

Capito Data Privacy Policy

Data Protection Policy and Privacy Notice for Clients and Business Purposes

1. Introduction

Capito is committed to preserving the privacy of our customers, contacts and website visitors; to meeting our data protection obligations; and to being transparent about how we collect and use your personal data. This policy applies to the personal data of clients or other personal data processed for business purposes and how we protect this information and any information you provide to us.

Capito has appointed **Arlene Burnside, Finance and Operations Director**, as the person responsible for data protection compliance. Questions about this policy, or requests for further information, should be directed to Arlene who can be contacted at arlene.burnside@capito.co.uk.

2. Data we collect from you

Capito will collect data from our customers and contacts when:

- you request services from us or subscribe to downloadable content from our website or via social media channels or otherwise provide us with your personal details, such as your name, email address, landline or mobile phone number or other contact details;
- you subscribe to our mailing list; and/or
- we receive data that you have consented to share via another organisation or data list provider.

3. Subscribing to our mailing list

When you subscribe to our mailing list, you have consented to receive information from us, including news and updates from Capito and concerning our vendor partners, information about events and seminars, product updates concerning Capito and/or our vendor partners, and occasional special offers.

We may contact you by email, post or telephone. If you wish to change the way in which we contact you or decide that you no longer wish to receive information from us, you can let us know by updating your preferences or unsubscribing at any time.

4. How we use your data

We will use your data:

- to provide you with products and services and information you have requested or subscribed to receive;
- when we need to contact you to deliver the services we are contracted to provide to you; and/or
- where there is a lawful basis for us to do so.

5. Definitions

"Personal data" is any information that relates to an individual who can be identified from that information. Processing is any use that is made of data, including collecting, storing, amending, disclosing or destroying it.

"Special categories of personal data" means information about an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation and biometric data.

"Criminal records data" means information about an individual's criminal convictions and offences, and information relating to criminal allegations and proceedings.

Data protection principles

Capito processes business-related personal data in accordance with the following data protection principles:

- Capito processes personal data lawfully, fairly and in a transparent manner.
- Capito collects personal data only for specified, explicit and legitimate purposes.
- Capito processes personal data only where it is adequate, relevant and limited to what is necessary for the purposes of processing.
- Capito keeps accurate personal data and takes all reasonable steps to ensure that inaccurate personal data is rectified or deleted without delay.
- Capito keeps personal data only for the period necessary for processing.
- Capito adopts appropriate measures to make sure that personal data is secure, and protected against unauthorised or unlawful processing, and accidental loss, destruction or damage.

Capito tells individuals the reasons for processing their personal data, how it uses such data and the legal basis for processing in its privacy notices. It will not process personal data of individuals for other reasons.

Capito will update business-related personal data promptly if an individual advises that his/her information has changed or is inaccurate.

Personal data gathered during the business contract with a client is held in Capito's business systems including our customer relationship management (CRM) system (in hard copy or electronic format, or both).

Capito keeps a record of its processing activities in respect of business-related personal data in accordance with the requirements of the General Data Protection Regulation (GDPR).

Individual rights

As a data subject, individuals have a number of rights in relation to their personal data.

Subject access requests

Individuals have the right to make a subject access request.

Capito will provide the individual with a copy of their personal data undergoing processing. This will normally be in electronic form if the individual has made a request electronically, unless he/she agrees otherwise.

To make a subject access request, the individual should send the request to arlene.burnside@capito.co.uk. Capito may need to ask for proof of identification before the request can be processed. Capito will inform the individual if it needs to verify his/her identity and the documents it requires.

Other rights

Individuals have a number of other rights in relation to their personal data. They can require Capito to:

- Rectify inaccurate data;
- Stop processing or erase data that is no longer necessary for the purposes of processing;
- Stop processing or erase data if the individual's interests override the organisation's legitimate grounds for processing data (where the organisation relies on its legitimate interests as a reason for processing data);

- Stop processing or erase data if processing is unlawful; and
- Stop processing data for a period if data is inaccurate or if there is a dispute about whether-or-not the individual's interests overrides Capito's legitimate grounds for processing data.

To ask Capito to take any of these steps, the individual should email the request to arlene.burnside@capito.co.uk.

Data security

Capito takes the security of Client and Business-related personal data seriously. The organisation has internal policies and controls in place to protect personal data against loss, accidental destruction, misuse or disclosure, and to ensure that data is not accessed, except by employees in the proper performance of their duties.

Where Capito engages third parties to process personal data on its behalf, such parties do so on-the-basis-of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

Data breaches

If Capito discovers that there has been a breach of personal data that poses a risk to the rights and freedoms of individuals, it will report it to the Information Commissioner within 72 hours of discovery. The organisation will record all data breaches regardless of their effect.

If the breach is likely to result in a high risk to the rights and freedoms of individuals, it will tell affected individuals that there has been a breach and provide them with information about its likely consequences and the mitigation measures it has taken.

International data transfers

Capito will not transfer personal data to countries outside the EEA unless there is a lawful business reason to do so, for example where your contact information or other necessary details are required by a vendor we have partnered with to deliver or resolve technical issues or to enable Capito to deliver services to you.

6. Who has access to data?

Your information may be shared internally with members of Capito's IT, Finance and Sales & Marketing team if access to the data is necessary for performance of their roles.

Capito may share your data with third parties in the context of a sale of some or all of its business. In those circumstances the data will be subject to confidentiality arrangements.

Capito may also share your data with third parties that process data on its behalf, in connection with the provision of our services to your organisation.

Where Capito runs a joint campaign or seminar or co-sponsors an event with one of our vendor partners and you request more information or decide to attend this joint event, we may share some of your data (including your name, your organisation's name, your job title, your business email address and telephone number) with this partner.

7. For how long does the organisation keep data?

The organisation will hold your personal data indefinitely unless the data becomes out of date or until you ask us to modify or delete this data.

If you believe that the organisation has not complied with your data protection rights, you can complain to the Information Commissioner (<https://ico.org.uk>).