissal or termination of employment and, if appropriate, criminal proceedings;
- terminate business relationships with any agent or third party representative that violates any provision of this Policy.

Guidance Information

The Group collects, maintains and processes personal information about employees, customers, suppliers and other individuals. This information is often referred to as personal data.

Personal Data means data which relates to a living individual who can be identified either: (a) from that data; or (b) from data and other information which is in the possession of, or is likely to come into the possession of, a data controller (ie the entity which controls the data concerned). The definition includes expressions of opinion about the individual and any indication of intentions in respect of that individual

Processing means obtaining, recording or holding the information or data, or carrying out any operation or set of operations on the information or data, including: (a) organisation, adaptation or alteration; (b) retrieval, consultation or use; (c) disclosure, transmission, dissemination or otherwise making available the data; or (d) alignment, combination, blocking, erasure or destruction.

Policy Standard

Procedures must exist to ensure that where applicable, any formal registration requirements for the processing of personal data by Group companies are regularly reviewed and kept up-to-date.

Each Group company must be able to answer any enquiries regarding the processing of personal data from employees, third parties or regulators promptly and within any applicable statutory time limits.

How We Use Personal Data

We will:

- only collect or use personal data for Company business purposes;
- ensure that individuals whose personal data we hold are aware as to the purpose such information will be used for;
- only share personal data if the people whose information we hold have consented to us doing this or there is some other legal and lawful reason for doing so;
- keep personal data and information securely, whether it is held electronically or on paper and put in place processes to prevent unauthorised or accidental disclosure or loss;
- restrict access to personal data to those who need to know;
- ensure that personal data is accurate and up to date;
- delete or destroy personal data as soon as there is no more need for it and permitted to do so in terms of any regulatory or legal retention requirements;
- ensure that employees who handle personal data understand their responsibilities in terms of this Policy and any applicable legislation;
- comply with any additional local legal requirements relating to processing.

We Will Not

We will not:

- sell or trade personal data belonging to the Group to third party companies such as marketing companies;
- transfer personal data to other countries without adequate protection.

Further Information

Sometimes you know what the right thing to do is but sometimes there is an element of doubt. If you are unsure then ask and remind yourself:

- Does it comply with the Policy and the Group Code of Business Conduct?
- Would I be embarrassed if anyone within or outside of the Company knew about the situation or my actions?
- Would I be happy to have my own personal data or information used in such a way?

This Policy applies not only to employees but also to anyone providing services to the Group.

Please read the following (accessible via CSR Policies on Group website and via the Group Policy section of the Group Intranet):

Group Code of Business Conduct

Please Speak To:

Your Line Manager/Human Resource Manager/Finance Director/Managing Director

Group Risk & Compliance Counsel or Group Company Secretary

Tel: +44 (0)121 704 7430

Email: compliance@hsholdings.com