

SUPPLIER/CONTRACTOR PRIVACY NOTICE

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Reference: Supplier / Contractor Privacy Notice

Issue No: 4.4

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1. Introduction

This Privacy Notice describes how we collect and use personal information about you before, during and after your working relationship with us in accordance with the General Data Protection Regulation (GDPR).

It applies to current and former suppliers, contractors, sub-contractors, consultants, agents, sole traders, and individuals, and their employees, sub-contractors, subsidiaries or affiliates, parent company, and sister companies that provide goods and/or services to Marshall Group.

The terms "holding company" and "subsidiary" a "holding company" or "subsidiary" shall be construed in accordance with section 1159 of the Companies Act 2006, and a "subsidiary company" shall be construed in accordance with section 1159 of the Companies Act 2006.

Marshall is the "data controller" for the purposes of data protection law. This means that we are responsible for deciding how we hold and use personal information. We are required by law to notify you of the information contained in this Supplier/Contractor Privacy Notice.

It is important that you retain and read this document.

We may update this document at any time and the latest version will always be available on the Company Internet. A paper copy of this can be obtained on request from Procurement Shared Services at Marshall.

2. Responsibilities

- 2.1 The Data Privacy Manager is responsible for ensuring that this notice is made available to data subjects prior to Marshall collecting/processing their personal data.
- 2.2 All Employees/Staff of Marshall who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention.

3. Privacy notice

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3.1 Who are we?

In the context of this Privacy Notice 'Marshall' refers to a group of different legal entities, details of which can be found on the Marshall Privacy Notice web page.

This Privacy Notice is issued on behalf of the group of companies known as Marshall, so when we refer to 'Marshall', 'The Company', 'we', 'us' or 'our' in this Privacy Notice, we are referring to the relevant company responsible for processing your personal data.

The entity which will be the controller for your data is the entity with which you (or your agent) have entered into a commercial contract arrangement for goods and/or services with Marshall.

Further company information can be found at <https://marshalladg.com/>.

Our Data Privacy Manager can be contacted directly here:

- dataprivacymanager@marshalladg.com (Marshall Data Privacy Manager)
 - +44 (7469) 103461
- GDPR.ProcurementServices@marshalladg.com (Procurement GDPR Owner)

Any queries referring to the Supplier/Contractor Privacy Notice should be referred to the Data Privacy Manager in the first instance.

3.2 We may collect and process the following personal data about you:

Personal data is any information that identifies a living individual such as name, an identifying number (e.g. National Insurance No, Clock No, Car registration), location or physical characteristics associated to that individual. It can be an opinion of someone, or any information that when combined together identifies the person.

In the context of this document this data will be referred to as ordinary.

Some personal data is classed as "special category data".

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This is data referring to race/ethnicity, religious beliefs, sexual orientation, political opinions, trade union membership, information about your health, genetic and biometric information.

Personal data type:

The Personal Identifiable Information (PII) we could use is:-

Ordinary personal data

- General B2B requirements – Contact Data – Your name, address and contact details, including email address and telephone number, company position, location
- General B2B requirements – Accounts Data – Information for Payment e.g. accounts contact, bank details, VAT Number, Company Number
- CV or Records relating to career history e.g. training, skills, industry or project experience, personal development, other professional and personal experience
- References – previous employers, educational establishment and professional and personal experience
- Information for Security e.g. criminal record declaration form, employment history, date of birth, place of birth, nationality, passport, driving license, photos and CCTV footage
- Documentation relating to right to work in International Traffic in Arms Regulations (ITAR) environments e.g. passport, nationality
- Airside Driver Form where applicable
- General Security Awareness Training (GSAT) Record where applicable
- Details of your scheduled attendance and location at work (place of work, days of work and working hours) within any contract

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- Documentation relating to travel arrangements where applicable e.g. Your name, address (including home address) and contact details, including email address and telephone number, company position, location, passport and visa details.
- If applicable Health & Safety information relevant to the work you are contracted to do.

Special category personal data (in respect of certain legal requirements only e.g. provision of Non-Destructive Testing Services or use of internal Travel Booking System)

- Records relating to occupational health e.g. Personal Protective Equipment (PPE) requirements and health surveillance records, eye test results
- Food or Health requirements related to Travel requirements

3.3 The personal data we collect will be used for the following purposes:

We need to process general B2B data to enable staff with a legitimate interest to communicate with you, and to be able to enter into and manage a commercial contract with you or your agent. To meet our obligations under legislation such as Goods and Services, Health and Safety, National Security, ITAR and Trade Control, European Aviation Safety Agency (EASA), Federal Aviation Administration (FAA), Transportation and Aviation.

For example, we need to process your data to enable you to get access to a UK controlled site, and then we may further need to obtain clearance for you to work in a controlled area with access to controlled documents to allow you to provide the services required.

Our legal basis for processing the personal data is:

In some cases, we need to process data to ensure that it is complying with our legal obligations. For example, to comply with health and safety laws, and for certain areas and

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services, it is necessary to carry out criminal record and security checks to ensure that individuals are permitted to undertake the role.

Any legitimate interests pursued by us, or third parties we use, are as follows:

We have a legitimate interest in processing personal data before, during and after the end of the commercial relationship. Processing personal data allows us to:

- run Requests for Information/Proposal (RFI/RFP) – tender assessment processes;
- create the contract and manage the contract processes;
- support major projects where a number of suppliers/contractors interface
- to ensure personal information required by other business areas eg security and accounts is provided to ensure access and payment required to allow the contract and services to run smoothly;
- maintain accurate and up-to-date procurement records and contact details;
- maintain accurate payment and accounting and financial records;
- Maintain the security of the site and ensure that we can deal effectively with allegations of misconduct which could (but is not limited to) CCTV Imagery and photography.
- to manage contract performance and related processes, and to resolve issues;
- obtain occupational health advice, to ensure that we comply with duties in relation to meet our obligations under Health and Safety law, Aviation law, and duty of care;
- ensure effective general Procurement and business administration; and
- respond to and defend against legal claims.

The Special Categories of Personal Data concerned are:

- Information about health or medical conditions, is processed to carry out Health and Safety and Aviation law obligations;
- Use of the Internal Travel Booking System within user profile health requirements and medical information is required.

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3.4 If you give us someone else's personal data

Sometimes you might provide us with another person's personal data – e.g. details of other employees or sub-contractors employees. In such cases, we require you to inform the individual what personal data of theirs you are giving to us. You must also give them our contact details and let them know that they should contact us if they have any queries about how we will use their personal data.

3.5 Disclosure

Your information may be shared internally, including with members of Marshall of Cambridge (Holdings) Limited. Other departments include (but is not limited to) Procurement and Logistics, ITAR and Trade Control, Airport, Security, Projects, Facilities, Health and Safety and Compliance, Accounts and Finance Teams, managers in the business area in which you work and IT staff if access to the data is necessary for performance of the services.

We may share your data with the following third parties:

- Consultants supporting Projects and Tenders where relevant and applicable
- Contractors you will be working and interfacing with on Projects where relevant and applicable
- Relevant Government Departments and Agencies relating to law and regulations
- Health and Safety or Compliance providers
- Security – Cloud Booking
- Ministry of Defence (MoD) – clearances and access to MoD sites if required
- Marshall customers – access to customer sites if required
- Airport Security providers
- Airport Advisors – Civil Aviation Authority, NATS, EASA, FAA, GSAT advisors
- Archiving Services provider
- Auditors

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- Legal advisors
 - Professional advisors
 - Marshall Group Holdings
 - Our HR Solutions provider

We share your data with third parties in order to:

- Obtain professional advice in respects to proposed goods, services and specifications provided in tender or proposal documents. In those circumstances the data will be subject to confidentiality arrangements.
- Obtain security clearances and background checks from third-party providers and obtain necessary criminal records checks from the Disclosure and Barring Service.
- Maintain Airport and Aviation certifications and seek associated professional advice.
- Maintain Marshall Group business management in respect of finance, accounting and annual auditing.
- Obtain any Airport clearances required in respect of working environment and security
- To process data on the company's behalf in connection with Airport and Aviation certification, Archiving, Travel, Security, Compliance, and Health and Safety.
- Obtain access if required to Marshall customer sites
- Maintain a record of your name, contact details, location and job title

3.6 Transferring personal data outside the EEA

All Countries within the European Union are covered by the GDPR, so your personal data will be handled and managed in exactly the same way as you would expect in the UK and EU Countries and can therefore be transferred without any other additional controls in place.

If a contractor, your contact details will be held in Workday which is our HR Solutions provider this data is hosted in Ireland and the Netherlands

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Other Countries considered to have adequate Data Protection laws in place are the additional countries included in the European Economic Area (Norway, Iceland & Liechtenstein) and the countries identified in the following link:-

https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en

In all other Countries where your personal data may be transferred the Company will ensure that appropriate measures are in place to protect it and will inform you of the transfer of data and the reasons why it is necessary.

If you require information on any other Countries that your personal data may currently be transferred to and the reasons for doing so please contact the Data Privacy Manager to find out what safeguards have been put in place to protect your data.

3.7 Retention period

We will hold your personal data for the duration of your association and/or contract with Marshall. The periods for which your data is held after the end of your association or your agents commercial contract with Marshall can be found below. The associated Company Retention Policy which can also be found on the Marshall Privacy Notice web page.

Retention of PII data including Special Category Data shall be assessed against the following criteria and retained for a period of whichever criteria ends last.

- (1) whilst your company (or your agent acting on your behalf) is an approved supplier to Marshall;
- (2) until replaced on review by your Company (or the agent acting on your behalf) revision;
- (3) required to maintain financial accounting records;
- (4) as required by Financial, ITAR or Trade Control or other legislation;
- (5) the life of any contract (including warranty periods) plus 7 years the data relates to;
- (6) the life of any project the data relates to;
- (7) the life of the platform the data relates to;

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Marshall shall not reproduce any Special Category Data as defined under GDPR legislation within any Project or Contract documents.

3.8 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to ask for data that we hold about you that is inaccurate or incomplete to be corrected.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records. If there is no overriding legal reason to keep it.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing
- Right to object to automated processing, including profiling – You have the right to ask for certain important computer-made decisions (including profiling) to be challenged and to ask for a human to intervene.
 - (Please note that at this time no automated processing of Personal Identifiable Information (PII) is in operation.
- in the event that Marshall refuses your request under rights of access, we will provide you with a reason as to why.
- You have the right to complain as outlined in clause 3.9 below.

All of your rights identified above apply to any third party (as stated in 3.5 above) should they be involved in the processing of your personal data.

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If you would like to exercise any of these rights, please contact the company Data Privacy Manager by emailing dataprivacymanager@marshalladg.com or by sending written correspondence to The Data Privacy Manager, Marshall, Airport House, Newmarket Rd, Cambridge, CB5 8RX.

You can make a subject access request by completing the organisation's Subject Access Request Form on the Marshall Privacy Notice web page

3.9 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Marshall Group (or third parties as described in 3.4 above), or how your complaint has been handled, you have the right to lodge a complaint directly with Marshall Group's Data Privacy Manager, by emailing dataprivacymanager@marshalladg.com or by sending written correspondence to The Data Privacy Manager, using the contact details below.

If the complaint is not resolved to your satisfaction you have the right to lodge the complaint with the Lead Supervisory Authority. In the UK the Information Commissioners Office (ICO) is the Supervisory Authority. Other EU Supervisory Authorities can be found [here](#)

The recommended method of communication to the ICO is via their website.

The details for each of these contacts are:

	Marshall	Supervisory Authority
Contact Name:	Data Privacy Manager	Information Commissioners Office (ICO)
Address line:	Marshall Aerospace and Defence Group Airport House Newmarket Rd	Wycliffe House Water Lane Wilmslow Cheshire

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	Cambridge CB5 8RX	SK9 5AF
Email:	dataprivacymanager@marshalladg.com	https://ico.org.uk/global/contact-us/email/
Telephone:		03031231113
Website	https://marshalladg.com/	https://ico.org.uk/concerns/

Document Owner and Approval

The Data Privacy Manager is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all members of staff on the Company Internet.

Change History Record

Issue	Description of Change	Approval	Date of Issue
1.0	Initial Issue	Matthew Asplin	07/11/18
2.0	Annual Review	Isobel Aylott	17/06/19
3.0	Replacement of 'Marshall ADG' with 'Marshall' as the overarching definition of the Marshall companies	Isobel Aylott	21/09/21

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4.0	Review to incorporate changes as result of change of HR Solutions provider	Isobel Aylott	16/11/21
4.1	Rebranded	Deborah Armitage	31/03/22
4.2	Reviewed, renamed and hyperlinks removed	Head of Information Governance	07/12/22
4.3	Full review, covering wider scoping on supervisory authorities and review of contractor coverage	Head of Information Governance	06/01/24
4.4	Annual Review	Head of Information Governance	01/07/26

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