



# Data Protection Policy

## Purpose of this Policy

SBC Systems (UK) Ltd needs to collect, hold, process and disclose certain types of Personal Data in the conduct of its business. This document sets out the Data Protection Policy which SBC Systems (UK) Ltd, its employees, related companies and agents apply to any Client's or prospective Client's, personal data (including that of their own clients, their employees and their agents).

Our Data Privacy Policy is in accordance with the Data Protection Act 1998. Details of the purposes for which we handle Personal Data, and a general description of the categories of people and organisations to whom we may disclose it, are formally documented in the Data Protection Register.

Unless you tell us otherwise, by providing us with any Personal Data, you are agreeing to our handling that Personal Data in accordance with this policy.

## Relevant Data Categories

This policy applies to all Personal Data regardless of the media it is held on (e.g. computer, paper, audio/video tape, etc). The Personal Data we may collect includes such things as contact details, employment details and other personal data contained in a typical employee personnel file. The nature of our business also requires us to collect Sensitive Data from our prospective Associates. Sensitive Data is a specially protected category of Personal Data, and is subject to additional procedures, described in the next section. Sensitive Data is data about an individual's racial or ethnic origin, political opinions, religious beliefs, trade union membership, physical or mental health, sex life, details of the commission or alleged commission of any offence and details of any court proceedings relating to the commission of an offence.

## Our Undertakings With Regard to Handling Personal Data

SBC Systems (UK) undertakes that any Personal Data which it handles will be handled in accordance with the following eight principles of Data Protection as set out in the UK Data Protection Act 1998.

1. ensure any Personal Data is fairly and lawfully gathered and processed
2. gather and process Personal Data only for those purposes necessary for the company to conduct its business, or execute its legal obligations, and not in any other way which would be incompatible with those purposes
3. gather and process only enough Personal Data to be adequate and relevant for the purpose and not excessive in frequency or volume
4. ensure that any Personal Data that needs to be retained and processed over time is accurate and kept suitably up to date
5. ensure that any Personal Data is not kept for longer than is allowed or required by law



6. process Personal Data in line with the rights of the individual whose personal data it is (“data subject”) – for example, in respect of privacy, discrimination, security, etc
7. keep all Personal Data securely and ensure copies of media containing any Personal Data are disposed of in a secure manner
8. ensure that any Personal Data processed by the company is not transferred to another country without there being protection in place equivalent to the currently in force provisions of the UK Data Protection Act, or otherwise ensure that permission of the relevant “data subject” to transfer their data abroad has been obtained

When we collect Sensitive Data, we will take steps to ensure that we have explicit prior consent to hold, process and, where appropriate (and legally permissible), disclose such information to third parties in the conduct of our business.

SBC Systems (UK) Ltd will ensure that any authorised agents or related companies assisting SBC Systems (UK) Ltd in the conduct of our business will adhere to this policy or will have in place their own equivalent Data Privacy Policy providing at least the same level of protection. In particular, SBC Systems Company Ltd in the USA, which in the conduct of our business we will need to disclose and transfer data to, explicitly adheres to standards of data protection equivalent to those in the European protocol.

In accordance with the UK Data Protection Act, SBC Systems (UK) may transfer or disclose personal data for the purposes set out above to any country within the European Economic Area. Countries outside the European Economic Area may not have equivalent regulations regarding the processing of personal data. When we transfer data outside the European Economic Area we will seek to contractually obligate the receiving party to adhere to UK data protection standards. Where we have not achieved that contractual obligation, we will always seek your explicit prior authorisation for transferring your personal data to such countries, and will take reasonable steps to ensure that your personal data privacy is adequately protected.

### **Our Purpose for Handling Personal Data**

SBC Systems (UK) Ltd handles Personal Data, for the purpose of carrying out our business of implementing, operating and supporting computer systems for our clients or as otherwise required by law. This includes the following activities:

- Holding and processing (only, not gathering or owning) our clients’ data in line with our commitments to them to implement, operate or support computer systems that contain personal data of their employees or of their own clients’ employees (the role and responsibility of being Data Owner or gatherer always remains with our clients)
- Disclosing or transferring our clients’ data to our related companies or other agents in order for them to assist us in carrying out our commitments to implement, operate or support said computer systems
- Collecting, holding and processing personal data related to our clients or prospective clients for the purpose of marketing and selling our business services to them
- Disclosing or transferring client or prospective client personal data to our related companies or other agents in order for them to assist us with our marketing and sales objectives



If we handle personal data for any other reasons except those set out above, we shall inform the relevant parties of our additional purposes.

### **Right of Access**

Under the Data Protection Act, any individual may write to the SBC Systems (UK) Ltd Data Protection Officer at our registered address and request a copy of the information which we hold about him or her. We reserve the right to charge up to the maximum fee payable in terms of the Data Protection Act for providing this information. If for any reason the data held is found to be inaccurate an individual can ask us to amend it and we will comply with any such requests as a matter of urgency.

### **Policy Administration**

If you have a complaint, question, or a wish to change the way we handle your Personal Data, you may notify your usual SBC Systems (UK) contact or write directly to:

Data Protection Officer  
SBC Systems (UK) Ltd  
4<sup>th</sup> Floor,  
7, St Helen's Place  
London  
EC3A 6AU