



## **Non-employee Privacy Notice**

Navitas Engineering Limited (referred to as "Navitas" or "the company" throughout this notice) collects and processes personal data of non-employees as part of its day to day operation. This notice applies to all personal data received by the company in any format, including electronic, paper, or oral.

This notice sets out the basis on which Navitas collects, uses, and discloses the personal data of non-employees, as well as the rights of non-employees in respect of this data.

### ***Your personal data***

In this Notice, "your personal data" means information about you from which you can be identified (such as name, address, email address, telephone number, or other identifiers that permit the physical or online contacting of a specific individual) or that is associated with an identifiable person (such as demographic information or information about a person's activities when such information is linked to personally identifying information). Your personal data does not include data where the identity has been removed (anonymous data).

We collect, use and disclose personal data to operate our business and as required by law.

Personal data may be collected from a variety of sources. For example, when you have a telephone conversation with one of our representatives, we may collect a recording of those conversations. Your call may be recorded for quality and training purposes, to resolve concerns, and to detect and prevent fraud. If you choose to contact us by email or mail, we may retain your email or mailing address, the content of your communication, and our response.

We may collect your personal data when you visit our offices in our visitors' database, which may include, but is not limited, to name, company name, phone number, email address, date and time of the visit, photograph, copy of government issued ID, etc. Video footage is also captured via our CCTV system installed on our Company's premises. We collect your personal data to ensure the physical security of the people and facilities and the security of confidential information you may be exposed to during your visit.

We may also receive information from third parties with whom we have business relationships. Where we combine third-party information with other personal data that we have collected from you, this Policy governs our use of such information.

Subject to our Website Privacy Notice, we may also collect personal data when you visit or use the services on our websites, register or apply for one of our products or services, interact with us through social media, or engage with us in any way.

When you provide personal data to us, we expect that you have authority to consent to its collection, use, and disclosure as outlined in this Policy. If you communicate with us, or provide personal data to us in any way, you acknowledge your consent for personal data collection, use and disclosure as set out in this Policy, applicable laws, and industry standards. If we want to use your personal data for a purpose that was not disclosed at the time of initial consent, consent will be sought at the time of this new purpose.

### ***Why does Navitas process personal data?***



In general, we use the personal data we collect for access management to our physical sites; to provide you with information, products, and services you request, or services we think will be of interest to you; and to administer and assist us with the operation of our business. For example, we may use the personal data we collect to:

- respond to your emails, submissions, comments, requests, or complaints;
- provide you with the services, products, or information you requested;
- verify your identity where required;
- contact you about our products, services, and for other marketing, informational, product development, and promotional purposes by post, email, or telephone;
- request feedback and to enable us to develop, customize and improve our information and services;
- maintain our records; prevent and detect crime, fraud, or corruption;
- process financial transactions; and
- enhance compliance with our legal responsibilities and the policies, rules, and other agreements governing the Sites in order to protect the online community and the overall integrity of the Sites.

#### ***Who has access to data?***

We may share your information internally within the company for the purposes outlined above.

We will not share your data with third parties. Unless, in the case of recruitment, your application for employment is successful and an offer of employment is made. In that case, we will share your data with former employers or other referees in order to obtain references.

In addition, we may need to share your personal information with a regulator or otherwise to comply with the law.

#### ***For how long does Navitas keep data?***

We maintain a Data Policy Policy which sets out the retention timelines for the categories of personal data that we process.

Navitas will only retain your personal data for as long as is reasonably necessary to provide you with the services you have engaged with us to provide, or as is legally required and permitted.

#### ***How does Navitas protect personal data?***

We strive to protect your personal data while it is under our control. We maintain appropriate organizational, physical and technical security measures to protect your personal data against unauthorised or unlawful processing and/or against accidental loss, alteration, disclosure or access, or accidental or unlawful destruction of or damage thereto. We have internal controls and relevant policies and procedures to maintain these measures taking into account the risk associated with the categories of personal data and processing we undertake.

If a data breach involving your personal data occurs, or we suspect that a data breach has occurred, we will expeditiously conduct an investigation, and assessment and take necessary remediation actions.



### ***Your rights***

As a data subject, you have a number of rights under data protection law. You can:

- access and obtain a copy of your data on request;
- require Navitas to change incorrect or incomplete data;
- require Navitas to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where Navitas is relying on its legitimate interests as the legal ground for processing; or
- ask us to transfer your data to another organisation.

If you would like to exercise any of these rights or if you have any questions about this notice or our processing of your data more generally, please contact [info@navitasengineering.com](mailto:info@navitasengineering.com)

If you believe that the company has not complied with your data protection rights, you can complain to the Information Commissioner's Office (<https://ico.org.uk/>).