

Mitie Privacy Notice

Mitie is committed to complying with its legal obligations under the General Data Protection Regulation 2016 (“GDPR”) and to the protection of the rights and freedoms of individuals whose personal data Mitie obtains or generates as part of its business operations.

This policy describes how and why we collect, store and use personal data and also provides information about individuals’ rights. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

In this policy “we”, “us” and “our” means Mitie Shared Services Limited and any other the Mitie group company responsible for any personal information collected about you.

What personal data do we collect and process?

In order for us to operate our business we need to collect personal data from those who access our websites or premises, obtain products or services from us, provide products or services to us, are engaged by us or who we otherwise have dealings with in the course of our day to day activities.

We are committed to ensuring that the personal data we collect and use is appropriate for this purpose and does not constitute an invasion of an individual’s privacy. This section sets out further details of the types of personal data we collect in different circumstances and how it is used by us.

Visitors to www.mitiesourcing.com and our other websites

If you visit our websites your personal data including your name, email address, telephone number and other contact information will be collected if you register to use the website (where registration is required), subscribe to one of our services, post material or request further services. We may also ask you for information if you report a problem with a website.

We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.

We may collect details of your visits to our websites including traffic data, location data, weblogs and other communication data as well as details of the resources that you access. We may also collect information about your computer including, where available, your IP address, operating system and browser type. This information is used for system administration and to report aggregate information to our advertisers.

We use information held about you in the following ways:

- To ensure that content from our websites is presented in the most effective manner for you and for your computer.
- To provide you with information, products or services that you request from us.
- To carry out our obligations arising from any contracts entered into between you and us.

- To allow you to participate in interactive features of our service, when you choose to do so.
- To notify you about changes to our service.
- Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. A copy of our Cookie Policy can be found at <https://curtisfitch.com/cookie-policy/>

In addition, if you have signed up to attend one of our events, access publications or receive our marketing materials we may use your information as set out in the Business Contacts section below. If you do not want us to use your data in this way contact us at privacyoptions@mitie.com.

In addition, as a current or potential service provider, subcontractor, contractor or supplier to Mitie we may collect your personal data including name, email addresses, telephone numbers and other business contact information for the purposes of receiving services or quotations, managing relationships, providing services to our clients and operating our business.

We may use and disclose the information we collect in such manner as we believe to be necessary to enable us to carry out our business and to receive the services being provided. This includes the use of personal information:

- In connection with billing, invoicing, payment and legal enforcement.
- To manage our relationship with you and any organisation you represent.
- To enable us to conduct due diligence and risk assessment of our supply chain.
- To enable us to conduct sourcing activity including but not limited to quotations, tenders and auctions.

Basic personal data will be used by our transactional finance partners in Genpact International Inc., for billing, invoicing and payment purposes. The services Genpact provide to us are delivered from their service centre in Kolkata, India.

Your rights as a data subject

As a data subject you have certain rights which you may exercise if we are in possession of, or are processing, your personal data. Specifically:

- **Right of access** – you have the right to request a copy of the information that we hold about you.
- **Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- **Right to be forgotten** – you have a right, in certain circumstances, to ask for the data we hold about you to be erased from our records.

- **Right to restriction of processing** – where certain conditions apply you have a right to restrict the processing of your personal data.
- **Right of portability** – you have the right to have the data we hold about you transferred to another organisation.
- **Right to object** – you have the right to object to certain types of processing such as direct marketing.

To exercise these rights please contact us using the contact details set out in the Contact Information section below. In the event that Mitie refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in the Complaints section below.

On what basis do we process personal data?

We will only process personal data where we have a lawful basis on which to do so. The lawful basis on which data is processed will depend on the nature of the information collected and the purposes for which it is used by us but will be one or more of following:

- **Consent:** you have provided your consent for us to process their personal data for a specific purpose.
- **Contract:** the processing is necessary for a contract you have with us or because you have asked us to take specific steps before entering into a contract.
- **Legal obligation:** the processing is necessary for us to comply with our legal obligations.
- **Vital interests:** the processing is necessary to protect someone's life.
- **Legitimate interests:** the processing is necessary for our legitimate interests or the legitimate interests of a third party.

For how long do we hold personal data?

Mitie will only retain personal information for the period necessary to fulfil the purposes for which it is collected and processed, or for such shorter or longer period as may be prescribed by applicable law or Mitie's internal policies and procedures. Further information on our retention policy can be requested by contacting us via the information provided in the Contact Information section below.

Transferring and storing your data

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"), including the United States of America. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, amongst other things, the fulfilment of orders, the processing of payment details or the provision of support services. By submitting your personal data to us, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Notice.

Information provided via our websites

All information provided via www.mitiesourcing.com is stored on secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; 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.

Public forums

The site may, from time to time, make message boards, news groups, chat rooms and/or other public forums available to its users. Any information that is disclosed in these areas becomes public information and you should exercise caution when using these and never disclose your personal information.

Disclosure of your information

We may disclose your personal information to any member of our group, which means Mitie Group plc, its subsidiaries and subsidiary undertakings from time to time (as defined in the Companies Act 2006).

We may also disclose your personal information to third parties in certain circumstances including:

- We may provide personal data to clients, third party suppliers, service providers, professional advisors and other business partners to enable us to provide or receive products or services.
- In connection with the administration and operation of our business we may provide personal data to third parties who provide support services including IT, finance and accounting and HR services and research, marketing, business development and consultancy services.
- In the event that we sell or buy any business or assets, we may disclose your personal data to the prospective seller or buyer of such business or assets.
- We may disclose or share your personal data if we are under a duty to do so in order to comply with any legal obligation or where necessary to enforce any legal right or contractual agreement, or to protect the rights, property, or safety of Mitie, our employees, customers, or others. This includes exchanging information with other companies, organisations and bodies for the purposes of fraud protection and credit risk reduction.

Links to other websites

Our websites may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites

have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Changes to our Privacy Notice

This Privacy Notice was last updated in May 2018. Any changes we may make to our Privacy Notice in the future will be posted on this page and we suggest that you check back frequently to see any updates or changes.

Contact information

Our Data Protection Officer is responsible for the management of personal data within Mitie and for ensuring that compliance with data protection legislation and good practice can be demonstrated. Questions, comments and requests regarding this Privacy Notice or our collection or use of personal data should be addressed to:

The Data Protection Officer

Mitie

Level 12, The Shard

32 London Bridge Street

London SE1 9SG

Email: Privacy@mitie.com

We may use the information we collect to provide you with information on events, publications, products or services that we feel may interest you. You may specify your contact preferences when you register to attend an event or receive communications, products or services from us. You can also change your contact preferences at any time using the options which can be found on relevant communications or by contacting us directly at privacyoptions@mitie.com.

Complaints

If you wish to make a complaint about how your personal data is being processed by us (or the third parties referred to in this Privacy Notice), or how your complaint has been handled, you have a right to lodge a complaint with our Data Protection Officer using the contact details above or by contacting:

The Information Commissioners Office

Wycliffe House

Water Lane

Wilmslow

Cheshire SK9 5AF

Email: casework@ico.org.uk