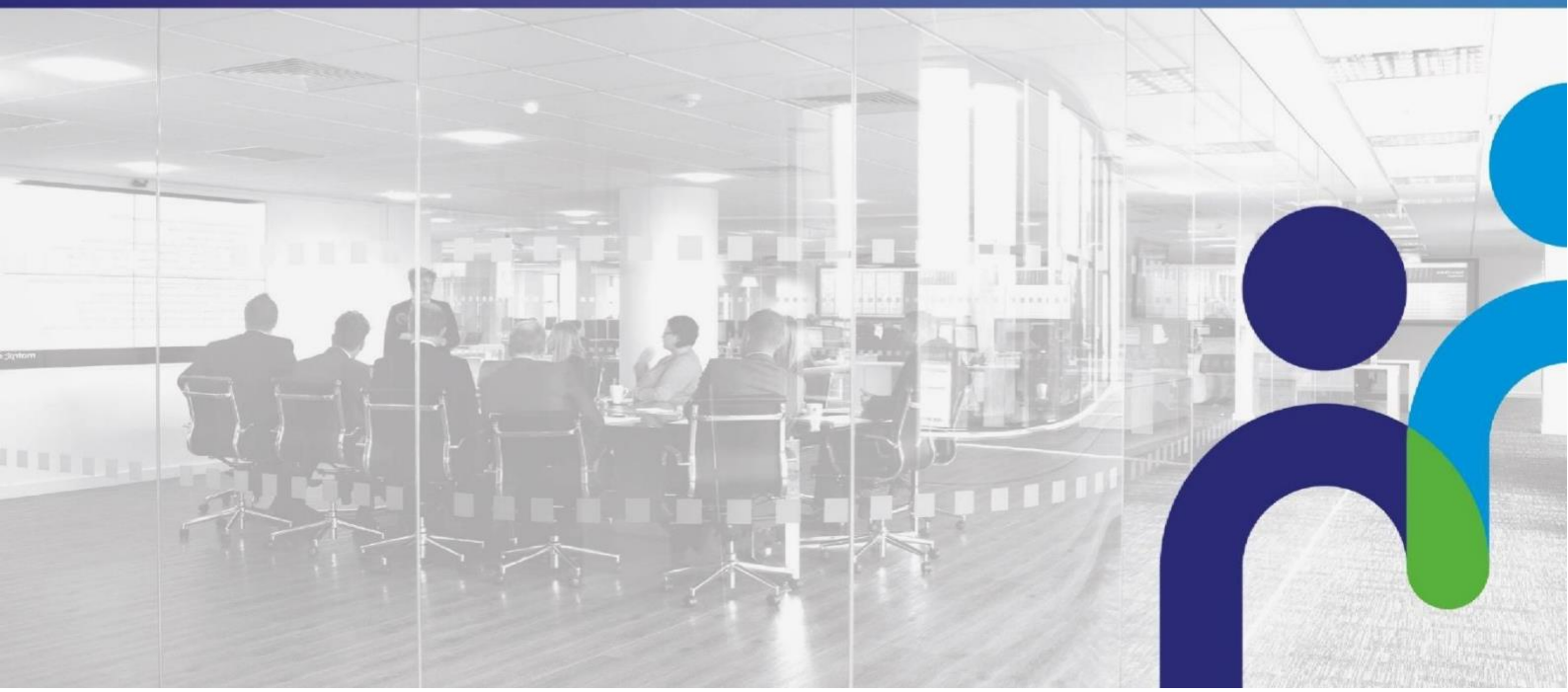


eBulk Privacy Notice





Current Version	MSW eBulk Privacy Notice – v1.0	April 2024
Review Date		

Purpose and Scope

Sec Watchdog Limited, trading as Security Watchdog, is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the UK General Data Protection Regulation (UK GDPR).

It is important that you read and retain this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using that information and what your rights are under the data protection legislation.

Data Protection Officer

We have appointed a Data Protection Officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO at privacy@teammatrix.com.

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

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

Purpose	Personal data	Lawful basis
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	Contractual obligation



	and job title.	
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 relating to your eBulk online application



Criminal record checks with the Disclosure and Barring Service (DBS), Disclosure Scotland and Access NI

- 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)
- job title
- IP address
- criminal offence and conviction data

Digital Identity and Right to Work checks to verify that that you are eligible to work in the UK via a certified Identity Service Provider (IDSP), where applicable

- full name (including previous and aliases)
- date of birth
- current address
- email address
- 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
- photograph
- IP address

Social media checks

- full name (including previous and aliases)
- date of birth
- email address
- gender
- nationality
- current address
- details of employment including job title, job industry and current/previous employers
- special category data may be indirectly processed when carrying out the social media checks. This type of data may potentially be processed by Security Watchdog where the social media check providers include evidence in a report which is relevant to the check.



In addition to carrying out the relevant checks, your personal data may also be processed for the following purposes:

- *Report adverse findings to the client:* in line with our contractual obligations and agreed risk framework. This may include your name, 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 eBulk application. This may include your name, 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, 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, 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 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.

If you fail to provide personal information

If you choose not to provide personal information or authorisation, we will be unable to carry out our checks and therefore unable to start the employment screening or identity checking process. Where clients have made employment screening conditional upon the issuance of an employment contract there may be implications for failing to complete the employment screening process. Security Watchdog takes no liability in the failure for individuals to engage with any employment screening or identity checking process on behalf of a 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 eBulk, or by corresponding with us by telephone, post, email or otherwise.

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

Third parties: We may also collect personal data about you from our trusted third-party suppliers 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 statement.

Whilst undergoing employment screening via eBulk, we may share your data with our sub-processors, in relation to the following purposes:

- UK criminality checks such as the Disclosure and Barring Service (DBS), Disclosure Scotland and Access NI.
- Digital Right to Work and/or identity checks
- Social media checks
- Provision of inbound/outbound mail services

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

We do not routinely transfer your personal data outside the EEA in relation to eBulk services.

Data retention

We will only retain your personal information for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting or reporting requirements. Typically, cases relating to employment screening candidates are retained for 3 years from the date of completion, unless requested otherwise by the client.

Further details of retention periods for different aspects of your personal information are available in our Data Retention Policy.

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. 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.

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
- 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.