



Data Security Policy

Statement

Genco is strongly committed to protection of personal data. This privacy statement describes how and why we collect and use personal data and provides information about individuals' rights. It applies to personal data provided to Genco, both by individuals about themselves and by others. We may use personal data provided to us for any of the purposes described in this privacy statement or as otherwise stated.

Personal data is any information relating to an individual. Genco processes personal data for numerous purposes, the means of collection, lawful basis or processing, use, disclosure, and retention periods for each purpose may differ.

When collecting and using personal data, Genco policy is to be transparent about why and how we process this data. For specific processing activities, please go to the relevant sections of this statement.

Data Protection

The General Data Protection Regulations (GDPR) and the current Data Protection Act regulate our use of Employee's personal data. As an employer it is our responsibility to ensure that the personal data, we process in relation to our employees is done so in accordance with the required principals. Any data held shall be processed fairly and lawfully and in accordance with the rights of data subjects.

We will process data in line with our privacy notices in relation to both job applicants and employees.

We commit to ensuring that our employee's rights are upheld in accordance with the law and have appropriate mechanisms for dealing with such.

Collection of personal data

We collect and process personal data about our suppliers including subcontractors in order to manage the relationship, contract, to receive services from our supplier and, where relevant, to provide professional services to our clients.

Use of Personal Data

We use personal data for the following purposes:

Receiving services or product

We process data in relation to our suppliers and their staff as necessary to receive the services, e.g. where a supplier is providing us with a service, we will process personal data about those individuals who are providing the services.

Providing professional services or products to clients

Where a supplier is helping us to deliver services to a client, we process personal data about the individuals involved in providing the services in order to administer and manage our relations with suppliers and the relevant individuals and to provide such services to our clients.

Administering, managing and developing our business and services

We process personal data in order to run our business, including:

- Managing our relationship with suppliers.
- Developing our businesses and services (such as identifying client needs and improvements in service delivery).
- Hosting or facilitating the hosting of events; and

Security, quality and risk management activities

We have security measures in place to protect our and our clients' information (including personal data), which involves detecting, investigating and resolving security threats. Personal data may be processed as part of the security monitoring that we undertake, e.g. automated scans to identify harmful emails. We have policies and procedures in place to monitor the quality of our services and manage risks in relation to our suppliers. We collect and hold personal data as part of our supplier contracting procedures. We monitor the services provided for quality purposes, which may involve processing personal data.

Complying with any requirement of law, regulations or professional body of which we are members

We are subject to legal, regulatory and professional obligations. We need to keep certain records to demonstrate that our services are provided in compliance with those obligations and those records may contain personal data.

Data storage

We retain personal data processed by us for as long as we consider necessary for the purpose for which it was collected (including as required by applicable law or regulations).

Personal data may be held for a longer period where extended retention periods are required by law or regulations and in order to establish, exercise or defend our legal rights.

Personal data held by us may be transferred to:

Third party organisations that provide applications/functionality, data processing, salary processing or IT services to us.

We use third parties to support us in providing our services and assist improving, running and managing our internal IT systems. For example, providers of information technology, cloud-based software as a services provider, website hosting and management, data back-up, security and storage. The servers powering and facilitating Genco infrastructure are located at head office in the UK. Although, we are aiming to be fully cloud based by 2022, which is eliminate the requirement for servers.

Third party organisations that otherwise assist us in providing goods, services and information

Auditors and other professional advisers

Law enforcement or other government and regulatory agencies or to other third parties as required by, and in accordance with, applicable law or regulations

On occasion, we may receive requests from third parties with authority to obtain disclosure or personal data, such as to check that we are complying with applicable, law and regulations, to investigate an alleged crime, to establish, exercise or defend legal rights. Genco will only fulfil requests for personal data where we are permitted to do so in accordance with applicable law or regulations.

Changes to this privacy statement

We recognise that transparency is an ongoing responsibility, so we will keep this privacy statement under regular review.

Data controller and contact information

Genco Data Protection Officer is **Natalie Celik**

If you have any questions about this privacy statement or how and why we process your personal data, please contact us at:

Unit 13
Orchard Industrial Estate
Christen Way
Maidstone
Kent
ME15 9YE

Individual rights how to exercise them

You have right of access to personal data held by us as a data controller. This right may be exercised by written request only. We may charge for a require for access in accordance with applicable law.

Amendments of personal data

To update personal data submitted to us you must notify us in writing. Where practically possible, once we are informed that any personal data processed by us is no longer accurate, we will make corrections (where appropriate) based on your updated information.

Withdrawal of consent

Where we process personal data based on consent, individuals have the right to withdraw consent at any time. This must be done in writing.

Other data subject rights

This privacy statement is intended to provide information about what personal data we collect about you and how it is used. As well as rights of access and amendment referred to above, individuals may have other rights in relation to the personal data we hold, such as a right to erasure/deletion, to restrict or object to our processing of personal data and the right to data portability.

Complaints

If you want to complain about our use of personal data, please send this complaint to us in writing addressed to the Data Protection Officer.

If you are not satisfied with the outcome of your complaint you may also lodge a complaint with the Information Commissioner Office ("ICO), this is the UK data protection regulator. For further information on your rights and how to complain to the ICP, please refer to the ICO website, <https://ico.org.uk/>

Genco reserves the right to amend and update this Policy at any time.



John Roberts

Director

Dated: June 2021