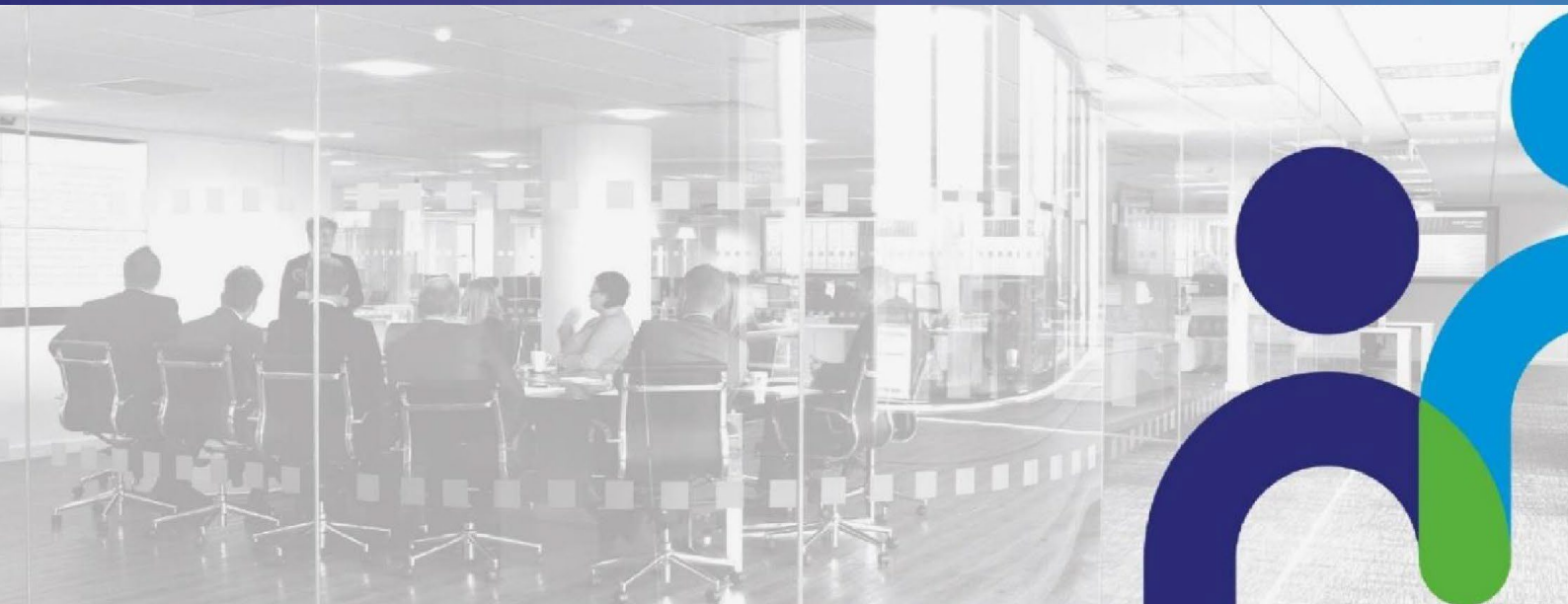


# Privacy Notice





<b>Current Version</b>	Privacy Notice – v2.0	June 2024
<b>Review Date</b>		

At Sec Watchdog Limited, trading as Matrix Security Watchdog, we’re committed to ensuring that your personal information is protected. Your privacy is important to us and right at the heart of our business.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

## Contact Us

Matrix Security Watchdog's Data Protection Officer (DPO) can be contacted by email at [privacy@teammatrix.com](mailto:privacy@teammatrix.com).

Matrix Security Watchdog is registered at 2nd Floor Partis House, Davy Avenue, Knowlhill, Milton Keynes MK5 8HJ No. 14616198. Our ICO registration number is ZB557376.

## How we process your personal data as a data controller

When using the term “personal data” in this Privacy Notice, we mean information that relates to you and from which you could be identified, either directly or indirectly in combination with other information which we may have in our possession.

Where we act as a data controller, we may collect, store, and use the following kinds of personal information:

<b>Purpose</b>	<b>Personal data</b>	<b>Lawful basis</b>
Pre-contractual discussions and onboarding	Contact details including name, email address, contact number and job title.	Contractual obligation
To register you as a user on our client portal	Contact details including name, email address, contact number and job title.	Contractual obligation
Send statements and invoices to you, and collect payments from you via the website	Contact details including name, email address, contact number and job title. Transactional details	Contractual obligation
To manage our relationship with you which may include: 1. Notifying you about changes to our terms or privacy notice 2. Asking you to leave a review or take a survey	Contact details including name, email address, and contact number.	Contractual obligation Legal obligation Necessary for our legitimate interests (to ascertain how clients use our products/services and



		related feedback to make improvements)
To administer our business and our website, including improving and securing our website	Contact details IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views, website navigation	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security)
To send you marketing emails and general correspondence	Contact details	Necessary for our legitimate interests (to keep our clients up to date with our services)
To ensure security on our client portal	IP address and user ID	Necessary for our legitimate interests (for the provision of IT services, network security)

### How we process your personal data as a data processor

Where we are acting as a data processor on behalf of the client (the data controller), we may collect, store, and use the following kinds of personal information:

**Information provided to us for the purpose of carrying out employment screening and related services directly with us may include, but is not limited to:**

- full name (including previous and aliases)
- date of birth
- current address (and address history)
- email address
- contact numbers
- gender
- place of birth
- National Insurance number
- copies of ID documentation such as passport and/or driving license, and the information contained within them (e.g., passport number, driving license number, etc.)
- nationality (at birth and current)
- employment history (including gaps)
- educational and professional qualifications
- financial information such as transactional data and details of bankruptcy, CCJs, where applicable
- directorships and sanctions data.

Information gathered is strictly related to the level of screening being carried out, or the level of identity verification required by our clients to meet their regulatory obligations. No unnecessary information is obtained from data subjects that is not specifically required for the purpose of the checking process.

The employment screening background checks conducted on behalf of a client may include, but is not limited to:



- to verify that that you are eligible to work in the UK via a certified Identity Service Provider (IDSP), where applicable.
- to verify your identity via a certified Identity Service Provider (IDSP), where applicable.
- to obtain references relating to employment history, education, professional qualifications and personal references.
- to verify your employment (and/or gap employment) via the use of Open Banking
- to carry out fraud checks, UK, and international criminal checks.
- to conduct credit checks, financial probity checks, UK, and international sanctions checks.
- to carry out adverse media, social media checks and Politically Exposed Person (PEP) checks
- a search using your information to identify any past, present, or disqualified directorships.

**Report adverse findings to the client:** in line with our contractual obligations and agreed risk framework. This may include your name, case number, email address and job title.

**To provide monthly reports to the client:** in line with our contractual obligations and as agreed with the client. This may include your name, case number, email address and job title.

**Contacting us for an enquiry/information:** if you contact us directly through the website or otherwise with regard to your screening application. This may include your name, case number, email address and contact number.

**General correspondence:** we may collect personal information when you contact us either on the telephone or in writing. This may include your name, case number, email address, contact number and information relating to your screening application.

**Communications relating to your screening application :** we may send you SMS and/or email alerts in line with our contractual obligations. This may include your name, case number, email address and/or contact number.

## **Our lawful basis for processing**

It is not our responsibility to determine the lawful basis for processing your personal data where we are acting on the client's instructions. As a data controller, the client will determine the lawful basis, purpose and reason for data processing. However, all processing of personal data by Matrix Security Watchdog is carried out with the full and explicit authorisation of each data subject. This authorisation does not alter the lawful basis for processing determined by our client.

## **How we collect your personal data**

Different methods may be used to collect personal data about you, including:

**Direct interactions:** You may provide us with your information by filling in the forms on our website or our product portal or by corresponding with us by telephone, post, email or otherwise.

**Client:** Where the client instructs Matrix Security Watchdog to carry out the checks, they may provide your contact details to enable us to initiate the checks.

**Referees:** We may contact your previous employer and/or education provider to confirm details of your activity history.

**Third parties:** We may also collect personal data about you from our trusted third-party suppliers and publicly available sources to enable us to carry out the screening checks on behalf of the client.

## **Who we share your personal data with**



We may disclose information about you to any of our employees insofar as reasonably necessary to fulfil our obligations for the purposes as set out in this privacy notice.

Whilst undergoing employment screening, we may share your data with our (sub-)processors, who we instruct to carry out the following services on our behalf:

- UK and/or international criminality checks
- UK and/or financial probity checks
- Digital Right to Work and/or identity checks
- Education verification checks
- Employment verification checks (which may also include OpenBanking)
- Sanctions, Politically Exposed Persons (PEPs), directorship and adverse media checks
- Identity and address checks for AML and KYC purposes
- Social media checks
- Provision of inbound/outbound mail services

Your data will also be shared with referees declared by yourself in your screening application and with the client. In some circumstances, your data will also be shared with DocuSign for the purpose of obtaining signature from yourself, either to enter into a contract with Matrix Security Watchdog (as a client), or to proceed with your screening application (candidate).

In addition, we may disclose your personal information:

- to the extent that we are required to do so by law
- in connection with any legal proceedings or prospective legal proceedings
- in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk); and
- to the purchaser (or prospective purchaser) of any business or asset which we are (or are contemplating) selling.

Except as provided in this privacy statement, we will not provide your information to third parties.

## **International transfers**

Matrix Security Watchdog processes personal data in its operations centre based in the UK. All personal data is stored in a cloud-based solution managed by Microsoft Azure and based in the UK.

Based on the international demographic of candidates and applicants it may be necessary to transfer elements of personal data to countries for the purposes of conducting background, criminal record, and identity checks, including the United States and other countries which do not have data protection laws equivalent to those in force in the European Economic Area or the UK. For the avoidance of doubt, data will be transferred to The United States where you are undergoing international criminality checks.

Matrix Security Watchdog has undertaken appropriate assessments to determine whether the international data transfer provides an adequate level of protection to candidates. We will only transfer personal data outside the UK where we are satisfied that the third country is able to provide such protection.

Matrix Security Watchdog is committed to using appropriate transfer tools permitted under the UK GDPR in all contracts where data may be transferred outside of the EEA and UK or as otherwise required.

## **How long we store your data**

Matrix Security Watchdog has a Data Retention Policy which mandates how long records, including personal data, must be retained.



Where we are acting as a data processor, Matrix Security Watchdog retains your personal information for only as long as stipulated within client contracts. Typically, cases relating to employment screening candidates are retained for 6 - 36 months from the date of completion, unless requested otherwise by the client.

## Your rights

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal data.

**Your right to rectification** - You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal data in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal data in certain circumstances.

**Your right to object to processing** - You have the right to object to the processing of your personal data in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances.

**Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent.

You don't usually need to pay a fee to exercise your rights. If you make a request, we have one calendar month to respond to you.

If you want to exercise any of the above rights, please contact the DPO at [privacy@teammatrix.com](mailto:privacy@teammatrix.com). Please note that exemptions set out in the Data Protection Act 2018 may apply meaning that we do not have to grant your request in full. However, we will always meet your request as far as we are able to.

## What we may require from you

We may need to request specific information from you to help us confirm your identity and ensure your right to exercise any of your 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.

## Your right to complain

If you have any concerns or complaints regarding the processing of your personal data, or our compliance with the UK GDPR and Data Protection 2018, you should contact the DPO at [privacy@teammatrix.com](mailto:privacy@teammatrix.com).

You also have the right to lodge a complaint with the Supervisory Authority Their contact details in the UK are:

- Website: [www.ico.org.uk](http://www.ico.org.uk)
- Telephone: 0303 123 1113
- Postal address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

## 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 DPO at [privacy@teammatrix.com](mailto:privacy@teammatrix.com).