



# **Thompson Group**

## **Data Protection and Cookie Policy**

### **Statement**

During the course of our activities the Company will process personal data (which may be held on paper, electronically, or otherwise) about you and the Company recognises the need to treat it in an appropriate and lawful manner, in accordance with the Data Protection Act 1998 (DPA). The purpose of this policy is to make you aware of how the Company will handle your personal data.

### **Cookie Policy**

In certain circumstances when you access our website a cookie, which is a small piece of data, may be stored on your computer or mobile device. We use cookies to collect additional website data regarding usage and to assist generally with effective targeting and marketing of our services. Most web browsers automatically accept cookies, but your individual web browser settings, or your computer or device settings, should enable you to decline to accept cookies should you so desire. Certain websites are not accessible with cookies disabled, and it is possible that certain functions on our website may be limited with cookies disabled. Even if you have accepted cookies, as you may be aware they can be removed from your computer or other device at any time, either manually or with one of the one of the numerous cleaner programmes available online, many of which are free.

### **Data Protection Principles**

The Company will comply with the eight data protection principles in the DPA, which say that personal data must be:

- Processed fairly and lawfully
- Processed for limited purposes and in an appropriate way
- Adequate, relevant and not excessive for the purpose
- Accurate
- Not kept longer than necessary for the purpose
- Processed in line with individuals' rights
- Secure
- Not transferred to people or organisations situated in countries without adequate protection

"Personal data" means recorded information the Company holds about you from which you can be identified. It may include contact details, other personal information, photographs and expressions of opinion about you or indications as to our intentions about you.

"Processing" means doing anything with the data, such as accessing, disclosing, destroying or using the data in any way.

### **Fair and Lawful Processing**

The Company will usually only process your personal data where you have given your consent or where the processing is necessary to comply with our legal obligations. In other cases, processing may be necessary for the protection of your vital interests, for the Company's legitimate interests or the legitimate interests of others. The full list of conditions is set out in the DPA.

The Company will only process "sensitive personal data" about ethnic origin, political opinions, religious or similar beliefs, trade union membership, health, sex life, criminal proceedings or convictions, where a further condition is also met. Usually this will mean that you have given your explicit consent, or that the processing is legally required for employment purposes. The full list of conditions is set out in the DPA.

### **How we are likely to use your personal data**

The Company will process data about you for legal, personnel, administrative and management purposes and to enable us to meet our legal obligations as an employer, for example to pay you, monitor your performance and to confer benefits in connection with your employment.

The Company may process sensitive personal data relating to staff including, as appropriate:

- Information about an employee's physical or mental health or condition in order to monitor sick leave and take decisions as to the employee's fitness for work;
- The employee's racial or ethnic origin or religious or similar information in order to monitor compliance with equal opportunities legislation;
- In order to comply with legal requirements and obligations to third parties.

### **Processing for limited purposes**

The Company will only process your personal data for the specific purpose or purposes notified to you or for any other purposes specifically permitted by the DPA.

### **Adequate, relevant and non-excessive processing**

Your personal data will only be processed to the extent that it is necessary for the specific purposes notified to you.

### **Accurate Data**

The Company will keep the personal data it stores about you accurate and up to date. Data that is inaccurate or out of date will be destroyed. Please notify the Company if your personal details change or if you become aware of any inaccuracies in the personal data held about you.

### **Data Retention**

The Company will not keep your personal data for longer than is necessary for the purpose. This means that data will be destroyed or erased from our systems when it is no longer required.

### **Processing in line with your rights**

You have the right to:

- Request access to any personal data the Company holds about you
- Prevent the processing of your data for direct-marketing purposes
- Ask to have inaccurate data held about you amended
- Prevent processing that is likely to cause unwarranted substantial damage or distress to you or anyone else
- Object to any decision that significantly affects you being taken solely by a computer or other automated process

### **Data Security**

The Company will ensure that appropriate measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.

The Company has in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction. The Company will only transfer personal data to a third party if they agree to comply with those procedures and policies, or if they put in place adequate measures themselves.

Maintaining data security means guaranteeing the confidentiality, integrity and availability (for authorised purposes) of the personal data.

### **Providing information to third parties**

The Company will not disclose your personal data to a third party without your consent unless it is satisfied that they are legally entitled to the data. Where the Company does disclose your personal data to a third party, it will have regard to the eight data protection principles.

### **Subject Access Requests**

If you wish to know what personal data any Thompson Group Company holds about you, you must make the request in writing, with an accompanying fee of £10. All such written requests should be forwarded to the Thompson Group Managing Director or Company Secretary.

### **Breaches of this Policy**

If you consider that this policy has not been followed in respect of personal data about yourself or others you should raise the matter with your line manager. Any breach of this policy will be taken seriously and may result in disciplinary action.

Whistleblowing is particularly encouraged, and you may rest assured there will be no adverse consequences of any such. It is only by constant review and monitoring that the Company can ensure that its compliance is rigorously maintained.

Following the coming into force of the GDPR (the **General Data Protection Regulation** (EU) 2016/679 superseding the Data Protection Directive 95/46/EC) with effect from 25 May 2018, there have been potentially very serious consequences for misuse of personal data in particular.

**Adam Thompson**  
**Group Chief Executive**  
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