

## Supply Chain Privacy Notice

### PURPOSE

This document details the Supply Chain Privacy Notice for Kane Group Building Services (further referred to as 'Kane Group' for the remainder of this document), registered at Unit 18-19, Scarva Road Industrial Estate, Scarva Road, Banbridge, Co. Down, Northern Ireland, BT32 3QD.

This notice ensures that Kane Group apply appropriate measures to comply with the principles of the General Data Protection Regulation (GDPR) 2018.

### PROCEDURE SUMMARY

Kane Group is committed to upholding the principles of GDPR when processing personal data. According to Article 5 of the GDPR, personal data shall be:

- i) Processed lawfully, fairly and transparently.
- ii) Collected for specified purposes, and not processed for other purposes.
- iii) Just the right amount of data for the task at hand – not too much, but enough to do the task accurately.
- iv) Accurate and up to date.
- v) Kept no longer than necessary.
- vi) Processed securely.

### BACKGROUND / SCOPE

To operate effectively, Kane Group needs to hold certain information about supply chain partners and other identified third parties with whom we do business.

### APPLICABILITY

### EXCLUSIONS / EXCEPTIONS

No exclusions.

### PROCEDURE DETAILS

<b>A. Policy Statement</b>	1.1	Kane Group regards the lawful and correct treatment of personal information as very important to successful operations and to maintaining the confidence of those with whom we deal.
	1.2	We will always do our utmost to ensure that our organisation treats personal information with respect, lawfully and correctly.
	1.3	To this end we fully endorse and adhere to the Principles of Data Protection as detailed in the General Data Protection Regulations.name and contact details of next of kin.

<b>B. Why do you need to read this?</b>	<p>1.1 When you enter in to dealings with Kane Group, you may be providing us information in a variety of ways as described in this policy (Personal Data).</p> <p>1.2 It is a condition of undertaking business with Kane Group that you need to review and understand the content of this notice, and that you agree to how we use your data for our legitimate business purpose.</p> <p>1.3 In the unlikely event that we consider that potential use of data may be more intrusive, or where the provision and use of information is optional, then we will ask you to specifically consent to the collection and use of this information by direct indication (tick box).</p>
<b>C. What Information We Will Collect and How We Will Use It</b>	<p>1.1 We will collect and process the obvious information you provide to us by:</p> <ul style="list-style-type: none"> <li>• Registering with us as a supply chain partner</li> <li>• Corresponding with us by phone, e-mail or otherwise.</li> </ul> <p>1.2 In these situations, you are aware what information you are providing to us, and why we need the information, as you are requesting us to use the information to fulfil your request. For clarity, this information may include the following:</p> <ul style="list-style-type: none"> <li>• Your Name</li> <li>• Your company name(s).</li> <li>• Your company address(s)</li> <li>• Your company e-mail address(s).</li> <li>• Your telephone and/or mobile telephone number.</li> <li>• Details of services and/or products you provide.</li> <li>• The terms and conditions of your contract.</li> <li>• Copies of e-mail correspondence and hardcopy correspondence</li> <li>• Site Induction and training history</li> <li>• Information about your right to work in United Kingdom</li> <li>• Copies of qualifications, CSR card information, health and safety records</li> <li>• Your company bank account details.</li> </ul> <p>1.3 Kane Group does not process special categories of personal data i.e. particularly sensitive information about its supply chain at any point, such as ethnic origin, sexual orientation or religious and/or political beliefs.</p>
<b>D. How do we collect information?</b>	<p>1.1 Kane Group collects this information in a variety of ways. For example, data is collected through enquiry telephone calls, e-mails, meetings, and from correspondence with you throughout the inquiry, order, delivery and invoicing</p>

process.

<b>E. Why does Kane Group need to process personal data?</b>	<p>1.1 Kane Group needs to process supply chain data to consider whether to enter into a contract or, following the placement of a contract with a supply chain partner(s) to meet its obligations under this contract. For example, Kane Group needs to process supply chain partner data for banking purposes, and to contact supply chain partners during contracted works for progress updates and/or any other relevant information Kane Group wish to enquire about.</p> <p>1.2 In some cases, Kane Group needs to process data to ensure that it is complying with its legal obligations. For example, to comply with Health and Safety laws such as cleaning service COSHH assessments. In other cases, Kane Group has a legitimate interest in processing supply chain data before, during and after the end of the contracting relationship.</p> <p>1.3 Processing supply chain partner data allows Kane Group to:</p> <ul style="list-style-type: none"> <li>• Maintain accurate and up-to-date supply chain records and contact details</li> <li>• Ensure that supply chain staff have the right skills, training and qualifications to comply with relevant regulatory requirements and standards for the works</li> <li>• Assist in improving the services of the company</li> <li>• To verify that you have the legal right to work on our sites or provide services on our behalf</li> <li>• Pay supply chain partners in accordance with their payment terms</li> <li>• Operate and keep a record of supply chain spending to inform current and future company budgets</li> <li>• Ensure effective general business administration</li> <li>• Ensure compliance with Health and Safety legislation</li> <li>• Respond to and defence against legal claims</li> </ul> <p>1.4 Whilst Kane Group relies on legitimate interests as a reason for processing data, we have considered whether those interests are overridden by the rights and freedoms of supply chain partners and have concluded that they are not.</p>
<b>F. Do you have to provide personal data?</b>	<p>1.1 You have some obligations under your contract agreement to provide Kane Group with relevant data in order for us to enter into a contract with you.</p> <p>1.2 In particular, you are required to provide relevant and accurate contact details and invoicing details and it is in your best interests to provide all relevant information pertaining to your services.</p> <p>1.3 Failing to provide this data may mean that we are unable to fulfil our contractual obligations to you.</p>
<b>G. Do Any Other Parties Have Access to my</b>	<p>1.1 We disclose supply chain data for the purposes of operational use with Kane Group employees, including the Directors, the company Managers, Technical,</p>

<b>Information?</b>	Administration and Finance teams.
1.2	The exception to this is where you are, or are potentially providing services to another client, through us. In these circumstances, we will provide required information to allow them and us to make an informed decision on the suitability of products or services.
1.3	If necessary, Kane Group will share your data with third parties such as solicitors and Courts in relation to disputes, or with third parties that process data on our behalf, such as for the purposes of end of year accounting.
1.4	Kane Group will never sell your details to a third party or transfer your data to countries outside the European Economic Area.
<b>H. How does Kane Group protect your personal data?</b>	<p data-bbox="461 792 1485 967">1.1 Kane Group takes the security of your data very seriously. We have internal policies and controls in place to ensure as is reasonably practicable that your data is not lost, accidentally destroyed, misused or disclosed to irrelevant third parties and that your data is only accessed and used by Kane Group employees in the performance of their duties.</p> <p data-bbox="461 1003 1449 1137">1.2 Electronic supply chain partner data is stored securely via a secure server and password protected systems. Financial information is also stored within Kane Group's own systems. Hardcopy information is locked away when not in operational use. Data is subject to restricted access as appropriate.</p> <p data-bbox="461 1173 1485 1317">1.3 Where Kane Group engages third parties to process personal data on its behalf in the course of its business operations, such parties do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate measures to ensure the security of data held.</p>
<b>I. Where is Data Stored and For How long?</b>	<p data-bbox="461 1393 1050 1420">1.1 All data we collect will be stored in the UK.</p> <p data-bbox="461 1456 1497 1630">1.2 Where clients or customers have services provided outside of the UK, and we are required to provide them with information, we will ensure they are contractually bound to take all reasonable steps to ensure that data is treated securely, in accordance with data protection regulations and in compliance with this policy.</p> <p data-bbox="461 1666 1134 1693">1.3 We will only store data for as long as is necessary.</p> <p data-bbox="461 1729 1497 1944">1.4 Kane Group will hold your data for the duration of the contract between us. The periods for which your data is held after the end of the contract is dependent upon the service requirements of the company. If we use a supply chain partner once a year we will maintain your details on our list of approved supply chain partners. Any service used less than once a year will be removed from the list one year after the last action of the contract.</p> <p data-bbox="461 1980 1485 2076">1.5 The keeping of data relating to potential supply chain partners will be reviewed by Kane Group each year during an internally agreed set period. Any supply chain partner's details or marketing literature deemed irrelevant during the</p>

review process will be destroyed via shredding and/or deletion from the system/supply chain list.

## J. Your Rights

- 1.1 You have the right to ask us not to process your data for marketing or research at any time. If you have previously indicated that you are happy to participate, but change your mind, please inform us.
- You have the right to access information we hold about you. Simply e-mail us and we will advise you how to do this.
  - You have the right to correct information if it is wrong. Please e-mail us to advise and correct information.
  - If you have any concerns about the data information held, please contact us and we will make every effort to amend or remove to satisfy your requirements.
- 1.2 Remember that you may contact the Information Commissioners Office (ICO) for further information or to make a complaint.
- 1.3 The correspondence address for all GDPR requests is [dataprotection@kanegroupbs.com](mailto:dataprotection@kanegroupbs.com)

## K. Changes to the Supply Chain Privacy Policy

- 1.1 We may modify our Supply Chain Privacy Notice from time to time at our sole discretion; if so, we will post a revised version on our webpage ([www.kanegroupbs.com](http://www.kanegroupbs.com)). We urge you to check this webpage regularly to obtain the most up to date copy. Modifications will be effective as soon as they are posted on our website.

### DEFINITIONS

Term / Acronym	Definition
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<b>Definition of Supply Chain</b>	Kane Group defines a supply chain partner as a person or organisation that provides something that the company needs, such as a product or service. On entering into a contract with us, you trust us with your personal information.
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### ROLES AND RESPONSIBILITIES

Entity / Personnel	Responsibilities
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<b>Kane Group</b>	Ensure that policy and procedure is carried out in accordance to the requirements.
<b>Supply Chain</b>	Supply Chain must read and understand the policy whilst supplying Kane Group Building Services.

### RELATED DOCUMENTS, TOOLS AND TEMPLATES

Policies & Procedures	Location
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