

1. Introduction

Serco takes its data protection responsibilities seriously. The following charter will help you understand how Serco collects, uses, discloses and safeguards the personal information of our suppliers and/or their personnel.

This Supplier Privacy Charter is issued on behalf of Serco Group, so when we refer to "**Serco**", "**us**", "**we**" or "**our**", we mean the Serco Group company or Serco Group companies based in the United Kingdom and Europe with which you or your employer has a contract and/or has business dealings with. 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. Personal Data Collected

We may collect and use the following personal information about you:

- **Personal Details:** title, full name, date of birth, e-mail address, visual images, sound recordings and personal appearance and behaviour.
- **Employment and Business Details:** industry, job role, business activities, employer, work contact details, details of services/products provided, the terms and conditions of your contract.
- **Financial Information:** transaction history and details, bank details and account numbers, invoice details.
- **Security Checks:** results from due diligence and security checks.
- **Internal Company Identifiers:** user name and password for accessing online invoicing system,
- **Incident History:** health and safety accidents, security incidents, accident information, complaints communications, insurance claims history.
- **IT Details:** information about the browser or device you used and the date and time you accessed our IT systems

Special Category and Sensitive Data

Subject to the below paragraph, we will not intentionally or systematically seek to collect, store or otherwise use information about you classed as 'special categories of data' or 'sensitive data' (for example, information relating to your ethnic origin, health or sexual orientation, criminal history).

In certain instances, we are required to undertake supplier due diligence to ensure that we are able to comply with our legal obligations (including our anti-money laundering and anti-bribery obligations). In undertaking such supplier due diligence, we may process information relating to any criminal convictions which you have. We undertake our supplier due diligence as it is necessary to allow us to meet our corporate ethics standards and regulatory requirements to unlawful acts and dishonesty.

3. How Your Personal Data Is Collected

- We collect information directly from you in various ways, including: over the phone, via email, in person and otherwise in writing.
- We may also receive information about you from third parties, including from: your employer, the providers of our due diligence checks when onboarding a business, our security checks team when a providers personnel requires access to Serco or customers IT systems.
- We may collect your data via our IT systems, including CCTV, body and vehicle cameras which operates at a number of our sites or when you log on to our procurement systems.
- Personal data may also be created by us, such as records of your communications with Serco.

4. How And Why We Use Your Personal Information

The purposes for which we may use your personal data referred to above and the legal basis on which we may perform such processing are set out below:

Where necessary to fulfil a contract, or take steps linked to a contract:

- To confirm details in order to purchase goods and service on behalf of Serco;
- To pay you for your goods and service.

For purposes which are required by law:

- In response to requests from government law enforcement authorities conducting an investigation.
- Screening for financial and other sanctions or embargoes.
- Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business eg. in the framework of money laundering regulations, tax control and reporting obligations.

Where necessary for Serco's legitimate interests, as listed below, and where our interests are not overridden by your data protection rights:

- To manage and facilitate the provision of products and/or services.
- To contact you and manage any enquiries, complaints and feedback.
- To undertake due diligence on all suppliers, which will include the details of directors, for risk management.
- For security checks of relevant supplier personnel to allow access to Customer and Serco IT systems.
- For accounting and auditing purposes.
- To monitor compliance with business policies including the Supplier Code of Conduct.
- To support business and administrative functions.
- For risk management purposes.
- For security and safety purposes.
- For staff training purposes.
- For business management and analysis purposes.
- To monitor supplier accounts to prevent, investigate and/or report fraud, misrepresentation, security incidents or crime, in accordance with applicable law.
- To protect our legal rights and manage the security of our networks and property (for example, through the use of CCTV).
- In connection with a business transaction such as merger, restructuring or sale of the business.
- We will use personal information in connection with legal claims, compliance, regulatory and investigative purposes as necessary (including disclosure of such information in connection with legal process or litigation).

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests. We have undertaken balancing tests (also known as legitimate interest assessments) in relation to data processing activities which we carry out on the basis of our legitimate interests and believe that such activities are justified and not overridden by your data protection rights.

5. Sharing Your Personal Information With Others

We will only disclose personal information to a third party in limited circumstances, including where the third party is providing a service to us as a data processor or where we are permitted to do so by law. The third parties we may share your personal data with include:

- other organisations within the Serco group of companies, where such disclosure is necessary for our business;
- third parties who help manage our business and deliver services (e.g. debt collectors, IT suppliers, suppliers of procurement management services, communication platform providers) or our professional advisors (e.g. law firms, insurers, auditors);
- Government, regulatory and law enforcement bodies as required.

We may transfer your personal data from one supplier to another as part of service migration where we change providers for a particular service, for example, if we change our supplier of procurement management services.

Less commonly, we may process and share your personal data with third parties where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent.

Transferring your personal information outside the European Economic Area

Serco operates on a global basis and accordingly we may share personal information with other companies within Serco Group located outside the European Economic Area, but we will ensure such transfers are covered by our intra-group data sharing agreement entered into by relevant entities.

We disclose your personal information to third parties outside the European Economic Area who provide services to us, particularly in India and US. Where we transfer your personal data outside of the European Economic Area, we will do so on the basis of (i) European Commission adequacy decisions; or (ii) binding contractual commitments, which will include the European Commission's standard contractual clauses.

6. Security Of Your Personal Information

Serco takes precautions including administrative, technical and physical measures to safeguard your personal information, including documented employee procedures, internal monitoring and training to help ensure that your information is protected and secure. Our employees and contractors are bound by confidentiality obligations and we only allow access to employees and those contractors who need it to conduct their business responsibilities.

How long do we keep your personal information?

We will store your personal information for as long as is reasonably necessary for the purposes set out in this Supplier Privacy Charter, including where we maintain an ongoing relationship you. We are required by law (for the purpose of complying with regulatory, tax, accounting requirements etc.) to retain certain information for a period of time following the expiry of our business relationship with you.

Generally, we will retain your personal data in accordance with any applicable limitation period (as set out in applicable law) plus one (1) year to allow reasonable time for review and deletion of the information held. This will usually be seven (7) years following the expiry of our business relationship with you.

We may store your personal information for longer periods of time, for instance to have an accurate record of your dealings with us in the event of any complaints or challenges or where we reasonably believe there is a prospect of litigation relating to your personal information or dealings. When no longer necessary to retain your personal information, we will delete or anonymise it.

7. Your Legal Rights

You have certain legal rights in relation to your personal information. For further details about these rights and how you may exercise them, please refer to our Privacy Charter (<https://www.serco.com/media/2930/serco-privacy-charter-final.pdf>) or contact the DPO via the details provided below.

8. Data Protection Officer

We have appointed a Data Protection Officer (**DPO**) to oversee compliance with this Supplier Privacy Charter. If you have any questions about this Supplier Privacy Charter or how we handle your personal information, please address to:

Data Protection Officer
Serco Ltd
Enterprise House
18 Bartley Wood Business Park
Bartley Way
RG27 9XB

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

Supervisory authority

We would be happy to address any concerns you have about your data privacy directly, and we encourage you to contact us in the first instance with your queries. However, you have a right to lodge a complaint with the Information Commissioner's Office (<https://ico.org.uk/concerns/> or telephone: 0303 123 1113) or other relevant supervisory authority who will then investigate your complaint accordingly.

Changes To This Supplier Privacy Charter

This Supplier Privacy Charter was updated in February 2019.

We may amend this Supplier Privacy Charter from time to time to keep it up to date with legal requirements and the way we operate our business. Please regularly check our website for the latest version of this Supplier Privacy Charter. On some occasions, we may also actively advise you of specific data handling activities or significant change to this Supplier Privacy Charter as required by applicable law.