

Fair Processing Notice: Members of the Public

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Version Number	Date	Notes on changes since last version
1	08/03/24	New document

The Macro group is committed to protecting and respecting your privacy. This notice sets out the basis on which any personal data (this term is explained in the Definitions section below) we collect throughout our relationship with you, will be processed by us. Some of the data we collect is Special Category personal data (this term is explained in the Definitions section below). Please read this privacy notice carefully to understand your rights and our views and practices regarding your personal data.

The Macro group is made up of different legal entities. When we refer to ‘Macro’, ‘we’, ‘us’, or ‘our’, we are referring to the relevant company in the Macro group responsible for processing your personal data. A reference to ‘you’ or ‘your’ is to you as an individual.

For the majority of individuals, the data controller responsible for processing your personal data is Macro Group Limited of 155 Moorgate, London EX2M 6XB. In some circumstances, other Macro group companies will also be a controller in respect of your personal data. If you have any queries about which Macro group company is a controller in respect of your personal data, please contact the Data Protection Compliance Manager(‘DPCM’) at MacroLegal@macegroup.com.

This notice is overseen by the DPCM. If you have any queries, complaints or requests please contact the DPCM at the email address above.

What information do we collect from you?

We will collect and process the following data about you:

- **Information you give us.** This is information about you that you give us directly. You may do this by filling in forms on our website or by corresponding with us by phone, email or otherwise. Information you send to us may be stored and processed by Macro. This will include any emails or other electronic messages and any documents, photos or other files stored on or processed through our systems or devices. Please be aware that by entering information onto these systems you are sharing that information with Macro.
- **Information we collect throughout our relationship.** We will collect information throughout your time with us. This may include information about location, employees, projects, working hours and other relevant information.
- **Information we receive from other sources.** We receive information about you from third parties, including:
 - o Tax and regulatory authorities such as HMRC;
 - o Previous employers;
 - o Recruitment or vetting agencies;
 - o Security clearance/ pre-employment check providers;

- o Publicly available resources including online sources.
- **The type of information we collect.** This may include, but is not limited to the following (and may include Special Category personal data as defined below)
- **Identification information** – name, title, date and place of birth, gender, photograph, marital status, nationality, identification documents such as copies of passport and government identification numbers.
- **Contact details** – address, telephone number, mobile telephone number, email address.
- **Employment related information** – job title, company, business contact information, CV and employment application, eligibility to work, employment history, references, qualifications and other educational history, employment contract information and driving licence information.
- **Browsing behaviour** – When you visit our site we may collect information about your online browsing behaviour and any devices you have used to access our site (including your IP address, browser type and mobile device identifiers).
- **Location** – We may collect your location data through your IP address.
- **Dietary requirements** – In some cases, such as for attendance at catered events, we may collect and process special dietary requirements for reasons of health or religion.
- **Information about your health** – In some cases, we may collect information which is categorised as health data such as in respect of accessibility to buildings and resources, accessibility to documents and other materials or, if you are a job applicant, information about your medical history and vaccination status.
- **Equality and diversity** – You may choose to share information about your ethnicity, parental status, sexuality or beliefs with us for inclusion purposes. This information will be treated as highly confidential.
- **Images and video footage** – images and footage are collected from our use of CCTV and similar technologies at our offices and/ or sites. Footage may also be collected via drones, body worn cameras, headcams and webcams when you visit one of our sites. In some instances, this will include audio footage.
- **Other data** – which we may notify you of from time to time
- **Opinion** – Macro may also contact you to ask you to take part in voluntary surveys to hear your opinion of current services or of potential new services on offer. If you choose to take part in these surveys, we will collect the information you provide. We also collect data you provide in emails and phone calls for example, your questions to customer support.

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. 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.

Why do we collect this information?

We collect use and share your personal data for different purposes. Data protection law requires us to have a legal ground in order to collect, use or share your personal data for a particular purpose. The Legal Grounds that we most commonly rely on include:

1. Where we need to perform the contract we are about to enter into or have entered into with you.
2. Where we need to comply with legal requirements.
3. 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.
4. Where you have given your consent.

We have set out below in the table the purposes that we use your personal data for and the associated legal grounds:

Purpose	Additional types of personal data processed along with identification information and contact details
Legal ground: Based on performance of our contract with you, or in order to take steps at your request to enter into a contract with you, for example:	
In performing our obligations under our contract to which you are a or when applying for a vacancy advertised on our website	<input type="checkbox"/> Employment related information
Apply for or renew your visa if being sponsored by Macro	<input type="checkbox"/> Information about your health <input type="checkbox"/> Images and video footage
Legal ground: To comply with legal requirements relating to:	
The provision of products and services	<input type="checkbox"/> Browsing behaviour <input type="checkbox"/> Location <input type="checkbox"/> Preferences
Complying with mandatory reporting obligations and other requirements (e.g. under tax, health and safety, data protection, investigations, anti-money laundering and anti-discrimination disclosures required by law enforcement agencies)	<input type="checkbox"/> Employment related information <input type="checkbox"/> Information about your health
Legal ground: For our legitimate interests for the purposes of:	
Inform you of our services through email, mail, telephone, or SMS message	<input type="checkbox"/> Browsing behaviour <input type="checkbox"/> Location <input type="checkbox"/> Preferences
Managing our response to a pandemic/epidemic	<input type="checkbox"/> Employment related information <input type="checkbox"/> Information about your health
Informing you about employment related opportunities	<input type="checkbox"/> Employment related information <input type="checkbox"/> Preferences
Hiring and recruitment and the processing of job applications any employment background checks, reference checks and and training checks	<input type="checkbox"/> Employment related information <input type="checkbox"/> Preferences <input type="checkbox"/> Equality and diversity data

Send you information on promotional content (which you have option to opt out of)	<input type="checkbox"/> Browsing behaviour <input type="checkbox"/> Location <input type="checkbox"/> Preferences
Keep our site and systems safe and secure	<input type="checkbox"/> Images and video footage
For our legitimate interest in respect of litigation, including defending legal claims and investigating complaints	<input type="checkbox"/> Employment related information <input type="checkbox"/> Information about your health <input type="checkbox"/> Images and video footage

Purpose	Additional types of personal data processed along with identification information and contact details
Remember you when you visit our website and see how you through it by using cookies or when you use our forms to content or sign up for a newsletter.	<ul style="list-style-type: none"> <input type="checkbox"/> Browsing behaviour <input type="checkbox"/> Location <input type="checkbox"/> Preferences
Supply, improve and support the services we provide, understanding our customer base and purchasing trends and effectiveness of our marketing	<ul style="list-style-type: none"> <input type="checkbox"/> Browsing behaviour <input type="checkbox"/> Location <input type="checkbox"/> Preferences
Ensure that our recruitment practices are fair and inclusive and are recruiting a diverse workforce	<ul style="list-style-type: none"> <input type="checkbox"/> Employment related information <input type="checkbox"/> Equality and diversity data
<p>Legal ground: We may also process data on the basis of your consent which you will be notified of from</p>	

We may inform you of additional purposes for processing your information when that information is collected from you.

How we use special category personal data

Special category personal data (this term is explained in the Definitions section below) attracts a higher level of protection. Data protection law requires us to have an additional **condition** where we are collecting, storing and using special category personal data.

The conditions that we most commonly rely on to collect, use or share your special category personal data include:

- In limited circumstances, your explicit consent.
- Where we need to carry out our legal obligations or exercise rights in the field of employment.
- Where it is needed in the public interest, such as for equal opportunities monitoring.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your vital interests (or someone else's vital interests) and you are not capable of giving your consent, or where you have already made the information public.

Purposes for which we use your special category personal data

In general, we will not process special category personal data about you unless it is necessary for performing or exercising obligations or rights in connection with your relationship with us. There may also be other reasons for processing, such as where it is in the public interest to do so. We have indicated below the purpose or purposes for which we are processing or may process your special category personal data.

- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting

Criminal offence data

We will only collect criminal offence data if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process. We will use information about criminal convictions and offences for background and screening checks.

We are allowed to use your personal data in this way to exercise our rights and carry out our obligations in the field of employment or to establish, exercise or defend legal claims.

We may inform you of additional purposes for processing your information when that information is collected from you.

How can you choose and control what information we send you?

There are two ways in which you can notify us of your preferences:

1. Fill out the form on our website. You can also use this form to update us of any changes to the information we may hold relating to you. E.g. change of email address.
2. Click the unsubscribe link on any marketing emails we have sent you.

How long do we keep hold of your information?

We only store your information for as long as is required for the purpose it was collected. Should you wish to have more information about how long we retain your data, please contact our DPCM at: MacroLegal@macegroup.com.

Information stored generally on IT systems, such as email history, will be deleted regularly in line with our policies.

Automated decision making

Automated decision-making takes place when an electronic system uses personal information to, make a decision, without human intervention. We are allowed to use automated decision-making in the following circumstances:

1. Where we have notified you of the decision and given you 21 days to request a reconsideration.
2. Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.
3. In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

Who might we share your information with?

Where information is shared with third parties we will only share the information required for the purpose it is being shared. For the purposes set out in the 'Why do we collect this information?' section above, we have the right to share your personal information with:

- Our clients and prospective clients.
- Our suppliers and sub-contractors and the suppliers and sub- contractors of our clients where required.
- Sub-processors and service providers including our pre- employment screening check provider or other providers details of which can be provided upon request.
- Other companies in the Macro Group.

Additionally, we will disclose your personal information to the relevant third party:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- To third parties when it is necessary for the establishment, exercise or defence of legal claims.
- If we are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we choose to exercise a legal power to do so.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply contractual terms or other agreements; or to protect the rights, property, or safety of ourselves our customers, our regulator, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and prevention of money laundering and credit risk reduction.

How your data is stored and kept secure?

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from the DPCM.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

International transfers

Due to the way that the Macro group operates, companies within the Macro group may be subject to the UK GDPR and/or the EU GDPR.

Where the UK GDPR applies

We share your personal data within the Macro group. This may involve transferring your personal data outside the UK. We share personal data within the Macro group on the basis of model contractual clauses which have been approved by the UK Government.

We may also transfer your personal data outside the UK to other third parties. We will only do so if adequate protection measures are in place in compliance with the applicable data protection laws. We use the following protection measures:

- transferring to countries that have been deemed to provide an adequate level of protection;
- using approved model contractual clauses; or
- transferring when one or more of the conditions set out in Article 49 UK GDPR are met.

Where the EU GDPR applies

We share your personal data within the Macro group. This may involve transferring your personal data outside the European Economic Area (“EEA”). We share personal data within the Macro group on the basis of model contractual clauses which have been approved by the European Commission.

We may also transfer your personal data outside the EEA to other third parties. We will only do so if adequate protection measures are in place in compliance with the applicable data protection laws. We use the following protection measures:

- transferring to countries that have been deemed to provide an adequate level of protection;
- using approved model contractual clauses; or
- transferring when one or more of the conditions set out in Article 49 EU GDPR are met.

What are your rights?

You have the following rights. You can exercise these rights at any time by contacting the DPCM. You can make a subject access request verbally or in writing. In order to deal with your request effectively, it would be helpful if you could contact the DPCM in the first instance. The DPCM may be contacted in the following ways:

By post: DPCM, Macro Group, 155 Moorgate, London EC2M 6XB

By email: MacroLegal@macegroup.com

You have the right:

- to ask us not to process your personal data for marketing purposes;
- to ask us not to process your personal data where it is processed on the basis of legitimate interests provided that there are no compelling reasons for that processing;
- where processing of your personal data is based on consent, to withdraw that consent at any time.
- to request from us access to personal information held about you;
- to ask for the information we hold about you to be rectified if it is inaccurate or incomplete;
- to ask for data to be erased provided that the personal data is no longer necessary for the purposes for which it was collected, you withdraw consent (if the legal basis for processing is consent), you exercise your right to object, set out below, and there are no overriding legitimate ground for processing, the
- data is unlawfully processed, the data needs to be erased to comply with a legal obligation;
- to ask for the processing of that information to be restricted if the accuracy of that data is contested, the processing is unlawful, the personal data is no longer necessary for the purposes for which it was collected or you exercise your right to object (pending verification of whether there are legitimate grounds for processing); or

- to ask for data portability if the processing is carried out by automated means and the legal basis for processing is consent or contract.

Should you have any issues, concerns or problems in relation to your data, or wish to notify us of data which is inaccurate, please let us know by contacting us using the contact details above. In the event that you are not satisfied with our processing of your Personal Data, you have the right to lodge a complaint with the relevant supervisory authority at any time. The relevant supervisory authority in the UK is the Information Commissioner's Office (ICO). The ICO's contact details are available here: <https://ico.org.uk/concerns/>

What we ask of you

- **Keeping your information accurate and up to date.** If your information changes for any reason, for example if you change your name, address, then you should inform us of the change as soon as possible so that we can ensure your information is kept accurate and up to date. You can do this by simply informing your contact within Macro or email our legal team who will oversee the changes at MacroLegal@macegroup.com.
- **Business cards.** If you issue business cards to us your data will be processed by those who you share the business cards with. It is reasonably expected that the data will only be processed by those you share it with for business purposes, principally, to contact you in relation to your role and your business.

Definitions

EU GDPR: Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing directive 95/46/EC as updated, superseded or repealed from time to time.

UK GDPR: The retained EU law version of the General Data Protection Regulation ((EU) 2016/679) as it forms part of the law of England and Wales, Scotland and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018, as modified by Schedule 1 to the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019, as updated, superseded or repealed from the time to time.

Personal data: Any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier, such identifiers including name, location data or online identifier.

Special category personal data: includes data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

Changes to our privacy notice

This notice may be updated from time to time. Please check this page on our website for any changes.

Contact us

Questions, comments and requests regarding this privacy notice are welcomed and should be addressed to:

By post: DPCM, Macro Group, 155 Moorgate, London EC2M 6XB

By email: MacroLegal@macegroup.com

Cookies

We use cookies and similar technology to distinguish you from other users of our site. This helps us to provide you with a good experience when you use our site and also allows us to improve our site.

Cookies are small files stored on your computer. They are downloaded by your internet browser and are designed to store information so your computer or website can use them to find out things like whether you've been to the site before or if you're logged in.

We use the following cookies for the following purposes:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website.
- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you and remember your preferences.
- **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website more relevant to your interests.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Service	Cookie name(s) used	Purpose
Universal Analytics (Google)	__utma, __utmb, __utmc, __utmz	These cookies are used to collect information about how visitors use our website. We use the information to report and to help us improve the website. The cookies collect information in an anonymous form, including the number of visitors to the website, where visitors have come to the website from and the pages they visited. Read Googles Overview of Privacy and Safeguarding data.

To find out more information about cookies and how to manage them, <http://www.allaboutcookies.org/cookies/> is a site produced by the Interactive Advertising Bureau (IAB), an industry body.

Modern browsers will allow you to disable cookies per site using their options/preferences settings.