

Serco Privacy Charter

1. Introduction

In the course of our business, Serco processes personal data. This can be personal data of our staff or other individuals, can be performed under contract and can be performed as a data controller or as a data processor. In all situations, Serco takes its obligations to process personal data seriously.

To ensure the proper process of personal data in all business contexts, Serco has established a data protection framework as an integral part of our global management system. This framework establishes the standards to which Serco holds itself accountable, and equally to which any individual can hold Serco to account. The framework is underpinned by clear processes and policies which allow Serco, our people and those who work with us to ensure that, in the context of their relationship with Serco, the way they handle and process personal data is secure, consistent and transparent.

The process of personal data is underpinned by law, but equally by clear and concise principles. This Privacy Charter outlines those principles and the relevant standards which Serco applies to ensure that all personal data is processed properly.

This Privacy Charter explains how Serco collects, handles and processes personal data, and sets out the standards which data subjects can expect Serco to comply with when doing so. You can find out more about our Serco Group companies in United Kingdom and Europe at www.serco.com/ukecompanies or by contacting dpo@serco.com.

2. Our Commitments

- We will process personal data in *compliance with applicable law* and *prevailing local legal requirements* and keep our data protection framework under review.
- We process personal data *fairly, lawfully* and in a *transparent manner*;
- We collect personal data for *specified, explicit* and *legitimate purposes* and in a manner compatible with those purposes;
- We collect personal data which is *adequate, relevant* and *limited to what is necessary* in relation to the purposes for which it is processed
- We will implement a process whereby personal data can be updated, such that it is which we hold is *accurate* and *up to date*;
- We retain personal data for *as long as is necessary* to achieve a specified purpose and;
- We identify and enforce *appropriate technical and organisational security measures* to protect personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage;
- We review *appropriate technical and organisational security measures* periodically to ensure that they are fit for purpose;
- We conduct an assessment and identify appropriate measures in advance of processing, collecting or transferring personal data;
- We do not process or transfer personal data outside of the European Economic Area or approved Third Countries unless *adequate safeguards* are in place to ensure the protection of such personal data;
- As a data controller, we will *notify* relevant supervisory authorities of personal data breaches in accordance with the procedures laid down in our policies and in compliance with prevailing applicable laws.
- We will put the data subject at the heart of our data protection framework and ensure that we respect and *comply with the rights of data subjects*
- It is a requirement of doing business with Serco that *third parties confirm their compliance* with applicable data protection laws.
- We are *aware of the rights of data subjects* and we shall treat all requests from any data subject pertaining to their personal data respectfully and in accordance with applicable law;
- We have established a *network of data protection champions* across our business to help uphold and deliver on these commitments.

3. Keeping Personal Data secure

Serco takes the security of all personal data very seriously and has put in place appropriate security measures and training to prevent personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to personal data to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process personal data on Serco's instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected data security breach and will notify data subjects and any applicable regulator of a breach where we are legally required to do so.

Please refer to Information and Data Privacy Group Standard for further details. (Available from: <https://www.serco.com/media/1014/1014.original.pdf>).

4. Data Subject Rights

Serco shall always respect and comply with the rights of data subjects in accordance with our obligations under the Data Protection Laws. Data subjects shall have the following rights in respect of their personal data and can exercise these rights by contacting Serco in the manner set out below. Data subjects may be asked to verify their identity before their request is processed.

- Right to object: Data subjects have a right to object to our processing of their personal data.
- Access to their personal data: Data subjects can request access to a copy of their personal data which we hold, along with information on what personal data we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. Request for access can generally be made free of charge.
- Right to withdraw consent: Where we are relying on the consent of the data subject (often in the context of marketing emails), the data subjects are entitled to withdraw their consent at any time.
- Rectification: Data subjects can ask us to change or complete any inaccurate or incomplete personal data which Serco holds about them.
- Erasure: Data subjects can ask us to delete their personal data where it is no longer necessary for Serco to use it, they have withdrawn their consent (where consent is the legal basis relied upon), or where we have no lawful basis for keeping it.
- Portability: Data subjects can ask us to provide them or a third party with some of the personal data that we hold about them in a structured, commonly used, electronic form, so it can be easily transferred.
- Restriction: Data subjects can ask us to restrict the personal data we use about them where they have asked for it to be erased or where they have objected to our use of it.
- Transfers outside of EU: Data subjects have the right to obtain a copy, or reference to, the personal data safeguards used for transfers outside the European Union. We may redact data transfer agreements to protect commercial terms.
- Complaints to supervisory authority: Data subjects are entitled to make a complaint about how we have used their personal data to us by contacting us, or to a supervisory authority - for the UK this is the Information Commissioner's Office, at <https://ico.org.uk/>

5. Contact us

We have appointed Data Protection Officers (**DPO**) to oversee compliance with the Data Protection Laws. If you have any questions, please address these to:

Serco (United Kingdom): Data Protection Officer, Serco Limited, Enterprise House, 11 Bartley Wood Business Park, Bartley Way, RG27 9XB.

Serco (Europe): Data Protection Officer, Serco Belgium SA, Avenue Cortenbergh 60, 1000 Brussels, Belgium

Alternatively, please email dpo@serco.com or call +44 (0)1256 745900.

6. Privacy policies and data protection standards

The personal data and special category personal data which Serco collects, stores and processes will depend on the nature of the data subject's relationship with Serco.

Serco Business

Website: Serco's Website Privacy Policy explains what personal data is collected when an individual : (i) visits our website (www.serco.com), (ii) elects to receive direct marketing from us; and/or (iii) applies for employment with Serco in the UK or Europe through the online Serco careers portal. (Available from: <https://www.serco.com/privacy-policy>)

Employees: Serco's Employee Privacy Policy explains what personal data Serco collects from employees, and applies to all current and former employees, contractors and all other workers employed by Serco. (Available from: <https://www.serco.com/media/2828/sms-p-uke-ii1-employee-privacy-policy.pdf?1541100072>)

Suppliers: Serco's Supplier Privacy Charter provides information about what personal data Serco collects relating to the personnel of our corporate customers and suppliers, sole traders and other unincorporated businesses. (Available from: <https://www.serco.com/media/2929/serco-supplier-privacy-charter-jan-19-final.pdf>)

Code(s) of Conduct: Serco's [Code of Conduct](#) and [Supplier Code of Conduct](#) details the standards and behaviours expected of everyone who works for and on behalf of Serco, including handling personal data on behalf of the business.

(Available from: <https://www.serco.com/about/serco-code-of-conduct> and <https://www.serco.com/media/2161/serco-supplier-code-of-conduct-3.pdf?1512990200>)

Associated Businesses

Edinburgh Cycle Hire (Just Eat Cycles)	https://edinburghcyclehire.com/privacy-policy
Emergency Planning College	www.epcresilience.com/footer-links/privacy-policy/
ExperienceLab	https://www.experience-lab.com/privacy-policy/
NorthLink Ferries	https://www.northlinkferries.co.uk/information/terms-and-conditions/online-privacy-policy/
Serco Caledonian Sleepers	https://www.sleeper.scot/privacypolicy