

DRD – WEBSITE PRIVACY NOTICE

Introduction

Welcome to DRD's privacy notice for:

- Users of our website
- Staff of business customers
- Staff of potential business customers
- Staff of suppliers
- Staff of potential suppliers
- Job applicants

DRD respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you work with us, contact us or when you have agreed that we can stay in touch with you or when you visit our website (regardless of where you visit it from) and tells you about your privacy rights and how the law protects you.

1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how DRD collects and processes your personal data through your use of this website, including any data you may provide through this website when you fill in any forms on our website and through you providing us with your personal data in other ways such as sending us emails or using our services.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

DRD COMMUNICATIONS LIMITED is the controller and responsible for your personal data (collectively referred to as ("**DRD**"), "we", "us" or "our" in this privacy notice).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, please contact the data privacy manager using the details set out below.

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our data privacy manager in the following ways:

Full name of legal entity: DRD COMMUNICATIONS LIMITED

Name or title of privacy manager: DAVID DADDS

Email address: d.dadds@drd.co.uk

Postal address: NO 1 CROYDON, 12-16 ADDISCOMBE ROAD, CROYDON CR0 0XT UNITED KINGDOM.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 31 May 2018.

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

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. 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 data where the identity has been removed (anonymous data).

We may collect, use, store and transfer the following different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name and last name.
- **Contact Data** includes email address and telephone numbers.
- **Other Data** includes telephone call recordings.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate data to calculate the percentage of users accessing a specific website feature. We do not combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you (please also refer to section 3 below).

3. **Google Analytics**

This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies (see above), to help us analyse how users use our site. The information generated by the cookie about your use of the website will be transmitted to and stored by Google on servers in the United States. We have activated IP-anonymisation, which will anonymise your IP address by cutting it short. In most cases this procedure will be carried out within the area of the European Union and other parties to the European Economic Area Agreement. In exceptional cases the whole IP address will be first transferred to a Google server in the USA and then shortened there. Google will use the information on behalf of DRD for the purpose of evaluating your use of the website, compiling reports on website activity for us and providing us with other services relating to website activity and internet usage. The IP address that your browser conveys within the scope of Google Analytics, will not be associated with any other data held by Google. You may refuse the use of these cookies via the settings in your browser as explained above. You can also opt out of being tracked by Google Analytics in the future by downloading and installing Google Analytics Opt-out Browser Add-on for your current web browser: <http://tools.google.com/dlpage/gaoptout?hl=en>

4. **How is your personal data collected?**

Direct interactions. You may give us your Identity and Contact Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you enquire about our services, our needs or if you are looking to see if there are any staff vacancies.

Indirect interactions. One of the services that we provide to our customers is the ability for customers' staff to record their telephone conversations on our cloud-based platform. If you are a member of staff of a customer of ours then you may give us your Other Data by making recordings of your telephone conversations.

5. **How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data simply to reply to an enquiry you have sent us, to work with you or, in the case of saved telephone calls made by our customers' staff members, storing those calls on our platform to enable those staff members to use the full functionality of the services that we supply.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us

We may use your personal data (name, email and telephone number) to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or if you provided us with your details when you have registered with us for updates and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data (name, email and telephone number) with any business outside DRD for marketing purposes although we do not and have no intention of sharing your personal data in this way.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. Disclosure of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in paragraph 5 above.

Internal Third Parties as set out in the Glossary below.

External Third Parties as set out in the Glossary below.

Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

All third parties are required 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.

7. Cookies

Cookies are small text files that are placed on your computer by websites you visit. Cookies help make this website work and provide information to us about how users interact with our site. We use this information to improve our website.

The cookies we use help to provide us with anonymised, aggregated technical information. This is principally so that we can make sure that the website is easy to navigate, identify the areas that are of particular interest to visitors and generally improve the site and our services. The information that we collect in this process will not identify you as an individual. We do not seek to identify individual visitors unless they volunteer their contact details through one of the forms on the site. In some circumstances our records will identify organisations visiting our site and we may use that information in managing our relationship with those organisations, for example, in considering how to develop the services that we offer them.

By using our website you agree that we can place these types of cookies on your device.

When you accessed this website our cookies were sent to your web browser and stored on your computer. If you wish to remove them, you can manage this via the settings on your browser, but note that this may impact your ability to utilise this and other web sites. The way to clear cookies varies from

one browser to another. You should look in the "help" menu of your web browser for full instructions. For your reference, please click the following links for details on how to manage cookies in each of the major web browsers:

For general information about cookies please visit www.allaboutcookies.org.

8. International transfers

We do not transfer your personal data outside the European Economic Area (**EEA**) other than as set out below.

Like most businesses we use software to support our operations. For example, we use Microsoft as our email provider. Your personal data may therefore be transferred out of the EEA as Microsoft and other major players in the software industry store some of their data in the U.S.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

What is the U.S. Privacy Shield List?

The EU-U.S. and Swiss-U.S. Privacy Shield Frameworks were designed by the U.S. Department of Commerce, and the European Commission and Swiss Administration, respectively, to provide companies on both sides of the Atlantic with a mechanism to comply with data protection requirements when transferring personal data from the European Union and Switzerland to the United States in support of transatlantic commerce. On July 12, 2016, the European Commission deemed the EU-U.S. Privacy Shield Framework adequate to enable data transfers under EU law. On January 12, 2017, the Swiss Government announced the approval of the Swiss-U.S. Privacy Shield Framework as a valid legal mechanism to comply with Swiss requirements when transferring personal data from Switzerland to the United States.

The Privacy Shield program, which is administered by the International Trade Administration (ITA) within the U.S. Department of Commerce, enables U.S.-based organisations to join one or both of the Privacy Shield Frameworks in order to benefit from the adequacy determinations. To join either Privacy Shield Framework, a U.S.-based organisation will be required to self-certify to the Department of Commerce and publicly commit to comply with the Framework's requirements.

DRD India

If you are a member of staff of one of our customers then your Identity Data, Contact Data and Other Data will be stored on our platform based in the UK. Our platform is developed and maintained by the local staff of our wholly owned subsidiary based in India - DRD Communications & Software Pvt. Ltd (**DRD India**). DRD India's staff are able to access personal data on our platform when they perform development, maintenance and helpdesk support. As DRD India's staff, based in India, can access personal data stored on our platform in the UK, this falls under the definition of a "data transfer" outside the EEA for UK data protection law purposes. To comply with data protection laws and so that your

personal data is adequately safeguarded, we have put in place arrangements with our Indian subsidiary and our customers that contain EU model controller–to–processor clauses for the transfer of personal data outside the EEA.

Please contact us if you would like further information on the specific mechanisms used by us when transferring your personal data out of the EEA.

9. 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 any applicable regulator of a breach where we are legally required to do so.

10. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, 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, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: see “Request erasure” below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

11. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. The rights listed below are set out in more detail at the end of this policy.

- *Request access to your personal data.*
- *Request correction of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*
- *Request restriction of processing your personal data.*

- *Request transfer of your personal data.*
- *Right to withdraw consent.*

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

12. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. 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 or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

Internal Third Parties

Our subsidiary that is based in India and which provides IT and system administration services.

External Third Parties

- Service providers based in the U.S. and the UK who provide IT and system administration services.
- Professional advisers who provide, for example, consultancy and legal services who are based in the UK.

- Regulators and other authorities based in the UK who may require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (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.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

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. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Please note: for our customers' staff - depending on your request – we may need to direct your request to your employer.