

## Dextra Group plc – GDPR Privacy Policy

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### 1. Introduction

Dextra Group (meaning Dextra Group plc and all of its subsidiaries) takes the privacy of your personal information very seriously and is committed to safeguarding your privacy and your personal information, complying with the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations 2003. This Privacy Policy relates to our use, of any personal information we collect from you directly, or indirectly via 3rd party data providers, covering individuals who;

Visit our website [www.dextragroup.co.uk](http://www.dextragroup.co.uk)

Use our products and services

Contact us concerning our products and services

Attend or register to attend our events (such as CPD courses) or other events in which Dextra Group participates.

Supply product or services to Dextra Group

Have applied to work for Dextra Group or are a current or former employee of Dextra Group

This Privacy Policy will explain the following;

What personal information may be collected about you

How Dextra Group will use this personal information

When Dextra Group may use this personal information to contact you

How long with Dextra Group retain your personal information

How your personal information may be shared with other parties

How your personal information will be kept secure

Your rights regarding the personal information you provide to us

The use of cookies on Dextra Group websites

How to contact us

In this policy, personal information means information relating to an identified or identifiable person. An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, and online identifier or to one or more factors specific to his/her physical, physiological, genetic, mental, economic, cultural or social identity.

Dextra Group plc., Brickfields Business Park, Gillingham, Dorset SP8 4PX

Tel: +44 (0)1747 858100 Fax: +44 (0)1747 858114 Email: [enquiries@dextragroup.co.uk](mailto:enquiries@dextragroup.co.uk) [dextragroup.co.uk](http://dextragroup.co.uk)

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Dextra Group encourages you to review the privacy statements of websites you choose to link to from Dextra Group so that you can understand how those websites collect, use and share your information. Dextra Group is not responsible for the privacy statements or other content on websites outside of the Dextra Group websites.

## **2. What information is held about you, and how it is used?**

Dextra Group collects personal data as a result of its various group activities. These activities are listed below, together with an explanation of the data collected and the lawful basis for processing.

### **Use our products and services**

Dextra Group collects information from you when you purchase products or services from Dextra Group, including your name, email address, postal address, telephone number and job title.

We will use this personal information;

To carry out obligations arising from you purchasing our products or services. The lawful basis for processing your personal information for this purpose will be 'Contractual Need'

### **Contact us concerning the use of our products or services**

Dextra Group collects personal information from you when you use or contact us concerning the use of our products and services, including name, email address, postal address, telephone number and job title.

We will use this personal information;

To send you personalised communications which you have requested or may be of interest to you. These may include information about publications, events, surveys, product and service developments or promotions. The lawful basis for processing your personal information for this purpose will be 'Legitimate Interest'.

This personal information is not shared or made available to 3rd party recipients.

### **Attend or register to attend our events (such as CPD courses) or other events in which Dextra Group participates.**

Dextra Group collects personal information from you when you register at or register to attend an event hosted by or participated at by Dextra Group. The personal information collected will include your name, email address, postal address, telephone number and job title.

We will use this personal information;

To carry out obligations arising from being a registered attendee of our event or other events which Dextra Group attends, the lawful basis for processing your personal for this purpose will be 'Legitimate Interest'.

To send you personalised communications which you have requested or may be of interested to you. These may include information about publications, events, surveys, product and service developments or promotions. The lawful basis for processing your personal information for this purpose will be 'Legitimate Interest'.

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This personal information is not shared or made available to 3rd party recipients.

### **Supply product or services to Dextra Group**

Dextra Group collects information from you when you supply products and services to Dextra Group, including your name, email address, postal address, telephone number and job title.

We will use this personal information;

To carry out obligations arising from you providing us products and services. The lawful basis for processing your personal information for this purpose will be 'Contractual Need'

### **Individuals who applied to work for Dextra Group**

Dextra Group collects personal information from you when you apply to work for Dextra Group, including name, email address, postal address, telephone number, employment history, education history and details of referees. For application forms submitted via the company website, data will be stored securely on our data server and deleted 7 days after date of submission. Hard copies of application forms and CVs will be kept on file for up to 6 months and then destroyed. Please let us know in writing should you not wish us to store your details on our files.

We will use this personal information;

To complete the interview process, we will use your personal information to communicate with you, complete background checks where permitted by law and manage your application through the interview selection process. The lawful basis for processing your personal information for this purpose will be 'Contractual Need'.

### **Individuals who are current or former employee of Dextra Group**

Dextra Group collects personal information from you when you work for Dextra Group, including name, email address, postal address, telephone number, date of birth, employee identification number, bank details, national insurance number, next of kin and emergency contact details.

We will use this personal information;

To enable us to employ, pay and manage your work. The lawful basis for processing your personal information for this purpose will be 'Contractual Need'. In case of emergencies when we will utilise your emergency contact details. The lawful basis for processing your personal information for this purpose will be in the employees 'Vital Interests'.

In the case of death in service and if qualifying for death in service financial scheme we will utilise your next of kin contact details. The lawful basis for processing your personal information for this purpose will be in the employees 'Vital Interests'. To comply with applicable tax, employment health & safety laws. The lawful basis for processing your personal information for this purpose will be 'Compliance with Legal Obligations'.

### **3. How long is your personal information retained?**

We will retain and process your personal information as long as is needed to provide the product and services that you have selected to receive from us.

For personal information used by us for our own direct marketing purposes, we will retain the data whilst accurate and responsive.

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Personal information obtained from 3rd parties for the Dextra Group commercial dataset will be recompiled on a regular basis to ensure the data is fresh and relevant.

#### **4. Will my personal information be shared?**

We share information, including personal information with trusted third-party service providers, that we use to provide hosting and maintenance of our websites, event management, customer relationship management, payment processing, support, accounts, analytics and other services for us. We do not permit our third-party service providers to use the personal information that we share with them for their marketing purposes or for any other purpose than in connection with the services they provide to us.

To facilitate these services the personal information we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"), in order to conduct our business operations. In such cases a data processing agreement will be in place with the data processors and 3rd parties to ensure your personal information is processed in accordance with the Data Protection Act.

Dextra Group will in certain circumstance disclose your personal information if required to do so by law or in the good faith belief that such action is necessary to;

Conform to the edicts of the law or comply with legal process served on Dextra Group; Protect and Defend the rights or property of Dextra Group; and,

Act under exigent circumstances to protect the Personal safety of users of Dextra Group, or the public.

#### **5. How my personal information is kept secure?**

Dextra Group is committed to protecting the security of your personal information. We will use a variety of security technologies and procedures to protect your personal information from unauthorised access, use or disclosure. Although we will do our best to protect your personal information, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Dextra Group secures the personal information you provide on computer servers in a controlled, secure environment, protected from unauthorised access, use or disclosure. Dextra Group ensures personal information is protected through the use of encryption, such as the Secure Socket Layer (SSL) protocol, when transmitted to other websites.

#### **6. What are my choices with my personal information?**

Dextra Group is committed to providing you with control on how your data is used and processed. You can review, edit or delete your personal information free of charge by contacting us directly at [enquiries@dextragroup.co.uk](mailto:enquiries@dextragroup.co.uk), by telephone or via postal communication to the contact details provided in the section "Contact Us".

Your rights concerning your personal information are;

You can ask about the personal information we hold about you and we will show you You can request your personal information is corrected and we will update the details and inform you when completed

You can object to your data being processed and we will stop processing your data once no longer required for performance of contract or legal obligations.

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You can object to receiving direct marketing communications from us and we will stop all communications by email, post, telephone, SMS or within certain subject areas. In addition any direct marketing communication you receive from us will always include a clear, simple method to opt-out of future communications.

You can ask for your personal information to be erased, once no longer required for performance of contract or legal obligation, which we will complete bar keeping the minimal personal details to ensure we do not contact you again.

## **7. Data Breach Report Procedure**

This procedure outlines the measures Dextra Group plc takes against unauthorised or unlawful processing or disclosure and against accidental loss, destruction of or damage to personal data.

In the event of data being lost or shared inappropriately, we will take appropriate action to minimise any associated risk as soon as possible. This procedure applies to all personal and sensitive data held by all members of staff.

It is a regulatory requirement under GDPR to have consistent and effective governance and control arrangements to protect the personal data that we hold. This Data Breach Procedure sets out the course of action to be followed by all staff in the event of a real or potential data protection breach.

### **Definition of Data Breach**

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes. A personal data breach can be broadly defined as a security incident that has affected the confidentiality, integrity or availability of personal data.

Personal data breaches can include:

- Loss or theft of personal data and/or equipment on which data is stored
- Access by an unauthorised third party
- Computing devices containing personal data being lost or stolen
- Loss of availability of personal data
- Hacking or Cyber attack
- Equipment failure
- Unforeseen circumstances such as a fire or flood
- Flawed data destruction procedures.

### **Reporting a Data Breach**

As soon as any member of staff discovers or receives a report of a data breach, they must inform the Data Protection Manager as soon as possible and without delay. If the breach occurs or is discovered outside normal working hours, then notification should begin as soon as is practicable.

An emailed report can be submitted to the Data Protection Manager at [enquiries@dextragroup.co.uk](mailto:enquiries@dextragroup.co.uk) in the first instance and should include accurate details of the incident. An initial assessment of the data breach by the Data Protection Manager will ascertain as much information as possible about the incident in order to fully assess the impact of the data breach and determine actions required.

### **Managing a Data Breach**

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### Step 1: Containment and Recovery

1. The Data Protection Manager will ascertain the severity of the breach, whether any personal data is involved and whether the breach is still occurring.
2. If the breach is still occurring, the Data Protection Manager will establish what steps need to be taken immediately to minimise the effect of the breach and contain the breach from further data loss (e.g. restricting access to systems or close down a system etc).
3. The Data Protection Manager will consider and implement appropriate steps required to recover any data loss where possible and limit damage caused (e.g. use of backups to restore data; changing passwords etc.)
4. The Data Protection Manager will inform the Board of Directors if the severity and likely impact of the breach deems it necessary to inform the ICO of the breach. At the same time, depending on the nature of the breach, the Data Protection Manager may seek expert or legal advice and/or the Police if it is believed that illegal activity has occurred or likely to occur.
5. Where a significant breach has occurred, the Data Protection Lead will inform the ICO within 72 hours of the discovery of the breach.
6. The decision taken as to the reasons why a data breach is either reported or not reported is documented by the Data Protection Manager.

### Step 2: Assessment of Risk

Further actions may be needed beyond immediate containment of the data breach. To help determine the next course of action, an assessment of the risks associated with the breach is undertaken to identify whether any potential adverse consequences for individuals are likely to occur and the seriousness of these consequences.

The Data Protection Manager will consider the points arising from the following questions:

1. What type and volume of data is involved?
2. How sensitive is the data? Could the data breach lead to distress, financial or even physical harm?
3. What events have led to the data breach? What has happened to the data?
4. Has the data been unofficially disclosed, lost or stolen? Were preventions in place to prevent access/misuse?
5. How many individuals are affected by the data breach?
6. Who are the individuals whose data has been compromised?
7. What could the data tell a third party about the individual? Could it be misused regardless of what has happened to the data?
8. What actual/potential harm could come to those individuals? E.g. physical safety; emotional wellbeing; reputation; finances; identity theft; one or more of these and other private aspects to

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their life

9. Are there wider consequences to consider?

10. Are there others that might advise on risks/courses of action (such as banks if individual's bank details have been affected by the breach)?

### Step 3: Notification of Breaches

If the severity and likely impact of the breach warrants notifying the ICO, then we will notify the ICO within 24 hours of becoming aware of the essential facts of the breach (through the ICO's online portal at <https://report.ico.org.uk/security-breach/>). This notification will include at least:

- Our business name and contact details
- The date and time of the breach (or an estimate)
- The date and time we discovered it
- Basic information about the type of breach
- Basic information about the personal data concerned.

As we undertake a full investigation of the details of the breach, within 3 days of the initial notification, we will further provide the ICO with full details of the incident, the number of individuals affected and its possible effect on them, the measures taken to mitigate those effects, and information about our notification to the individuals affected.

There may be instances when the nature of the breach and the individual(s) affected may necessitate notifying third parties such as regulatory bodies, agencies, professional bodies as part of the initial containment. If the breach is likely to adversely affect the personal data or privacy of our staff we will notify them of the breach without unnecessary delay if we cannot demonstrate that the data was encrypted (or made unintelligible by a similar security measure).

We will inform them of:

- The estimated date of the breach
- A summary of the incident
- The nature and content of the personal data
- The likely effect on the individual(s)
- Any measures we have taken to address the breach
- How those affected can mitigate any possible adverse impact

### Step 4: Evaluation and Response

When the response to a data breach has reached a conclusion, the Data Protection Manager will undertake a full review of both the causes of the breach and the effectiveness of the response. The full review is reported to the Board of Directors for information and discussion as soon as possible after the data breach has been identified.

If through the review, systematic or ongoing problems associated with weaknesses in internal processes or security measures have been identified as a cause of the data breach, then appropriate action plans will be drafted, actioned and monitored to rectify any issues and implement recommendations for improvements.

The Board of Directors will be party to discussions regarding action plans and be able to monitor progress against the actions appropriately. If a breach warrants a disciplinary investigation, legal advice

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will be sought through Human Resources channels.

### **8. How we use cookies on our websites**

Dextra Group use 'cookies' to help personalise and enhance your online experience when visiting our websites.

A cookie is a text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you.

You can control the use of cookies at the individual browser level. If you elect not to activate the cookie or to later disable cookies, you may still visit our websites, but your ability to use features or areas of the website may be limited. For instructions on how to control, disable or delete cookies for your browser, please visit [www.aboutcookies.org](http://www.aboutcookies.org).

### **9. CCTV use in and around our premises**

Dextra Group has in place a CCTV surveillance system across its offices and manufacturing works based at Brickfields Business Park, Gillingham, Dorset. SP8 4PX.

The CCTV system is owned and managed by Dextra Group, under the Data Protection Act 1998 Dextra Group is the 'data controller' for the images produced by the CCTV system. Dextra Group are registered with the Information Commissioner's Office and our registration number is Z3430889.

Signs are placed around the site to inform both staff and visitors that CCTV is in operation. Cameras are sited to ensure that they cover Dextra Group premises as far as is possible. Cameras are installed throughout the site including roadways, car parks, buildings, within buildings and externally in vulnerable public facing areas. Cameras are not sited to focus on private residential areas.

The CCTV system is operational and is capable of monitoring for 24 hours a day, every day of the year.

The principle purposes of the CCTV system is for the prevention, reduction, detection and investigation of crime and other incidents, to ensure the safety of staff and visitors and to assist in the investigation of suspected breaches of company policy and the monitoring and enforcement of traffic related matters. Dextra Group seek to operate its CCTV system in a manner that is consistent with respect for individuals privacy.

Monitoring equipment and images that are generated are stored in a dedicated secure area which is only accessible by trained authorised personnel. Images generated are of a suitable quality for the specified purposes for which they were installed, all cameras are periodically checked that the images remain fit for purpose and that date and time stamps recorded onto the images are accurate. All images remain the property and copyright of Dextra Group.

The use of covert cameras will be restricted to rare occasions, where a series of criminal acts have taken place within a particular area that is not otherwise fitted with CCTV. Any use of covert cameras will be solely authorised by the Dextra Group Chairman. The Dextra Group Chairman should be satisfied that all other physical methods of prevention have been exhausted prior to the use of covert recording.

From the 25 May 2018, Dextra Group will comply with the General Data Protection Regulations with regards to its operation of a CCTV system. Due regard will be given to the data protection principles

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contained within Article 5 of the GDPR which provide that personal data shall be;

Processed lawfully, fairly and in a transparent manner.

Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

Accurate and, where necessary, kept up to date.

Kept in a form which permits identification of the data subjects for no longer than is necessary for the purposes for which the personal data are processed.

Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.

### **Applications for disclosure of images Applications by individual data subjects**

Requests by individual data subjects for images relating to themselves 'Subject Access Request' should be submitted in writing to Dextra Group's Data Controller together with proof of identification.

In order to locate the images on the system, sufficient detail must be provided by the data subject in order to allow the relevant images to be located and the data subject to be identified.

Where Dextra Group is unable to comply with a Subject Access Request without disclosing the personal data of another individual who is identified or identifiable from that information, it is not obliged to comply with the request unless satisfied that the individual has provided their express consent to the disclosure, or if it is reasonable, having regard to the circumstances, to comply without the consent of the individual. Access to and disclosure of images to third parties

In limited circumstances it may be appropriate to disclose images to a third party, such as when a disclosure is required by law, in relation to the prevention or detection of crime or in other circumstances where an exemption applies under relevant legislation. Such disclosures will be made at the discretion of the Data Controller, with reference to relevant legislation and where necessary, following advice.

Where a suspicion of misconduct arises and at the formal request of the Investigating Officer or HR Manager/Advisor, the Data Controller may provide access to CCTV images for use in staff disciplinary cases.

A record of any disclosure made under this policy will be held on the CCTV management system, itemising the date, time, camera, requestor, authoriser and reason for the disclosure.

Unless required for evidential purposes, the investigation of an offence or as required by law, CCTV images will be retained for no longer than 30 days from the date of recording. Images will be automatically overwritten after this point.

Where an image is required to be held in excess of the retention period referred to above, the Data Controller or their nominated deputy, will be responsible for authorising such a request. Images held in excess of their retention period will be reviewed on a three monthly basis and any not required for

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evidential purposes will be deleted.

Access to retained CCTV images is restricted to the Data Controller and other persons as required and as authorised by the Data Controller

Complaints concerning the Dextra Group's use of its CCTV system or the disclosure of CCTV images should be made in writing using the information in the Contact Us section. All appeals against the decision of the Data Controller should be made in writing to the Group Chairman using the information in the Contact Us section.

All staff involved in the operation of the CCTV System will be made aware of this policy and will only be authorised to use the CCTV System in a way that is consistent with the purposes and procedures contained therein. All staff with responsibility for accessing, recording, disclosing or otherwise processing CCTV images will be required to undertake data protection training.

### 10. Changes to this policy

Dextra Group will occasionally update this Privacy Policy to reflect company and customer feedback. Dextra Group encourages you to periodically review this policy to be informed of how Dextra Group is protecting your information.

### 11. Contact us

Dextra Group welcomes your comments regarding this Privacy Policy or about Dextra Group's privacy practices.

Please contact us by;

Email at [enquiries@dextragroup.co.uk](mailto:enquiries@dextragroup.co.uk)

Telephone +44 (0)1747 858 100

Post FAO : Data Protection Officer  
Dextra Group plc  
Brickfields Business Park  
Gillingham  
Dorset  
SP8 4PX

Name:..... Signed:..... Date:.....

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