

Type:	Group Wide Procedure				
Document:	GDPR Policy				
Document #	GDPR1.0	Revision#	0	Next Scheduled Review	11/25

Statement of Intent – GDPR Compliance

The General Data Protection Regulation is a European-wide law that replaces the Data Protection Act 1998 in the UK. It places greater obligations on how organisations handle personal data. It came into effect on 25 May 2018.

Privacy Policy

This Privacy Policy explains what we do with personal data, whether we are in the process of employing you, providing you with a service or receiving a service from you, using your data to ask for your assistance or you are visiting our website and or social media.

It describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights.

Privacy Policy for Think Access Group Ltd Employees

Think Access Group Ltd is committed to protecting the privacy of our candidates, clients, suppliers and users of our website or bespoke database software. We want to provide a safe and secure user experience. We will ensure that the information you submit to us via our website (or Database, or social media, or e-Mail) is only used for the purposes set out in this policy.

The Information We Collect and How We Use It

Think Access Group Ltd may collect your personal details, including but not limited to your name and contact details and next of kin (together with your e-mail address) and other relevant information from your CV or Training Profile to enable suitable work role assessment and client satisfaction. Often this may also include - sensitive personal information such as details of criminal convictions and ethnic origin. This information is held, used and disclosed by us as follows:

- To provide our services to you
- To maintain our business relationship with our clients
- To answer your enquiries
- To direct-market products and services, advise you of news and industry updates, events, promotions and competitions, reports and other information.
- Where we do so, you will be able to unsubscribe from such communications;
- To fulfil contractual obligations with our clients
- To pass on to trusted third parties where we have retained them to provide services that you or our clients have requested, such as reference, qualification and criminal reference checking services (as required), verification of the details you have provided from third party sources, psychometric evaluations or skills tests.
- These third parties comply with similar and equally stringent undertakings of privacy and confidentiality as Think Access Group Ltd;
- To pass on to third parties who perform functions on our behalf and who also provide services to us, such as professional advisors, Training Companies, IT consultants carrying out testing and development work on our business technology systems, research and mailing houses and function co-ordinators.
- These third parties comply with similar undertakings of privacy and confidentiality as Think Access Group Ltd;

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- If Think Access Group Ltd or its business merges with or is acquired by another business or company, we may share personal information with the new owners of the business or company and their advisors and if this happens, you will be sent notice of such event.
- We may also release personal information to regulatory or law enforcement agencies, if they require us to do so.
- We will also disclose your information where we are permitted and requested to do so by law; and we may also seek your consent to collect, hold, use and disclose your personal information for any other purpose not listed above.

Access

You have the right at any time to ask us for a copy of the information supplied by you that we hold although you are able to view what data we hold through our Database if you are subscribed user. We may ask you to verify your identity and for more information about your request. Where we are legally permitted to do so, we may refuse your request and will give you reasons for doing so.

If you would like to make a request for information, please contact info@thinkaccess.co.uk. You also have the right to ask Think Access Group Ltd to stop using your information. However, if this involves a request for deletion of your file, please be aware that we may not be required or able to do so, particularly where your file also holds information about our clients or financial information that we need to keep for periods of up to six years, i.e. that relate to tax matters or safety. Where we are unable to comply with your request we will provide reasons for failing to do so.

Internet-based storage and transfers

Think Access Group do not hold paper files of personnel. All data is stored in proprietary formats such as Microsoft Word and Excel on secure servers. All electronic data held by Think Access Group Ltd is through GDPR compliant servers based within Europe using secure cloud services. Any information held on personal computers is temporary and overridden by the cloud-based servers and always secured by password protection. All company computers operate virus protection.

Given that the Internet is a global environment, using the Internet to collect and process personal data necessarily involves the transmission of data on an international basis. Therefore, by communicating electronically with us, you acknowledge and agree to our processing of personal data in this way.

Please see our Cyber Security Policy for more details.

Paperless Operations and Secure Handling of Printed Data

Think Access Group Ltd is committed to minimising the use of paper and maintaining a secure, environmentally responsible, and efficient data management environment. As part of our GDPR compliance strategy, we actively strive to operate as a paperless organisation wherever possible.

In circumstances where it is necessary to print confidential information, the following safeguards will be implemented:

- **Controlled Access:** Printed documents containing personal or sensitive data will be accessed only by authorised personnel.
- **Secure Storage:** Such documents will be stored in locked cabinets or restricted-access areas when not in use.

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- Time-Limited Retention: Printed information will be retained only for the duration necessary to fulfil its intended purpose.
- Secure Disposal: Once printed materials are no longer required, they will be immediately and securely destroyed using cross-cut shredders or secure document destruction services.

These measures ensure that the confidentiality, integrity, and availability of personal data are protected at all times—whether in digital or physical format.

Changes to our Privacy Policy

This privacy policy may be changed by Think Access Group Ltd at any time. If we change our privacy policy in the future, we will advise you of changes or updates to our privacy policy by a prominent notice on our website, Social Media or Direct Contact. Continued use of this website or our services after such changes will constitute your acceptance of such changes.

Your Rights - Under the GDPR regulations you also have the right to:

Request Data Subject Access Requests (DSAR) by asking us to confirm what information we hold about you at any time, and request us to modify, update or delete such information. We may ask you to verify your identity and for more information about your request. If we provide you with access to the information we hold about you, we will not charge you for this unless your request is "manifestly unfounded or excessive". If you request further copies of this information from us, we may charge you a reasonable administrative cost where legally permissible. Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons for doing so.

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 or justified commercial 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.

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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.

Contact

If you have any enquires you can contact us at: info@thinkaccess.co.uk or by writing to us.

Signed:



Roger Neal
SHEQ Director
Date: 1st Feb 2025