



C&C Group Privacy Statement (Public)

Security and Confidentiality

This document remains the property of C&C Group at all times and must not be circulated to third parties without the express permission of C&C Group.

Indemnity

C&C Group do not accept any responsibility for any consequences as a result of any errors or omissions in this document, and confirm that nothing in the document constitutes a contractual or commercial statement unless this document is specifically referred to in a contract.

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1. C&C Group – Privacy Statement Overview

C&C Group Holdings Limited is registered with the Information Commissioners Office (ICO), the supervisory authority of UK data protection law, under registration ID Z8883873. C&C Group is committed to respecting your privacy and recognise our responsibilities either as a Data Controller or Processor to keep any personal information that you provide secure at all times. It is the policy of C&C Group to comply with all applicable data protection and privacy laws in the course of our day-to-day business operations.

We ask that you read this Privacy Statement carefully as it contains important information about how we will use your personal information in compliance with the Data Protection Act 2018 and the rights of the data subject under the General Data Protection Regulation (“UK GDPR”).

C&C Group is an I.T. services organisation. The information we collect and process falls into two broad categories:

1. Information received, stored, and processed during our standard internal business operations
2. Information received, stored, and processed on behalf of our customers whilst discharging our responsibilities under a contract / agreement

This privacy Statement only concerns itself with category 1. Information falling into category 2 will generally be managed via contractual privacy statements, as part of a contract or data processing agreement.

2. Personal Information Collection and Use

C&C Group may receive, store, and process your personal data for several reasons. The processing completed will depend on the route we have received the data, and the context in which the data is presented. Examples are as follows:

- Information sent to C&C Group (by yourself or a 3rd party) in the context of a job application
- Information sent to C&C Group (by yourself or a 3rd party) in the context of a commercial approach
- Information sent to C&C Group via the Contact Us form of C&C Group’s corporate website
- Information sent to C&C Group contained in an email / any other electrical correspondence
- Information provided to C&C Group as part of a conference call, a telephone call, or other such webinar

By contacting C&C Group in any way, you are providing consent for us to retain, store, and process that information in line with our own Legitimate Interests, and in line with the UK’s data protection legislation.

The type of personal information we may collect could include:

- Name
- Address (personal or business, whichever was provided)
- Other contact details (personal or business, whichever was provided)
- Date of birth
- Nationality
- Job history
- Telephone number(s) (personal or business, whichever was provided)
- Email address(es) (personal or business, whichever was provided)

C&C Group will process your data:

- To fulfil a request you have made
- To respond to subject access requests
- To discharge our responsibility pertaining the fulfilment of a contract

- For the purposes of marketing new products and services to you and your organisation (if applicable)
- To respond to requests made by the UK supervisory authority
- To respond to valid requests made by the UK law enforcement agencies

3. Retention of your Personal Information

Your data shall be retained for the minimum period necessary for processing as directed by the Principle of Storage Limitation and Article 5(1)(e) of the (UK) GDPR. The retention of your information is dependent upon the context it was received and how it is to be processed. The C&C Group Information Security Management Team holds an Information Asset Data Register that records the data retention schedules for different information types. It is audited internally by its Chief Information Security Officer led Information Security Management Team and external UKAS accredited independent auditors for compliance with its ISO27001:2022 and the (UK) GDPR. Your personal data retention schedule is available to you upon request using the C&C Group Data Request Form located on the Company's Privacy Page.

4. Transfer of your Personal Data

Your information, including Personal Data, is processed at C&C Group's operating offices, data centres, and in any other places where the parties involved in the processing are located. This means that this information may be transferred to, and processed on, computers located outside of your country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction. Your consent to this Privacy Statement followed by your submission of such information represents your agreement to that transfer.

C&C Group will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Statement and no transfer of Your Personal Data will take place to an organisation or a country unless there are adequate controls in place including the security of Your data and other personal information.

5. Disclosure of your Personal Information

Your information may be disclosed to any or all of the following:

- C&C Group employees; and
- Auditors or contractors or other advisors auditing any of our business processes ("Third Parties").

We require all third parties to respect the security of your personal data in accordance with legal requirements under the UK GDPR. Additionally, we do not allow third parties to use your data for purposes other than those we have specified.

In the event of any unauthorised disclosure, C&C Group will consider the potential likelihood and severity upon your rights and freedoms as directed by the Information Commissioners Office, following the breach. Once the Company has undertaken an assessment and if a risk exists, it will also notify the ICO as the UK Supervisory Authority.

6. Cookies

We use cookies on the Web Portal to distinguish you from other users of the Web Portal. This helps us to provide you with a good experience when you browse the Web Portal and allows us to improve and monitor use of the Web Portal. Cookies are not used for any other purpose.

7. Location Data

C&C Group does not hold or track your location data for any sales or marketing purposes. This includes the capture and use of IPs from the C&C Group web page which will not be used to intrinsically identify your location, nor be used in any other manner to assist in the identification of your location. The IP data is retained for operational purposes only. Any other application processing that could also be used to generate location data, for example returning Meter Point Registration or Administration Numbers will be the Data Controller's decision and not by C&C Group acting as a Data Processor.

8. Security of your Personal Information

C&C Group will use technical and organisational safeguards required by article 32 to comply with the 'Integrity and Confidentiality' aka Security Principle of the GDPR to protect your personal information from being accidentally lost, used or accessed in an unauthorised manner, altered or disclosed. Whilst we will use all reasonable efforts to safeguard your personal data, you acknowledge that the use of the Internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data or other information that are transferred from you or to you via the Internet.

Your request will be reviewed by the Information Security Management Team and restricted to only those parties necessary to process your request. You will also be notified if the data exceeds any legal or commercial retention period and cannot be processed.

Additionally, we have put into place procedures to deal with any suspected data breach and will notify you of such when we are legally required to do so.

9. Your Rights in Relation to your Personal Information

You can write to us at any time to obtain a copy of your information and to have any inaccuracies corrected. Where appropriate, you may have your personal information erased, rectified, amended, or completed.

Please write to:

Information Security Manager
C&C Group Holdings Limited,
Grosvenor House,
65-71 London Road,
Redhill, Surrey, RH1 1LQ

Please phone: +44 (0) 1737 907766

Please email: privacy@candc-uk.com

Please quote your name and address. We would be grateful if you could also provide brief details of the personal information of which you would like a copy or which you would like to be corrected (this helps us to locate more readily your data) using the aforementioned C&C Group Data Request Form.

We will require proof of your identity before providing you with details of any personal information we may hold about you. We may charge a nominal fee to cover the administration costs involved in providing you with a copy of your personal information if any such request is deemed unfounded, excessive or repetitive as defined by the UK GDPR. Any such fee must also be notified and agreed upon in such circumstances.

10. Privacy Support

We reserve the right to amend or modify this Privacy Statement at any time and in response to changes in applicable data protection and privacy legislation. In the event the Purposes for processing change, then we will notify you as soon as practicable and seek your consent where such notification relates to a new additional purpose for processing.