



## SC GROUP – PRIVACY NOTICE

### Introduction

Welcome to SC Group's privacy notice.

SC Group respects your privacy and is committed to protecting your personal data. This privacy notice will tell you about how we look after your personal data when you deal with us or when you visit our website (regardless of where you visit it from), and tell you about your privacy rights and how the law protects you.

### The Short Version

- The law says we must give you this privacy notice when we hold or use your personal data.
- We have to:
  - Say who we are
  - Tell you what personal data we may collect about you and how we collect it
  - Tell you how we use your personal data and who else it might go to
  - Tell you how we look after your personal data and how long we keep it for
  - Tell you about your legal rights in respect of your personal data and how to exercise those rights
- You can exercise your legal rights, or ask any other questions about how we handle your personal data, by contacting us at [data@scgroup-global.com](mailto:data@scgroup-global.com) or using the other contact details shown below.
- More information about your legal rights and certain key words and phrases can be found in the Glossary.

### Purpose of this privacy notice

Please note that we do not knowingly collect data relating to children.

If you are a child and you think we have your personal data, please email us at [data@scgroup-global.com](mailto:data@scgroup-global.com) or get in touch using the other contact details shown below.

This privacy notice aims to give you information on how SC Group collects and processes your personal data, including any information you may provide when you (for example):

- Visit our website
- Provide us with a business card
- Communicate with us as a potential or actual customer or supplier
- Sign up to our newsletter
- Attend one of our events

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 any of those other notices and is not intended to override them.

## **Who we are**

SC Group is made up of different legal entities, details of which can be found [here](#). This privacy notice is issued on behalf of SC Group, so when we mention "SC Group", "we", "us" or "our" in this privacy notice, we are referring to the relevant company in the SC Group responsible for processing your data. Unless we tell you otherwise, SC Innovation-Global Limited is the controller and responsible for the website on which this privacy notice appears.

We have appointed a Data Privacy Co-Ordinator who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise [your legal rights](#), please contact the Data Privacy Co-Ordinator using the details set out [below](#).

## **Contact details**

Our full details are:

Full name of legal entity: SC Innovation-Global Limited

Name or title of Data Privacy Co-Ordinator: Tom Hattan

Email address: [data@scgroup-global.com](mailto:data@scgroup-global.com)

Postal address: The Airfield, Dunkeswell, Honiton EX14 4LF

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](http://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 of the privacy notice was last updated on 21 May 2018 and historic versions can be obtained by [contacting us](#).

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**

Our 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.

### **1. 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 different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, title (which may indicate marital status and gender) and, in some cases (explained [here](#), [here](#) and [here](#)), nationality, security

clearance, date of birth, passport details (or similar identity documentation) and CCTV images of you.

- **Contact Data** includes billing address and delivery address (either of which may, in certain circumstances, also be your personal address), email address and telephone numbers.
- **Financial Data** includes personal bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from or supplied to us (in your individual / personal capacity) and your attendance or non-attendance at any of our events (which may include dietary preferences).
- **Technical Data** includes internet protocol (IP) address, your login data, 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 this website.
- **Usage Data** includes information about how you use our website, products and services (in your individual / personal capacity).
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

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 your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### **If you fail to provide 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 provide you with goods or services, or to purchase them from you). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## **2. How is your personal data collected?**

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

- **Direct interactions.** You may give us your Financial Data, Identity Data, Contact Data and Transaction Data by filling in forms or by communicating with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for or enquire about our products or services;
  - enquire about providing goods and services to us;
  - subscribe to our service or publications;
  - request marketing to be sent to you;
  - respond to an invitation to one of our events;

- visit our premises;
- give us your business card;
- enter a competition, promotion or survey; or
- give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data and Usage Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our [cookie policy](#) for further details. In addition, when you visit our premises, images of you may be captured by our CCTV.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
  - Technical Data from the following parties:
    - (a) analytics providers, such as Google, based outside the EU; and
    - (b) search information providers based inside or outside the EU.
  - When you visit any of our secure premises, Identity Data from your security controller, the UK Ministry of Defence's International Visits Control Office, or other security authorities.
  - Identity and Contact Data from publicly-available sources, such as Companies House and the Electoral Register, based inside the EU, and social media sites based inside or outside the EU.

### 3. 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 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 (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Click [here](#) or [here](#) to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us at [data@scgroup-global.com](mailto:data@scgroup-global.com) or using the other contact details shown [above](#).

#### Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Purpose/Activity	Type(s) of personal data	Lawful basis for processing, including basis of legitimate interest
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Purpose/Activity	Type(s) of personal data	Lawful basis for processing, including basis of legitimate interest
To liaise with you / your organisation about a potential contract with you as a customer	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> </ul>	Performance of a contract with you
To register you / your organisation as a new customer	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> </ul>	Performance of a contract with you
<p>To process and deliver your order including:</p> <p>(a) Manage payments, fees and charges</p> <p>(b) Collect and recover money owed to us</p>	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Financial Data</li> <li>• Transaction Data</li> <li>• Marketing and Communications Data</li> </ul>	<p>Performance of a contract with you</p> <p>Necessary for our legitimate interests (to recover debts due to us)</p>
<p>To manage our relationship with you which may include:</p> <p>(a) Notifying you about changes to our terms or privacy policy, or other contract terms</p> <p>(b) Asking you to leave a review or take a survey</p>	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Marketing and Communications Data</li> </ul>	<p>Performance of a contract with you</p> <p>Necessary to comply with a legal obligation</p> <p>Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
To enable you to partake in a prize draw, competition or complete a survey	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Usage Data</li> <li>• Marketing and Communications Data</li> </ul>	<p>Performance of a contract with you</p> <p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Technical Data</li> </ul>	<p>Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>Necessary to comply with a legal obligation</p>

Purpose/Activity	Type(s) of personal data	Lawful basis for processing, including basis of legitimate interest
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Usage Data</li> <li>• Marketing and Communications Data</li> <li>• Technical Data</li> </ul>	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	<ul style="list-style-type: none"> <li>• Technical Data</li> <li>• Usage Data</li> </ul>	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods, services or events that may be of interest to you	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Technical Data</li> <li>• Usage Data</li> </ul>	Necessary for our legitimate interests (to develop our products/services and grow our business)
To register you / your organisation as a new or potential supplier or teaming partner	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> </ul>	Performance of a contract with you
To deal with you / your organisation in your / its capacity as a supplier to (or teaming partner of) us	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Transaction Data</li> </ul>	Performance of a contract with you Necessary for our legitimate interests (to help ensure that we have the best possible supply chain)
To manage your visit to one of our sites, in accordance with any applicable security requirements	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> </ul>	Necessary to comply with a legal obligation Necessary for our legitimate interests (to help manage the logistics of your visit and safeguard our commercially sensitive information)
To manage your potential or actual attendance at one of our events	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Transaction Data</li> <li>• Marketing and Communications Data</li> </ul>	Necessary for our legitimate interests (to help manage the logistics of our events and use events to help develop our business)

Purpose/Activity	Type(s) of personal data	Lawful basis for processing, including basis of legitimate interest
To contact you about providing a reference for one of our potential recruits	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> </ul>	Necessary for our legitimate interests (to help ensure the suitability of the people we recruit)

### Promotional offers from us

We may use your Identity Data, Contact Data, Technical Data, Transaction Data and Usage Data 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 products, services, and events may be relevant for you (we call this marketing).

You may receive marketing communications from us if you have requested information from us or purchased goods or services from us 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 with any company outside SC Group for marketing purposes. We do not currently do this kind of sharing.

### Opting out

You can ask us (or third parties) to stop sending you marketing messages at any time by contacting us at [data@scgroup-global.com](mailto:data@scgroup-global.com) or using the other contact details shown [above](#).

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

### 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 want an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at [data@scgroup-global.com](mailto:data@scgroup-global.com) or using the other contact details shown [above](#).

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.

## 4. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the [Glossary](#).
- External Third Parties as set out in the [Glossary](#).
- 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.

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.

## **5. International transfers**

We share your personal data within SC Group. This may, in some cases, involve transferring your data outside the European Economic Area (**EEA**), to our Australian subsidiaries.

We ensure your personal data is protected by requiring all our group companies to follow the same rules when processing your personal data. These rules are called "binding corporate rules".

Please [contact us](#) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## **6. Data security**

As a business with significant activity in the defence sector, we operate to an extremely high standard of 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.

## **7. Data retention – how long will we use your personal data for?**

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.

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 requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us at [data@scgroup-global.com](mailto:data@scgroup-global.com) or using the other contact details shown [above](#).

Where our customers are individuals, by law we have to keep basic information about them (including certain Contact Data, Identity Data, Financial Data and Transaction Data) for six years after they cease being customers.

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.

## **8. Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- [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 at [data@scgroup-global.com](mailto:data@scgroup-global.com) or using the other contact details shown above.

### **No fee usually required**

You will not normally 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.

## **9. Glossary**

### **LAWFUL BASIS**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give our actual and potential customers 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 at [data@scgroup-global.com](mailto:data@scgroup-global.com) or using the other contact details shown above.

**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**

- Other companies in SC Group acting as joint controllers or processors and who are based in the UK and provide IT and system administration services and undertake management reporting.

## External Third Parties

- Service providers acting as processors based in the UK who provide IT and system administration services.
- Professional advisers, including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the UK, who 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 the legitimate interest 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 or otherwise continue our relationship with you. We will advise you if this is the case at the time you withdraw your consent.