

Vantec Europe Limited's (VEU) Privacy Statement

VEU attaches great importance to the protection of your personal data. In this statement we want to provide clear and transparent information about how we handle personal data. We make every effort to ensure your privacy and therefore handle personal data with care. VEU complies in all cases with applicable laws and regulations, including the General Data Protection Regulation. This implies that we at least:

- Processing your personal data in accordance with the purpose for which they were provided, these goals and type of personal data are described in this statement;
- processing of your personal data is limited to only those data that are minimally required for the purposes for which they are processed;
- ask for your express consent if we need it for the processing of your personal data;
- have taken appropriate technical and organizational measures to ensure the security of your personal data;
- do not pass on personal data to other parties, unless this is necessary for carrying out the purposes for which they were provided;
- are aware of your rights regarding your personal data, to point this out to you and to respect them.

We VEU are responsible for the processing of your personal data. Our registered office is located at 3 Infiniti Drive, Hillthorn Business Park, Washington, Tyne and Wear, NE37 3HG and we can be reached on 0191 4161133.

Grounds for the Processing of Personal Data

We process personal data on the basis of the following principles:

- 1. To be able to implement an agreement;
- 2. For compliance with legal obligations;
- 3. For the defense of legitimate interests;
- 4. With the consent of the person concerned.

You can withdraw your consent at any time by contacting the Company's registered office.

What do we Process Personal Data For?

There are various purposes for which VEU collects and processes your personal data. VEU collects and processes contact data for this purpose in the context of its service provision to business contacts, including your name, job title, business address, business mobile telephone number and business email address.

This data is processed for the following purposes:

- To contact you;
- To be able to process your application;
- To be able to implement an agreement;
- To process your enquiry and inform you about its progress.

As an employer, the Company needs to keep and process information about employees for normal employment purposes. Specific detail is included within the Company's Employee Data Privacy Notice. Information we hold will be used for the purpose of management and administrative use only. We will keep and use it to enable us to run the business and manage our relationship with employees effectively, lawfully and appropriately, during the recruitment





process, whilst in employment, at the time when employment ends and after a person has left. This includes using information to enable us to comply with the employment contract, to comply with any legal requirements, pursue the legitimate interests of the Company and protect our legal position in the event of legal proceedings

As a company pursuing warehousing and logistic activities, we may sometimes need to process your data to pursue our legitimate business interests, for example to prevent fraud, administrative purposes or reporting potential crimes. We will never process employee's personal data where these interests are overridden by their own interests.

The sort of information we hold includes application forms and references, contracts of employment and any amendments to it; correspondence with or about you, information needed for payroll, benefits and expenses purposes; contact and emergency contact details; records of holiday, sickness and other absence; information needed for equal opportunities monitoring policy; and records relating to your career history, such as training records, induction, appraisals, other performance measures and, where appropriate, disciplinary and grievance records, flexible working requests, or driving licence records.

Where necessary, we may keep information relating to your health, which could include reasons for absence and GP reports and notes. This information will be used to comply with our health and safety and occupational health obligations. We may also need this data to administer and manage statutory and company sick pay, private healthcare, pension, life assurance, death in service or occupational health schemes.

Where we process special categories of information relating to your racial or ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, biometric data or sexual orientation, we will always obtain your explicit consent to those activities unless this is not required by law or the information is required to protect your health in an emergency. Where we are processing data based on your consent, you have the right to withdraw that consent at any time.

Enabling Third Parties and Transferring Personal Data

We may provide the information you give to us to third parties if this is necessary for the execution of the below described purposes:

• The processing of benefit schemes such as the bike, childcare voucher, private health, pension, life assurance/death in service or occupational health schemes.

We share your data within the group of companies of which we are a part. Where this involves the transfer of personal data outside the EEA, our group ensures that personal data is protected by the use of model contracts. More information on International data transfers using model contracts is available from the European Commission.

Where we transfer your data to a third party based in the US, this may be protected if they are part of the EU-US Privacy Shield. This requires that third party to provide data protection to standards similar levels of data protection to those in Europe. More information is available from the European Commission.

We do not pass on personal data to other parties with whom we have not entered into a processor agreement. We make the necessary agreements with these parties (processors) to ensure the security of your personal data.





Furthermore, in some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

We will not provide the information you provide to other parties, unless this is legally required and permitted. We may also share personal data with third parties if you give us permission in writing.

Rights Regarding Your Personal Data

As a data subject you have different rights with regard to your personal data. For example, you have the right to inspect your data, to delete or rectify, but also to the right to object to the processing and the right to data portability.

Technical and Organisational Measures

We have taken appropriate technical and organizational measures to protect your personal data against unlawful processing, for example we have taken the following measures;

- All persons who are able to access your data on behalf of VEU are obliged to maintain their confidentiality.
- We use a username and password policy for systems access;
- We password protect personal data if there is reason to do so:
- We back up the personal data in order to be able to recover it in the event of physical or technical incidents;
- · We regularly test and evaluate our measures;
- Our employees have been informed about the importance of the protection of personal data.

Retention Periods

VEU does not store personal data longer than necessary for the purpose for which it was provided or required by law.

Complaints

For questions about this privacy statement you can always contact us. You are also free to file a complaint with the regulator, at the Information Commissioner's Office.

