

## PRIVACY NOTICE

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### 1. Scope

All data subjects whose data is processed by CEPAC.

### 2. Responsibilities

The GDPR Representative is responsible for ensuring that this notice is placed in front of potential data subjects prior to CEPAC collecting/processing their personal data.

All Employees of CEPAC who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

### 3. Fair Processing Notice

What is Personal Data?

Under the EU's General Data Protection Regulation:

Personal Data is defined as "any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

Special Categories of Personal Data

Certain data are classified under the Regulation as "special categories":

- Racial
- Ethnic origin
- Political Opinions
- Religious Beliefs
- Trade-union membership
- Genetic Data
- Biometric Data
- Health Data
- Data concerning a natural person's sex life
- Sexual orientation
- Other

Consent is required for CEPAC to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

#### **Why does CEPAC need to collect and store personal data?**

In order for us to provide manufacturing services, promote our goods and service, maintain our accounts and records and to support and manage our staff we need to collect personal data for correspondence purposes, employment records, payment of our employees and to provide a manufacturing service to our customers. In any event, we are committed to ensuring that the information we collect, and use is appropriate for this purpose, and does not constitute an invasion of your privacy. We may pass your personal data on to our service providers who are contracted to CEPAC in the course of dealing with you. Our contractors are obliged to keep your details securely and use them only to fulfil the service they provide you on our behalf. Once your service need has been satisfied or the case has been closed, they

will dispose of the details in line with CEPAC's procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do so.

**How CEPAC uses your information**

CEPAC will process – that means collect, store and use – the information you provide in a manner that is compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date and not keep it for longer than is necessary. In some instances, the law sets the length of time information has to be kept, but in most cases CEPAC will use its discretion to ensure that we do not keep records outside of our normal business requirements.

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

**Using your personal data**

Annex 1 sets out how we use your personal information.

***Document Owner and Approval***

The GDPR Representative is the owner of this document and is responsible for ensuring that this procedure is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to members of staff on the company self-service system.

This procedure was approved by the Group Managing Director on 18<sup>th</sup> December and is issued on a version-controlled basis.

<b>Document Control:</b>	
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