



POLICIES & STATEMENTS

Cardo Group Privacy Notice

December 2024

Introduction

Cardo Group are the 'data controller' of 'personal data' that we collect about our 'data subjects'. Our data subjects include our current and former employees, and applicants, and our business contacts. We are responsible for how their data is processed, with the word 'process' meaning the things that can be done with personal data, including collection, storage, use and destruction of data.

We also carry out a large amount of processing of personal data on behalf of our clients, in order to provide our services to them. In these cases, our client is the 'data controller' with responsibility for the legal basis for the processing and for communicating that to their own data subjects (including residents). We carry out the processing on their behalf, only as far as it is required as a part of carrying out maintenance and retro-fitting work for those clients. Any queries about the data processing carried out on behalf of clients should be directed to those clients, but we will assist where we can.

This privacy notice explains why and how we process your personal data if you are our data subject, and explains the rights you have, including amongst others, the right to access your data, and to object to the way it is processed. Please see the section on 'Your rights as a data subject' for more details on your rights and how to exercise them.

Our details are:

Website:	www.cardogroup.co.uk
Email:	enquiries@cardogroup.co.uk
Address:	Unit 10, Stuart Close, Trade Park, Cardiff, CF11 8EE
Tel. No:	01446 73786

If you have any queries about this notice or anything related to data protection, you can contact our Data Protection Lead using the details above.



Personal data

'Personal data' is any information that relates to a living, identifiable person. This will usually include your name, address, contact details, and other information we collect as part of our relationship with you, whether you are an employee, a former employee, an applicant, a consultant, or other work contacts.

That information can also include 'special categories' of data, which is the official term for information about a person's race or ethnic origin, religious, political or other beliefs, physical or mental health, trade union membership, genetic or biometric data, sex life or sexual orientation.

The use of this type of data, and of information about criminal convictions and offences, is subject to strict legal controls.

We only process your data if we need to for a specific purpose, as explained below. Most often, we collect your personal data directly from you, through our contact with you.

Your data and how and why we process it

We process your data so we can manage and support our relationship with you, comply with legal obligations, improve our services and achieve our legitimate business aims.

Employees – Current & Former & Applicants

We process your name, contact details, work-related history and performance information, and other information produced through our interactions, which is necessary for the purposes of your employment contract, or for recruitment.

If you prefer not to provide some basic information about your contact details, or work-related information, please be aware that we may not be able to continue to employ you under the terms of your contract, or continue the recruitment process.

Where we require information about your health or disability status, this is on the basis of managing your employment and managing health & safety in line with the (employment and health & safety) law when/if: you are absent; your work is otherwise affected by your health status; your work may affect your own, or someone else's, health status; or if you wish to request reasonable adjustments.

Where we ask you for information about your race, religion, health/disability or sexuality for the purposes of monitoring, maintaining and improving equality of opportunity and treatment, this is optional for you to provide, and we process the data based on the legal basis of it being necessary for our legitimate interests, specifically for



a task in the substantial public interest (i.e. for the purpose of monitoring and maintaining/improving equality of opportunity or treatment.)

Consultants & Contractors

We process your name, contact details, work-related history and performance information, and other information produced through our interactions, which is necessary for the purposes of your contract, and on the basis of our business's Legitimate Interests to be able to provide our services in the most effective and efficient way, by engaging consultants and contractors either directly or through limited companies.

Where we require information about your health or disability status, this is on the basis of managing your contract and managing health & safety in line with the (employment and health & safety) law when/if: you are absent; your work is otherwise affected by your health status; your work may affect your own, or someone else's, health status; or if you wish to request reasonable adjustments.

Where we ask you for information about your race, religion, health/disability or sexuality for the purposes of monitoring, maintaining and improving equality of opportunity and treatment, this is optional for you to provide, and we process the data based on the legal basis of it being necessary for our legitimate interests, specifically for a task in the substantial public interest (i.e. for the purpose of monitoring and maintaining/improving equality of opportunity or treatment.)

If you prefer not to provide some basic information about your contact details, or work-related information, please be aware that we may not be able to continue to contract with you under the terms of your contract.

Client contacts and other business contacts

We process your name, contact details, and other information produced through our interactions, to enable us to manage our working relationship with you, on the basis of our business's Legitimate Interests to be able to provide our services to those who need them, in the most effective way. The processing is also necessary for your own business's Legitimate Interests, so it can access, or consider accessing, our services.

You have the right to object to any of our processing and we will assess any objection sensitively.

For clarity, we are not the data controller of personal data relating to your residents, that you share with us in order to provide our services; you are the data controller in that case, and we are your data processor.



Marketing messages

If we send electronic marketing messages to you as an individual (rather than a business representative), we will do so only on the basis of your freely-given consent and you can opt-out at any time.

If we send electronic marketing messages to you as a business or other body representative, we will do so for the purposes of our legitimate interests to increase awareness of our services, and you can opt-out at any time.

If we send hard copy marketing messages to you, we will do so for the purposes of our legitimate interests to increase awareness of our services, and you can opt-out at any time.

Why we share your data

We share the data we process with other organisations, only when we have a lawful basis to do so, or when we are engaging a supplier who will act as a 'data processor' on our behalf. 'Data processors' are businesses who handle, or could potentially handle, personal data as part of providing a service to us, and include our IT system providers, our email providers, our website hosts, and our consultants and contractors.

Where we are a data processor for our clients, our processors become sub-processors.

Other organisations we share data with include the HMRC and banks for processing tax and payments, and we will co-operate with police and other authorities if we are asked to and it is proportionate, for the purposes of investigating or preventing crime, including fraud, and other unwanted behaviours such as incompetence in public roles.

How we store your data

It is our policy to store data electronically where possible, not in hard copy. Electronic data, including emails, is stored securely on servers based in the EEA.

How long we keep your data

Some of our retention periods are based on legal requirements, and others are based on the practical reasons we need to keep the data for a certain period of time.

Once we reach the retention period, we securely delete the relevant data, unless we are legally required to keep it longer, or there are legal reasons why we should keep it longer.



Your rights as a data subject

As a data subject, you have the following rights in relation to your personal data:

- To be informed about how and why your data is handled;
- To gain access to your personal data;
- To have errors or inaccuracies in your data changed;
- To have your personal data erased, in limited circumstances (sometimes known as the 'right to be forgotten');
- To object to the processing of your personal data for marketing purposes or when the processing is based on the public interest or other legitimate interests;
- To restrict the processing of your personal data, in limited circumstances;
- To obtain a copy of some of your data in a commonly used electronic form, in limited circumstances;
- Rights around how you are affected by any profiling or automated decisions.

If you wish to exercise any of these rights, please contact us.

For more information about these rights, please see the ICO's website <https://ico.org.uk/> or contact our Data Protection Lead using the details above.

Withdrawing consent

If we are relying on your consent to process your data, you may withdraw your consent at any time by contacting us.

Complaints to the Information Commissioner

You have a right to complain to the Information Commissioner's Office (ICO) about the way in which we process your personal data. You can make a complaint on the ICO's website <https://ico.org.uk/>.

Cookies

Our website uses cookies, some of which are essential for the operation of the website and some which are non-essential and help us by analysing the most visited pages on our website, for example.

You can choose to reject non-essential Cookies by using our Cookie Settings on our website, and you can set your own browser to reject all Cookies but please be aware this will affect the operation of our website on your devices.