

Apogee Privacy and Cookies Policy

Apogee Corporation Ltd (“Apogee”) is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified, then you can be assured that it will only be used in accordance with this privacy statement.

In the course of providing various products or services to you, this could be directly with us, face to face, over the telephone, online or otherwise using any of the websites including customer portals (“our Websites”); or in the course of your employment / work with Apogee, we may process your personal data. Your personal data may include information like your name, address, email address or telephone number and processing could mean collecting, storing, using or disclosing your personal data.

Apogee has to comply with EU data protection regulations. This Privacy Policy forms part of Apogee’s obligation to be open and fair with all individuals whose personal data we process and to provide full information on how we process such personal data and what we do with it.

This Privacy Policy relates to the processing of your personal data by Apogee Corporation Limited and any of the Apogee brands which include Apogee Digital Document Services, Apogee Managed Services, Apogee Direct, Apogee Desktop Services and Apogee Jersey. Unless otherwise stated, all references to “Apogee”, “we” or “our” in this statement shall include all entities of Apogee Corporation Limited that will process personal data.

If you receive other services or products from Apogee, or use any of our specific websites or applications, such as our service portal you may be provided with further privacy notices or statements which may be contained in a separate supplemental policy or within our website/ application terms and conditions. These additional privacy notices or statements shall supplement this Privacy Policy.

1.1 LINKS TO OTHER WEBSITES

This Privacy Policy only relates to processing carried out by the stated entities of Apogee Corporation Limited. Apogee is not responsible for the processing of any personal data which you may provide directly to third parties. Third party websites accessed via an Apogee website or application are not covered by this Privacy Policy and any links to other websites have been provided merely for convenience.

1.2 WHAT THIS PRIVACY POLICY COVERS

- [▲](#) What personal data we collect about you
- [▲](#) How we collect your personal data
- [▲](#) What we use your personal data for
- [▲](#) Communications with you
- [▲](#) How we use cookies and other similar technology on our websites and applications
- [▲](#) When we may disclose your personal data
- [▲](#) How we protect your personal data and where we store it
- [▲](#) Your rights in relation to the personal data we collect
- [▲](#) How long we will hold your data for
- [▲](#) How we update or change this Privacy Policy
- [▲](#) How you can contact us?

Please read the following carefully to understand our practices regarding your personal data and how we will treat it. Please note that none of the lists or examples below are exhaustive, nor will they be fully representative for every individual.

1.3 WHAT PERSONAL DATA WE MAY COLLECT ABOUT YOU

1.3.1 Private Capacity

If you deal with Apogee in a private capacity (which does not include employees, contractors, temporary workers or other personnel of Apogee), for example if you take part in Apogee recruitment, for legitimate interests or contractual reasons we typically process the following types of personal data about you:

- ▲ Personal details, such as name, date of birth, occupation, marital status, country of residence and national insurance number, or equivalent.
- ▲ Contact details for your work and personal details, such as email address, postal address and/or telephone number.
- ▲ Identification documentation, such as a photocopy of your passport, driving licence, ID card or other documentation required by local law. Copies of these documents may include a photograph of your face and shoulders.
- ▲ Information provided through our recruitment process.
- ▲ Details of your visits to our websites and applications including, but not limited to, traffic data, location data and other communication data, and the resources that you access.
- ▲ Details of your visits to our premises including CCTV images of you and any motor vehicle used to visit our premises.

1.3.2 Customers and Clients

If you deal with Apogee in the capacity of a representative, employee or director of one of our customers, for legitimate interests or contractual reasons, we typically process the following types of personal data about you:

- ▲ Your name, work email address and other work contact details.
- ▲ Your role, position and/or job title within your employment.
- ▲ Your area of employment.
- ▲ In some circumstances, identification documentation, such as a photocopy of your passport, driving licence, ID card or other documentation required by local law. Copies of these documents may include a photograph of your face and shoulders.
- ▲ Details of your preferences for types of marketing events.
- ▲ Details of your visits to our websites and applications including, but not limited to, traffic data, location data and other communication data, and the resources that you access.
- ▲ Details of your visits to our premises including CCTV images of you and any motor vehicle used to visit our premises.

1.3.3 Employee

If you deal with Apogee in your capacity as an employee, contractor, temporary worker or other personnel, for legitimate interests or contractual reasons, we typically process the following types of personal data about you:

- ▲ Personal details, such as name, address, date of birth, marital status, emergency contact details, country of residence, national insurance number, salary, bank details.
- ▲ Professional details, such as email address, postal address, telephone number, your CV, qualifications, relevant experience and skills.

- ▲ Identification documentation, such as a photocopy of your passport, driving licence, ID card or other documentation required by local law. Copies of these documents may include a photograph of your face and shoulders.
- ▲ HR related records, such as training, performance assessments, absence and time-keeping records, disciplinary, grievance or capability proceedings, and background checks.
- ▲ Details of your access to our premises and to systems, software, websites, and applications including access and location data and communications data.
- ▲ CCTV images, which may include you in your daily activities including any motor vehicle used in your daily activities.

These types of personal data may include sensitive personal data.

We may also record telephone calls and store emails, application and internet logs in connection with your dealings with us. See section below 'When we record communications'.

In certain circumstances it may be mandatory for you to provide us with your personal data, to enable us to provide products or services to you or to comply with our legal obligations, for example. In other circumstances, it will be at your discretion whether you provide us with personal data or not. However, failure to supply any of the personal data we may request may mean that we are unable to maintain or provide services or products to you or your employer and/or you may be unable to take part in any of our recruitment campaigns, or fully access and use our internal systems and resources.

1.4 ACCURACY AND COMPLETENESS OF YOUR PERSONAL DATA

Apogee makes every effort to maintain the accuracy and completeness of your personal data which it stores and to ensure all of your personal data is up to date. However, you can assist us with this considerably by promptly contacting us if there are any changes to your personal data or if you become aware that we have inaccurate personal data relating to you (see section below 'Your rights in relation to the personal information data we collect'). Apogee shall not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete personal data or sensitive personal data that you provide to us.

1.5 HOW WE COLLECT YOUR PERSONAL DATA

Apogee usually collects your personal data from the information you submit during the course of your, or your employer's, relationship with us. This will typically be through various forms and documents, when you sign up to our market data news lists, are named as an authorised person to trade on behalf of your employer, sign up to access any of our products or services either on your own behalf or on behalf of your employer, take part in a recruitment campaign or when you become an employee, contractor, temporary worker or other personnel. We will also collect personal data when we monitor or record communications and/or through use of technology which may include CCTV, please see further information set out below.

1.5.1 Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We may use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

1.6 WHAT WE USE YOUR PERSONAL DATA FOR

Apogee and/or persons acting on our behalf may process your personal data for any of the following purposes, depending on the capacity in which you deal with Apogee:

- [A](#) for general HR administration, including payroll and benefits, training and development, performance management, sickness and absence management, grievance and disciplinary procedures, equal opportunities monitoring, business continuity planning;
- [A](#) for internal finance management, including personnel expense reimbursement, travel and time-keeping;
- [A](#) for the prevention of crime against Apogee property, employees or persons visiting Apogee in any capacity;
- [A](#) for monitoring and assessing compliance with Apogee's policies and standards;
- [A](#) for promotional and marketing materials and activities, including photos and videos;
- [A](#) to survey and ascertain your satisfaction with the products or services provided to you; including the administration of feedback, compliments and complaints;
- [A](#) to carry out money laundering, financial and credit checks and for fraud and crime prevention and detection purposes;
- [A](#) to provide you with requested products or services;
- [A](#) to identify persons authorised to trade on behalf of our clients;
- [A](#) for administrative purposes in relation to the security and access of our systems, premises, platforms and secured websites and applications;
- [A](#) to contact you about the services and products we offer;
- [A](#) to consider your suitability for any of our current or future employment opportunities and to confirm your references and educational background;
- [A](#) to ensure the content on our websites and applications is presented in the most effective manner for you;
- [A](#) to comply with our legal and regulatory obligations and requests including reporting to and/or being audited by national regulatory, enforcement or exchange bodies;
- [A](#) to comply with court orders and exercise and/ or defend our legal rights;
- [A](#) for any other legitimate business purpose; and
- [A](#) as otherwise permitted by any applicable law or regulation.

In the supplying products or services to you, Apogee and the third parties who process your personal data on their own behalf but through providing us or you with a service on behalf of us, may in some circumstances use automated decision making processes.

1.7 WHEN WE RECORD COMMUNICATIONS

Apogee and persons acting on our behalf may record and/or monitor communications (including telephone conversations over landlines and mobile phones, emails, instant messaging, chat rooms, fax and other electronic communications) between our employees, agents, consultants, contractors or other personnel and non-Apogee personnel/ individuals (such as employees of our clients). Apogee only does this to the extent permitted by applicable law for legitimate business purposes or other purposes permitted by law. Apogee collects this type of personal data for several reasons including but not limited to:

- ▲ recording facts;
- ▲ complying with applicable law and regulation;
- ▲ complying with internal procedures and policies;
- ▲ facilitating administration and support;
- ▲ assisting with security, crime prevention and fraud purposes; and
- ▲ investigating or detecting unauthorised use, wrongful use or abuse of our services, systems or other materials.

1.8 WHEN WE MAY DISCLOSE YOUR PERSONAL DATA

Apogee does not and will not sell, rent or trade your personal data. We will only disclose your personal data in the ways set out in this Privacy Policy and in the following circumstances:

- ▲ To any entity within Apogee Corporation Limited, which means any subsidiary of the ultimate holding company, MANZANA HOLDINGS LIMITED.
- ▲ To third parties who process your personal data on our behalf (such as our systems providers, or employee payroll provider).
- ▲ To third parties who process your personal data on their own behalf but through providing us or you with a service on behalf of us (such as our finance organisations, or our employee pensions providers).
- ▲ To third parties in the course of offering or providing services or products to you, for example credit reference agencies.
- ▲ To other financial institutions or regulatory bodies with whom information is shared for money laundering checks, credit risk reduction and other fraud and crime prevention purposes.
- ▲ To any third party to whom we assign or novate any of our rights or obligations.
- ▲ To any prospective buyer in the event we sell any part of our business or its assets or if substantially all of our assets are acquired by a third party, in which case your personal data could form part of one of the assets we sell.
- ▲ To any national and/or international regulatory, enforcement or exchange body or court where we are required to do so by applicable law or regulation or at their request.
- ▲ To any central or local government department and other statutory or public bodies (such as HMRC, DWP).

1.9 HOW WE PROTECT YOUR PERSONAL DATA AND WHERE WE STORE IT

We know how important it is to protect and manage your personal data. Apogee is committed to safeguarding and protecting your personal data and maintains appropriate security to protect any personal data you provide us with from improper or accidental disclosure, use, access, loss, modification or damage.

We use computer safeguards such as firewalls and data encryption, and we enforce physical access controls to our buildings and files to keep this data safe. We only authorise access to employees who need it to carry out their job responsibilities.

The personal data we collect from you will primarily be processed (including accessed in or stored) within the European Economic Area (“EEA”) however, occasionally we may process your data within a country or territory outside of the EEA, which does not offer the same level of protection of personal data as may be enjoyed within the EEA. By submitting your personal data to us, you agree to this processing. We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with applicable law and regulation and with Apogee’s policies and standards.

1.10 YOUR RIGHTS IN RELATION TO THE PERSONAL DATA WE COLLECT

If you wish to update or modify any of your personal data we store, access a copy of this personal data, or you would like us to stop processing any of your personal data which we hold, subject to applicable law, you can make such a request by writing /emailing to any of the addresses set out below. We will process your request within the time prescribed by applicable law. Where permitted under current legislative or regulatory obligations and in appropriate and applicable circumstances we reserve the right to charge an appropriate fee if you request access to the personal data we store on you.

In any of the situations listed above, in order for us to comply with our security obligations and to prevent unauthorised disclosure of data, we may request that you prove your identity by providing us with a copy of a valid means of identification.

If you currently receive marketing material from us but would prefer not to please contact us by e-mail or in writing at the address listed below. You can unsubscribe from any mailing lists to which you have previously subscribed by either utilising the unsubscribe link at the foot of your marketing email or by sending an email with UNSUBSCRIBE in the subject line.

If you are an employee, contractor, temporary worker or other personnel of Apogee, you may also be able to update and modify certain elements of your personal data by emailing HRandPayroll@apogee.com; you are also able to view your personal data by emailing Privacy@apogee.com.

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

1.11 HOW LONG WE WILL HOLD YOUR DATA FOR

We will only retain your personal data for as long as necessary to fulfill the purpose for which it was collected or to comply with legal, regulatory or internal policy requirements. However, if you wish to have your personal data removed from our databases, you can make such a request by writing to any of the address set out below. Subject to any legal or regulatory requirements, we will then delete this information.

If you an employee, contractor, temporary worker or other personnel of Apogee, you may also be able to remove certain fields of your personal data by emailing HRandPayroll@apogee.com (subject to any legal, regulatory, or internal policy requirements).

1.12 HOW WE UPDATE OR CHANGE THIS PRIVACY POLICY

We may change or update parts of this Privacy Policy in order to maintain our compliance with applicable law and regulation or following an update to our internal practices. We will do this by updating the wording of this document and updating the version number on the foot of this document, although, please be aware, you will not necessarily be directly notified of such a change. Therefore, please ensure that you regularly check this Privacy Policy so you are fully aware of any changes or updates.

1.13 HOW YOU CAN CONTACT US

If you would like to contact us in relation to this Privacy Policy, our Cookie Policy or anything else in connection with the personal data we collect on you, including, without limitation, where you would like to update your

personal data, would like a copy of the data we collect on you or would like to raise a complaint or comment, please contact us using the details set out below.

Email: Privacy@apogeeCorp.com

FAO: The Data Controller (Data Privacy), Apogee Corporation Limited, Nimbus House, Liphook Way, Maidstone ME16 0FZ

1.14 IF WE GET IT WRONG

We take the protection and use of your personal data very seriously, however if you believe that we have not acted in accordance of this policy; you have the right to refer our actions to the Information Commissioner's Office.

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