

Eden Nuclear and Environment Ltd respects your privacy and is committed to protecting your personal data. This privacy policy will inform you about how we look after your personal data; tell you about your privacy rights and how the law protects you. It applies to information we collect in relation to:

- Our clients and other people who use our services.
- Employees or representatives of organisations who use our services or supply us with goods or services.
- Our employees.
- Users of our website.
- Professional advisers.
- People who contact us via any method (e.g. by post, email, telephone or social media).

It is important that you read this policy, 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 such information. This privacy policy is additional to other privacy notices and is not intended to override them. This version was updated in June 2018. We may update this privacy policy at any time.

Important Information

Data Controller

Eden Nuclear and Environment Ltd, registered in England and Wales with company number 06314579 and whose registered office is at Unit 1 Mereside, Greenbank Road, Eden Business Park, Penrith, Cumbria CA11 9FB, is the data controller and responsible for your personal data (hereafter referred to as “we”, “us” or “our” in this privacy policy).

Informing us of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes.

Our Website and third-party links

Our website may contain links to third-party websites beyond our control. Clicking on those links may allow third parties to collect or share data about you. They may use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracing your interaction with the embedded content if you have an account and are logged in to that website. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, you should read the privacy policy of every website you visit.

The Data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include anonymous data, that is data where the identity has been removed. We may collect, use, store and transfer different kinds of personal data about you which we have identified as follows:

- Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- Contact Data includes home address, email address and telephone numbers.
- Financial Data includes bank account details.

- Transaction Data includes information about the particular transaction or contract you commission us to perform and/or other services we provide to you; information about products or services you provide to us and details about payments to and from you.
- IT Technical Data includes information about how you use our website and includes IP address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- Sensitive Personal Data, includes details about your race or ethnic origin; political opinions; religious beliefs; trade union membership; genetics; biometrics, where used for ID purposes; information about your health; sex life or sexual orientation. We do not collect such data unless it is required for the purposes of recruitment or employment. Where we need to process such information we will only do so where we have obtained your prior consent to do so, or where we are legally required to do so.

Providing personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to make you an employment offer or deliver a piece of work).

How Your Personal Data is Collected

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone or email. This includes personal data you provide when you:

- Request us to supply our services.
- Provide goods or services to us.
- Provide us with feedback.
- Seek or take up employment with us.

Automated technologies or interactions. As you interact with our website, we may automatically collect IT Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies or other similar technologies. Cookies are small files stored on your computer or mobile phone to help us understand how people use our website and to help us make our website easy to use.

Our website only uses cookies for statistical and analytical purposes to provide us with anonymous details about your visit to our site. This is statistical data and includes a track of the pages viewed; the time and date of visit; location data or the referrer. They do not compromise your privacy or security and cannot be used to personally identify you.

If you wish, you can reject or disable cookies by adjusting your browser settings, however, this may adversely affect your experience of using our website. If you are not sure how to do this please consult the Help Files on your browser.

Third parties or publicly available sources. We may receive personal or sensitive personal data about you from various third parties and public sources including:

- Identity and Contact Data from employment references; recruitment agencies.

- Occupational health professionals.
- IT technical Data from analytics providers such as Google.
- Identity and Contact Data from search information providers for example Google.
- Identity and Contact Data from publicly available sources such as Companies House.

How your Personal Data is used

Lawful bases

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests in conducting and managing our business. We do not use your personal data for activities where our interests are overridden by the impact on you, unless we have your consent or are otherwise required to do so.
- Where we need to comply with a legal or regulatory obligation.
- We do not usually rely on consent as a legal basis for processing your personal data, but occasionally we may do so.

Purposes for which we may use your personal data

- To provide our services to you.
- To make suggestions and recommendations about services that may be of interest to you.
- To correspond with you.
- To obtain products or services from you or your organisation.
- To place orders.
- To manage payments.
- To manage our relationship with you.
- To make an offer of employment.
- To notify changes to our terms and conditions.
- To ask you to provide feedback.
- To use data analytics to improve our website.

Sharing your personal data

We may have to share your personal data with the parties set out below.

- Service providers acting as processors based in the United Kingdom who provide system administration and/or IT services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance, financial and accounting services.
- HM Revenue & Customs, regulators and other authorities.
- Occupational Health Professionals with reference to people we employ or to whom we may offer employment.
- We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes, and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Transferring your personal data outside the EU

Generally, we do not transfer your personal data outside the European Union. However, should we need to do so, we will ensure that a similar degree of protection is afforded to your personal data.

Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and the applicable regulator of a breach where we are legally required to do so.

Data Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. In accordance with our Data Retention Policy, we consider the amount, nature, and sensitivity of the personal data; the potential risk of harm from unauthorised use or disclosure of your personal data; the purposes for which we process your personal data and whether we can achieve those purposes through other means; and the applicable legal requirements to determine the appropriate retention period for personal data.

Your Legal Rights

Under the Regulations you have a number of rights relating to the personal information we hold about you. You have the right to:

- **Access your personal data**

You have a right to know what personal information we hold about you and how we process it. This is called a subject access request.

- **Request correction of your personal data**

This enables you to have any incomplete or inaccurate data we hold about you corrected.

- **Request your personal data to be erased**

This is also known as the 'right to be forgotten'. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. The right is not absolute and only applies in certain circumstances.

- **Restrict processing of your personal data**

This is not an absolute right and only applies in certain circumstances. You can ask us to suspend the processing of your personal data in the following circumstances:

- (a) if you want us to establish the data's accuracy;
- (b) where our use of the data is unlawful, but you do not want us to erase it;
- (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
- (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- **Data portability**

You have the right to request the transfer of your personal data to you or to a third party to enable you to reuse your personal data for your own purposes. We will provide your data in a safe and secure way which can easily be transferred from one IT environment to another, without affecting its usability. The right only applies to information you have provided to the data controller.

- **Object**

You have the right to object to the processing of your personal data in certain circumstances. You have an absolute right to stop your data being used for direct marketing. In other cases where the right to object applies we may be able to continue processing if we can show that we have a compelling reason for doing so.

- **Withdraw consent at any time**

Where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

Access to and Control of Your Personal Information

A copy of the information we hold relating to you will be provided free of charge; the Company may charge a reasonable fee, based on the administrative cost of providing information, if a request is excessive, unfounded or repetitive. We may charge a reasonable fee to comply with requests for further copies of the same information. We will ask you to provide identification to ensure we do not disclose your information to the wrong person.

Response Time

Information will be provided as quickly as possible and we will try to respond, at the latest, within one month of receipt of the request.

Right to Complain

You have a right to complain to the Information Commissioner if you think there is a problem with the way we handle your data. The Information Commissioner can be contacted by calling the helpline on 0303 123 1113 or through the website, www.ico.org.uk

How to Contact us

If you wish to exercise any of your legal rights, or if you have any queries or complaints in relation to how we use your personal data or this privacy policy, you can contact Shelly Mobbs by telephoning 01768 868985, by email to sfm@eden-ne.co.uk or by letter addressed to Unit 1 Mereside, Greenbank Road, Eden Business Park, Penrith, CA11 9FB.

Signed  _____

Andrew Baker, Managing Director