

## Privacy Notice

### 1.0 INTRODUCTION

Sovereign FM Ltd (Sovereign) is committed to conducting its business in accordance with all applicable Data Protection laws and regulations.

We take the protection of data very seriously and we adhere to data protection laws and the General Data Protection Regulation (GDPR). Personal data is collected solely for the purposes of obtaining contact information and to fulfil contractual obligations with you.

We are registered with the Information Commissioner's Office as a Data Controller (registration number Z3585490). Our registered office is 34 Southwark Bridge Road, London SE1 9EU.

This privacy notice describes how we gather and process personal data so that our customers, suppliers and employees (current, past and prospective) understand how we collect, use, disclose and store personal information.

### 2.0 TYPES OF PERSONAL DATA PROCESSED

Sovereign processes personal data about:

- Prospective, current and past employees;
- Customers;
- Suppliers, contractors and service providers.

Personal data means any information capable of identifying an individual. Examples of the data we process are:

- Titles, names and gender;
- Addresses, email addresses, telephone numbers and other contact details;
- Financial information, e.g. bank account details;
- Transaction data which may include details about payments and purchase made between us;
- Contracts;
- Training records,
- Employment records;
- Usage data which may include information about how you use our website, products and services.

### 3.0 COLLECTION OF PERSONAL DATA

Most of this personal data is collected by direct interaction which includes filling in forms, or communication with us by post, phone, email or otherwise. Some personal data is provided by third parties such as references for employees and clients. Other personal data is collected during the course of the normal operations of running the business.

#### 4.0 HOW WE USE PERSONAL DATA

We will only use personal data when legally permitted. The most common use of personal data is:

- To manage and facilitate a contract and/or provision of services
- Compliance with legal or regulatory obligations
- Training purposes
- Responding to any enquiry or feedback from you

By providing us with your personal information via paper or electronic form you simultaneously agree to the use of your data as provided to us.

#### 5.0 LEGAL BASIS FOR PROCESSING ANY PERSONAL DATA

To meet Sovereign's contractual obligations to clients, employees and suppliers.

In most instances, the legal basis upon which we process the personal data is that the above uses are in our legitimate interest. We will only use the information we collect about you where it is fair to do so. For some types of processing of the personal information relating to you, we will ask you for your explicit consent to process your information in a certain way. In such instances, the legal basis we rely upon to process the personal information is consent.

#### 6.0 DISCLOSURE OF PERSONAL DATA

We may disclose personal data with the parties set out below:

- Third parties in order to engage with them for specialist services required as part of a contract;
- Service providers who provide IT and system administration services;
- Professional advisors including bankers, auditors lawyers and insurers who provide consultancy, legal, insurance and accounting services;
- HM Revenue & Customs, regulators and other authorities based in the UK and other relevant jurisdictions who require reporting of processing activities in certain circumstances;
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

#### 7.0 DATA SECURITY

At Sovereign we take the security of data seriously. Internal policies and controls are in place to try to ensure that data is not accidentally lost, misused, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions and they are subject to the GDPR and are obligated to handle your data confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 8.0 DATA RETENTION

Sovereign retains personal data for six years, after which time it is destroyed. During the six years retention period it is kept to fulfil the purposes we collect it for, including satisfying any legal, accounting, or reporting requirements.

## 9.0 RIGHTS IN RESPECT OF PERSONAL DATA

Under certain circumstances, data subjects have rights under data protection laws in relation to their personal data. These include the right to:

- Request access to the personal data processed about you;
- Request an amendment or update to personal data where it is inaccurate or incomplete;
- Request erasure of personal data;
- Object to processing of personal data;
- Request temporary or permanent restriction of processing of personal data;
- Request transfer of personal data;
- Object to automated processing, including profiling.

If you wish to exercise any of the rights set out above, please email us at [jwelch@sovereignfm.org](mailto:jwelch@sovereignfm.org). Sovereign will not charge a fee to access your personal data (or to exercise any of the rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. In the event that Sovereign refuses your request under rights of access, we will provide you with a reason for this which you have the right to legally challenge.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. Sovereign will accept the following forms of ID when information on your personal data is requested: a copy of your driving licence, passport or a utility bill not older than three months. A minimum of one piece of photographic ID listed above and a supporting document is required. If the quality of the ID is poor, further information may be sought before personal data can be released.

We will endeavour to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case we will notify you and keep you updated.

## 10.0 COMPLAINTS

In the event that you wish to make a complaint about how your personal data is being processed by Sovereign, you have the right to complain. We would ask that in the first instance you contact Sovereign by email at [jwelch@sovereignfm.org](mailto:jwelch@sovereignfm.org) and we will do our utmost to resolve the complaint. If you do not get a response within 30 days or you are dissatisfied with the outcome of your complaint you have the right to contact the Information Commissioner's Office (ICO) <https://ico.org.uk/for-the-public/raising-concerns>

Changes to this policy will be kept under review and we will place any updates on our webpage.