

GDPR Privacy Notice

Trans Comms Ltd is committed to protecting the accuracy, privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you in accordance with the General Data Protection Regulation (GDPR).

Under the GDPR, Trans Comms is a "data controller" and "data processor", in certain circumstances. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice. We may update this notice at any time.

Data Protection Principles

We will comply with data protection law, ensuring that the personal information we hold about you is:

- Used lawfully, fairly and in a transparent way;
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- Relevant to the purposes we have told you about and limited only to those purposes;
- Accurate and kept up to date;
- Kept only as long as necessary for the purposes we have told you about; and
- Kept securely.

Types of Information Collected and Processed

Personal data, or personal information, refers to any data about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). Trans Comms collects and processes a range of personal information about you, which may include:

- Contact details such as your name, title, business and postal addresses, telephone numbers, and email addresses;
- Job title, profession, industry or sector;
- Interests and motives regarding the services supplied;
- Payment information and billing address;
- Recruitment information, references and other information included in a CV or cover letter or as part of the application process, employment history, including start and end dates, with previous employers;

The information that is processed about you is dependent on the purpose and channel of your enquiry. This includes:

- Enquiries for more information about the Company, via email, telephone or face to face;
- Job applications, via the website, job services boards or third-party recruiting agency;
- Information provided through our website, or third-party social media pages.

Managing Your Data

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Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. The situations in which we will process your personal information are listed below:

- Provide and deliver the products and services you request;
- Manage accounts and process payments for goods or services;
- Initiate and complete commercial transactions with you, or the entity that you represent, for the purchase of products and/or services;
- Carry out our obligations arising from any agreement or contractual obligations that we have with, or concerning you;
- Resolve technical issues related to the services, and send you technical notices, updates, security alerts and support and administrative messages;
- Provide you with the information, benefits and services that you request from the Company, via newsletters or invitations to events, where consent has been given;
- Notify you about our services and any changes or updates to those services;
- Enable you to access information or to submit applications regarding potential roles or career opportunities via the 'Careers' page accessible via this website;
- Enable us to review and respond to such applications where you have subscribed to such features via the website and provided explicit consent via a separate consent form referencing this privacy notice;
- Collect information such, as subject to your chosen cookie and privacy settings as made available on the website, your IP address, operating system and browser type for the purposes of website analytics;
- Review, develop and improve the website and services;
- Comply with our legal obligations, any relevant industry or professional rules and regulations;
- Comply with health and safety obligations;
- Comply with demands or requests made by any relevant regulators, government departments and law enforcement authorities or in connection with any disputes or litigation;
- Respond to your comments or complaints, including to investigate any complaints received from you or from others;
- Prevent fraud;
- Conduct data analytics studies to review and better understand engagement, retention and attrition rates;
- For business management and planning, including accounting and auditing.

Third Parties

We may share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so. Trans Comms contracts with business partners, suppliers, service providers, authorised third-party agents or contractors in order to provide a requested service or transaction, including processing orders, processing payments, hosting websites, hosting events and providing customer support.

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The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (EEA). If your personal data is transferred outside the EEA, we will put in place suitable safeguards to ensure that such transfer is carried out in compliance with applicable data protection regulations.

Data Retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are detailed in our Records Register (R005) and are available upon request.

Data Security

Trans Comms has internal policies and controls in place for security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality. Details of these measures are available upon request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Your Rights

Under certain circumstances, by law you have the right to:

- Request that Trans Comms changes incorrect or incomplete data;
- Request the transfer of your personal information to another party;
- Request erasure of your personal information. This enables you to ask the Company to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- Access and obtain a copy of your data on request (known as a “data subject access request”);
- Object to the processing of your data where the Company is relying on its legitimate interests as the legal ground for processing;
- Ask the Company to suspend the processing of your personal data for a period of time if data is inaccurate or there is a dispute about its accuracy or the reason for processing it;
- Withdraw your consent at any time, where we rely on your consent as our legal basis for processing your personal information;
- Make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

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If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Trans Comms Data Protection Officer.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in certain circumstances.

Changes to this Privacy Notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact the Trans Comms Data Protection Officer:

Robert Brown
Trans Comms Data Protection Officer
Trans Comms Limited
Unit 43 Blue Chalet Industrial Estate
London Road
West Kingsdown
TN15 6BQ
Robert.brown@transcomms.com

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

Directors: Gregory Jones / Robert Brown

Date 14/11/2023