



Privacy policy

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Overview

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1. About

This Privacy Notice relates specifically to the processing of personal information by APN GROUP HOLDCO LIMITED (hereafter “we”, “our, and “us”), which is the ultimate holding company of the APN Group. The Group structure encompasses other legal entities each of which undertake differing operational and data processing tasks. Where relevant please refer to the specific Privacy Statements of the legal entity involved, a link to which is clearly given on each respective website.

Controlling and consolidating the activities of the Group requires us to process personal information belonging to, our employees, clients, professional advisors, suppliers and other third parties with which we interact. This Privacy Notice explains how we collect personal information and what we do with it. It also tells you about your privacy rights and how the law protects you.

If you have a question on this Privacy Notice or how we use your personal information, please see the ‘How to contact us’ section below for details of how to get in touch.

2. Data protection principles

We are the data controller of the personal information that we process, i.e. the organisation which determines how your personal information is processed and for what purposes. This means that we

are legally responsible for ensuring that we comply with the UK General Data Protection Regulation and Data Protection Act 2018 (“**UK Data Protection Law**”), which states that any personal information we hold about you must be:

- ▲ Kept securely.
- ▲ Kept only as long as necessary for the purposes we have told you about.
- ▲ Accurate and kept up to date.
- ▲ Relevant to the processing purposes we have told you about and limited only to those purposes.
- ▲ Collected only for valid purposes and not used in any way that is incompatible with those purposes.
- ▲ Used lawfully, fairly and in a transparent way.

3. Categories of personal information that may be processed

The personal information relating to you that we collect and receive from yourself (or an authorised representative) and from third parties may include but not be limited to any or all the following:

Data Type	What It Includes
Identification information	This may include your name, date of birth, residency financial information, domestic and business addresses and your vehicle registration number.
Contact details	This may include your name, postal address, telephone number, social media accounts and email address(es).
Browsing information	This may include metadata including geolocation, browser type, pages visited, device type and time and date of visit. We may use cookies or similar technology to collect such information. Information gathered by cookies or similar technologies may be used for our business purposes such as analytics, research, digital advertising, and operational purposes. You may set your browser to notify you when a cookie is sent or refuse cookies altogether but certain features of this site may not work without cookies.
Interactional data	When you meet with us (either in person or virtually) we may also collect and record visual and audio images.

Management data

Most notably in the case of employees, we may collect financial and preference information that you provide, and will collect recruitment, education, health, and employment records.

4. Sources from which your personal information is collected

For the furtherance of trade, we need to collect and process your personal information. This will include Information you give to us: When you talk to us on the phone, in emails and letters, and when you use our website. This will also include information from third parties, such as:

- ▲ Other companies within the APN Group.
- ▲ External parties, for example companies that enhance and cleanse personal data.

5. The lawful basis on which we may process your personal information

We will only process your personal information where we are permitted to do so by law. This is called our 'lawful basis' for processing.

We have identified the following lawful bases for the processing of data:

- ▲ You have provided us with your consent to use your personal information companies within the APN Group.
- ▲ It is necessary for the performance of a contract between you and/or an organisation that you represent and us.
- ▲ To meet our legal obligations (GDPR Art 6(1)(c) UK GDPR). For example, in relation to health and safety, tax and national insurance and financial record keeping.

The majority of our uses are mandatory - in other words, where we need to use your personal information to meet our contractual or legal obligations. We have provided more information in the 'How we may use your personal information' section below on what personal information we use, why and which of the above categories we are relying on for each purpose. We may use your personal information for more than one purpose, depending on the circumstances.

6. Legal basis for processing special category or criminal offence data

- ▲ We have a number of employment law duties and obligations, which require us to process special category and criminal conviction data, including those relating to ensuring the fair treatment of employees, and maintaining a safe and secure working environment.
- ▲ Where necessary, special category data will be processed for the purposes of preventive or occupational medicine, to assess the working capacity of an employee.
- ▲ Certain processing may also be necessary including to enable the establishment, exercise, or defence of legal claims.

7. How we may use your personal information

All personal information that we receive is processed in accordance with this Privacy Notice. We collect and process information for a number of different reasons but primarily to ensure individuals that engage with our organisation receive relevant information and that we meet our statutory, contractual, and legitimate business requirements.

We list below some examples of the reasons that we process personal data:

- ▲ To provide information and support communications with those with whom we trade.
- ▲ To support and manage our employees and to provide services to them.
- ▲ To maintain our accounts, administer our records, and maintain our infrastructure (physical and electronic including our website).
- ▲ To manage internal support functions, corporate administration, and other business-related functions.
- ▲ To keep individuals safe and maintain safe and secure workplaces.
- ▲ To manage complaints, incidents and accidents.
- ▲ To promote the services of the Group.

8. Sharing of your personal information

We will not share your information with third parties outside of APN Group except where:

- ▲ We have a legal or contractual requirement to do so – for example, meeting our statutory obligations to report to central government.
- ▲ It is required for us to provide it to any duly authorised sub-contractors with whom we are in contract.

- ▲ We may pass your information to our third-party service providers for the purposes of completing tasks and providing services on our behalf. When we use a third party service we will disclose only the personal information that is necessary for them to deliver the service. We will firstly have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes.

We do not send or process any personal information outside of the UK and EU. We never share your personal information with external companies for the purposes of their marketing.

9. Our timelines for the retention of your data

Your personal information is retained by us in accordance with applicable law and regulation. Our data retention periods vary depending on the nature and context of the personal information that we have in our care, and are calculated taking into account the following factors:

- ▲ Potential claims or litigation.
- ▲ Guidance from official bodies such as relevant data protection supervisory authorities and professional regulatory bodies.
- ▲ How long we need to keep the data to fulfil the original purpose for which it was collected.
- ▲ The nature and sensitivity of personal data.
- ▲ Legal obligations to which we are subject.

We will not retain your information for longer than is reasonably necessary for the purposes outlined in this Privacy Notice but may retain any personal information for up to 6 years, unless there are specific circumstances compelling us to retain the client files for a longer period e.g., an ongoing legal dispute.

10. How we protect your personal information

We always seek to protect the privacy of your information. Any personal information that you choose to send to us will be stored and, where applicable, processed in a safe and secure manner.

We limit access to our buildings to those that we believe are entitled to be there. Access controls to our information technology are in place and appropriate procedures and technical security measures are in place to safeguard your information across all our computer systems, networks and data storage locations.

11. Your data subject rights under the UK Data Protection Law

Under the UK Data Protection Law, data subjects have several rights in relation to their personal information. Subject to certain exemptions, these rights can be exercised in relation to your personal information. These rights include:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. The contact details are given below.

12. How to contact us

If you have any concerns about our use of your personal information, wish to exercise any of your rights listed above or have any questions or complaints in relation to the content of this Privacy Notice please get in contact by:

- ✦ Emailing our appointed Data Protection Officer at dpo@apn.co.uk (subject heading: Data Subject Rights - Your Name); or
- ✦ writing to us at: APN Group, 4th Floor, 145 Leadenhall Street, London, United Kingdom, EC3V 4QT (attention of: Data Protection Officer).

13. Escalation

You can also and additionally complain to the ICO if you are unhappy with how we have used your data. The ICO's address is:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>