



CTG Privacy Policy

1. Introduction

One of CTG's core functions is to take responsibility for the Duty of Care of all staff (which includes employees, consultants, local and international staff). This means being extremely well-informed of any risks, communicating risks, mitigating risks as far as possible and, finally, responding swiftly and appropriately in the event of any incidents. We consider that the work CTG carries out for the humanitarian community is highly important, but nothing comes before the safety of our staff. This includes protecting our staff's virtual identity and their personal data.

2. Processing of Personal Data

CTG may process personal data belonging to anyone who has expressed an interest in or made contact with CTG, or one of its companies; these may include (but are not restricted to) the following interested parties (often referred to as 'you') – employees, contractors, consultants, directors, beneficiary owners, recruitment candidates, clients, and suppliers. The data which CTG (or its related companies) process depends upon the nature of the relationship with the interested party concerned but is likely to include (but is not restricted to) the following:

- Personal and Contact Details: Title, Name, Address, Telephone and Electronic contact details (examples are Email address, Skype, Facebook, Whatsapp, Twitter, Linked-in);
- Date of Birth and Gender;
- Passport details plus Nationality and citizenship;
- Relationship or marital status;
- Next of Kin (NOK) details;
- Financial information (such as bank, tax and insurance details);
- Medical data including psychometric test results;
- Criminal record checks (for example, CRB);
- CV with employment, experience, education and qualifications records – with appropriate verifications, including details of references and referees plus information provided by them;
- Marketing engagements and surveys;
- Records of communications with interested parties;
- Information provided by you through our website, Facebook or LinkedIn accounts and CTG's recruitment and HR management portals.

3. Why is Data Processed?

The overarching purpose for processing personal data is to facilitate, manage and, whenever possible, enhance the services provided by CTG to our interested parties. More specifically the reasons vary, again dependent upon the nature of your relationship with us, but include (not restricted to) the following:

- To enable us to fulfil contractual requirements;
- To ensure that recruitment process is efficient and provides appropriately qualified staff in terms of aptitude and attitude;

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- To ensure that you are properly insured, paid correctly, and that your NOK can be informed in the event of an incident.;
- To meet requirements of public interest and management standards;
- Compliance with legal and regulatory obligations;
- To manage marketing information effectively;
- To facilitate swift responses to the above.

4. What is the legal basis for CTG processing personal data?

Under data protection laws applicable to CTG, there are several lawful reasons for processing data and those that apply to CTG are:

- Consent: because you have given your consent (if we expressly ask for consent to process your personal data, for a specific purpose).
- Contractual: the processing of your personal data is necessary for the performance of a contract with you or to take steps at your request to enter into a contract.
- Legal Obligation: the processing of your personal data is necessary for us to comply with our legal and regulatory obligations.
- To protect your vital interests.
- To meet or protect public interests.
- Employment obligations: where applicable or in case of any processing of sensitive data, the processing is necessary for the purposes of carrying out our obligations prescribed by law in the area of employment.
- Legitimate interest: The processing is necessary for our legitimate interests. Using your personal information helps us to provide our services and to improve and minimise any disruption to the services we provide. We also have a legitimate interest in sending you information on the services we believe will be of interest to you.

The data, which CTG and its component companies process is deemed to be the minimum necessary and is justified by one or more of the aforementioned legal criteria.

5. How does CTG source data?

There are three main ways in which CTG sources personal data. All are legal, transparent and fair:

- Information You Give Us. Information which you give us when completing registration forms and the recruitment process, requested through our due diligence procedure or during our ongoing contact with you.
- Information We Collect. CTG collects information about you from our website, social media accounts, email and telephone contacts plus our due diligence procedures.
- Third Parties. We may collect information from third parties – in particular, we may use third party organisations to conduct background checks and verifications. Additionally, we may use the web and social media sources, all of which are publicly available and strictly open source.

6. Storage of Personal Data

The vast majority of personal data that is processed by CTG is stored electronically, predominantly in cloud-based systems, which are protected through encryption (both when static and in transit). Access is carefully managed

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and restricted appropriately. Any data that is held on servers or on hard drives is subject to restricted access and most of it is encrypted. Any hard copies of processed data are held in secure cabinets with restricted access. It must be noted that information received over the internet or from personal emails may not always be secure; CTG is not liable for corrupted information received from such sources.

All personal data shall be stored, for the minimum time necessary, which will vary but can be defined as follows:

- For as long as we have reasonable business needs, such as managing our relationship with you and managing our operations.
- For as long as we provide goods and/or services to you and then for as long as someone could bring a claim against us.
- Retention periods in line with legal and regulatory requirements and guidance.

7. Use and disclosure of your personal information

In certain circumstances, we shall share your personal data with:

- Other Entities with Chelsea Group.
- Selected third parties with whom we work – for example, clients or potential clients, insurers, solicitors, travel agents, sub-contractors, accountants, government departments and agencies, and external IT and data providers and centres.
- Where a Chelsea Group entity or third party is based outside the country in which you are residing, we would only transfer data outside that country where appropriate safeguards were in place or restrict the information being given. Such safeguards may include: entering into written contracts with the entity or third party that is based in a country that does not provide an adequate level of data protection.
- Any Chelsea Group entity or third party that you consent to giving your information to for marketing purposes (such consent will be sought prior to our sharing this data).
- Legal Requirement. Any other third parties where necessary to enable us to enforce our legal rights, or to protect the rights, property or safety of our employees or where such disclosure may be permitted or required by law.

8. Cookies Use

A “cookie” is a bite-sized piece of data that is stored on your computer’s hard drive. They are used by nearly all websites and do not harm your system. How to reject cookies: If you do not want to receive cookies that are not strictly necessary to perform basic features of our site, you may choose to opt-out by changing your browser settings. Most web browsers will accept cookies but, if you would rather we did not collect data in this way, you can choose to accept all or some or reject cookies in your browser’s privacy settings. However, rejecting all cookies means that you may not be able to take full advantage of all our website’s features. Each browser is different, so check the “Help” menu of your browser to learn how to change your cookie preferences. For more information, generally on cookies, including how to disable them, please refer to www.aboutcookies.org. You will also find details on how to delete cookies from your computer.

9. Your Rights

Interested parties may have the following rights under applicable data protection laws and CTG fully respects them:

- To be informed about the processing of your personal data.
- To have your personal data corrected if it is inaccurate and to have incomplete information completed.

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- To object to processing of your personal data.
- To restrict processing of your personal data.
- To have your personal data erased (right to be forgotten).
- To request access to your personal data and to obtain information about how we process it.
- The right to move, copy or transfer your personal data (data portability).
- In relation to automated decision making, which has a legal effect or otherwise significantly affect you.
- To complain to the relevant data regulator in the country in which you reside.

Please note that there may be occasions where you object to, or ask us to restrict, or stop, processing of your personal data, or erase it, but we shall be unable to comply with such requests for legal reasons. To exercise any of these rights, or if you have any other questions about our use of your information, please email helpdesk@ctg.org and cc GDPR@chelseagroupworldwide.com.

10. Changes to the Policy

CTG reserves the right to amend this privacy policy. You are advised to visit this website section periodically in order to keep up to date with the changes in CTG's privacy policy.

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