



## 4R Group Confidentiality and Data Protection Policy

### Commitment to Confidentiality

4R Group is fully committed to maintaining the best possible control of personal and confidential information at all times.

### Personal Information

Personal information is managed in compliance with the General Data Protection Regulations (GDPR) May 2018 and any other relevant legal requirements.

The GDPR applies to “personal data”, meaning information that relates to an identifiable person. The definition is broad and, in the employment context, will include information in an employee’s personnel file, information held on HR systems, information contained in emails and information obtained through employee monitoring. The GDPR regulates the “processing” of personal data, including the collection, storage, use, alteration, disclosure and destruction of information.

**Personal data** means data relating to a living individual who can be identified from that data (or from that data and other information in our possession). Personal data can be factual (for example, a name, address or date of birth) or it can be an opinion about that person, their actions and behaviour (for example, appraisals or customer rating).

**Special Category data** includes information about a person's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health or condition, sex life or sexual preference, criminal allegations or offences.

When special categories of personal data are being processed, additional conditions must be met and typically we must either obtain the **explicit consent** of the data subject to record, use and store that data or be required to process such special categories of personal data to comply with our legal obligations.

### 4R Group comply with the principles set out in GDPR and when processing personal data ensure it will be:

- 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 up to date;
- Not kept longer than necessary for the purposes we have told you about
- Held securely and protected against misuse, loss or damage.

### We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- With the individual’s consent to the data processing
- Where we need to perform the contract we have entered into with an individual
- For compliance with a legal obligation to which 4R Group is subject

- Where it is necessary for 4R's legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest or for official purposes.

**When 4R Group collects personal data directly from individuals we will inform them about:**

- The purpose or purposes for which we intend to process that personal data.
- The types of third parties, if any, with whom we will share or disclose their personal data.
- The means, if any, with which data subjects can limit our use and disclosure of their personal data.

**Employees, Sub-Contractors and Customers have the following rights in relation to their personal data:**

- They can request access to any personal data held about them by 4R Group.
- Prevent the processing of their personal data for direct marketing purposes.
- Ask to have inaccurate personal data amended.
- Prevent processing that is likely to cause damage or distress to individuals.

**When handling our Employee, Sub-Contractor or Customer data 4R Group will:**

- Only use personal data for the specific purposes communicated to our employees, and/or sub-contractors and customers.
- Ensure that personal data we hold is accurate and kept up to date. We will check the accuracy of any personal data at the point of collection and, where we can, at regular intervals afterwards. We will destroy or amend inaccurate or out-of-date personal data.
- Not keep personal data longer than required for the purpose for which it was collected.
- Apply security measures to ensure no unlawful or unauthorised processing of personal data, or the accidental loss or damage to personal data.
- When contracting with suppliers and take appropriate steps to ensure that there is adequate protection in place.

**Employee Confidentiality Obligations**

Staff must not during or after the period of their employment divulge to any outside body any trade secrets, confidential information, supplier and customer details, pricing list and/or details of business connections including such of the foregoing that they have introduced into the Company during their employment.

Staff shall not remove from their place of employment any documentation of any description nor take copies of such documentation (electronic or otherwise) for their personal use or the use of a competitor or third party either during their employment or on termination of their employment. Any information provided by the 4R to staff will be regarded as confidential unless it is of a type that would be:

1. Freely available to the general public.
2. Freely available to members of the Company's trade or profession

Confidential information includes but is not limited to client details and their commercial requirements, fee rates, costings, profit margins, product pricing, other financial information, results of research and development, inventions, intellectual property, suppliers, policies, standards and procedures belonging to 4R or its clients and which come to the attention of staff during employment with the Company. Confidentiality obligations for employees are set out in an internal Staff Handbook (not publicly available). Employee personal information is managed in accordance with legal requirements.

### **Commercial Client Information**

Confidentiality is covered in standard client contractual terms and conditions. The terms and conditions confirm that each party will treat as confidential all trade secrets and confidential information disclosed to it by the other party and shall not disclose such information to a third party, or use such information for any purposes other than those envisaged by the agreed contract, without the prior written consent of the disclosing party.

Where correspondence is by Internet, email or other electronic media the 4R will take reasonable steps to safeguard the security of information transmitted but will not accept liability for its security and confidentiality beyond these steps.

### **Suppliers and Sub-Contractors**

The protection of confidential information is covered in standard contractual terms and conditions for the provision of supply or sub-contracted services.

### **Other Third Parties**

From time to time we may elect to share some confidential information (as defined above) to third parties for the purposes of normal business development. These purposes include (but are not limited to) potential joint-ventures, potential project collaborations and the engagement of professional advisers. In all cases, engagement with such parties will be covered by contracts or non-disclosure agreements with specific clauses relating to privacy that are consistent with this Policy.

### **Privacy Related Violations and Complaints**

Privacy related violations discovered by 4R will be investigated by a senior manager or Director with appropriate corrective actions taken to resolve the violation and where appropriate, preventive actions taken to minimise the risk of reoccurrence. Complaints from clients and third parties will be managed in accordance with a defined procedure forming part of 4R Group's ISO 9001 certificated quality management system.

**Responsibilities:**

4R Group is fully committed to the implementation of this policy. 4R Directors and Managers will work with our employees, sub-contractors and customers in order to achieve the policy objectives described. This policy will be periodically reviewed so that it continues to be effective and relevant to the business.