



Privacy Statement

The purpose of this privacy statement is to explain how TMO Traffic Highways Ltd (TMO) processes personal data to fulfil our data protection responsibilities in general terms for the benefit of its customers and suppliers. The scope covers all related activities undertaken the staff and support staff of TMO. This statement is provided for information only and is unconditional on the engagement of our services.

The role of TMO in data protection terms is that of a data controller where it determines the purpose and use of the personal data being processed. It is the responsibility of the privacy manager (PM), to ensure it is processed in accordance with the UK's latest data protection legislation. The PM can be contacted using privacy@tmohighways.co.uk or in writing to Privacy Manager, TMO Highways, Roy Humphrey Group, Ipswich Road, Eye, IP23 8AW.

The sort of personal data processed by TMO will be your basic contact details sufficient to answer your queries and to deliver our services to you. Although the information being requested will be kept to a minimum but if we do not receive this, it may impact our ability to fulfil our obligations to you.

TMO's duty of confidentiality means that our staff will treat your personal data with respect and in confidence. It will only be disclosed to staff that need to know it. We also expect the same duty of confidentiality of all third parties with whom we share your personal data. We use appropriate organisational and technical measures to secure all company information. All processing takes place on-site with routine back-ups performed on UK based servers.

TMO processes personal data against a lawful basis in instances described below:

- To respond to your general enquiries and stay in touch with you after the service/product has been delivered, we will do so in pursuit of our legitimate interests
- When collecting images via our on-board operational vehicle CCTV systems as well as our on-site premises CCTV, we do so in support of our legitimate interests
- When necessary for the performance of a contract with you and its prior preparation
- To comply with our legal obligations such as those required for HMRC purposes
- When processing for a pre-defined purpose for which your consent will be sought prior to that processing commencing, but please note that you will always be able to withdraw your consent at any time by contacting the PM

In all cases the processing of your personal data by TMO shall be in accordance with the principles of data protection, as set out in the UK data protection legislation.

TMO will share personal data, if necessary, with some or all of the following third parties:

- The Inland Revenue (HMRC) for invoice purposes
- External auditors when conducting routine H&S, environmental and quality checks
- Solicitors appointed by TMO to handle any client/customer matters if necessary
- Accountants appointed by TMO for payment handling and related record keeping

- An IT support company which is subject to a data processing agreement?
- Contractors for outsourced services who are subject to an NDA
- Third-party suppliers when needed to deliver products directly to our customers

TMO follows a retention schedule to determine the length of time it holds different types of personal data. The relevant parts of the schedule are shown below:

- General correspondence with potential clients that does not lead to a quotation or sale for services/products, will be retained for 6 years after our last contact with you
- Personal data collected for the preparation of a contract, will be retained for the duration of the activity plus 6 years after our last contact with you
- Personal data processed on behalf of temporary agency staff will be retained for 6 months after the last engagement, for external auditing purposes
- Minimal contact data is stored indefinitely although all requests for erasure will be considered and actioned appropriately
- Financial records and invoices, which may include personal data, will be retained for 6 years after the end of the current tax year of processing
- By exception, documentation that includes personal data may be retained by TMO beyond the schedule, but only for a specific purpose and only when TMO believes there is a legitimate interest or a legal obligation to do so

At the end of the retention schedule TMO will either return, destroy or delete your personal data and any associated emails or relevant documentation. If it is technically impractical to delete electronic copies of personal data, it will put it beyond operational use. TMO allows up to 3 months after the retention schedule to complete this action.

The TMO websites use cookies (and similar technologies) and all but those deemed to be strictly necessary, require your permission before they are dropped. Please note that there are links on our website that may be of interest to you, but TMO is not responsible for the processing of your personal data by such websites.

TMO uses CCTV in support of its legitimate interests of the prevention and detection of crime on its premises, and to optimise the operational use and safety of our vehicle fleet using on-board 'dashcam' systems. The use CCTV is subject to TMO's policies and internal procedures.

The UK General Data Protection Regulation defines the rights that you have (although these do not apply in all situations). For convenience, these rights are shown below:

- **Right to be informed** as to how your personal data is being processed by us – this is done through this statement or specific privacy notices that may be issued separately
- **Right to access** your personal data held by us which is done by making a 'Data Subject Access Request' (DSAR) to the TMO privacy manager
- **Right to rectification** of your personal data if you believe TMO has collected or recorded it incorrectly, or it needs to be updated
- **Right to erasure** of your personal data for which we no longer have a legitimate purpose to process or where your interests outweigh our own
- **Right to restrict processing** under certain circumstances, during which time your personal data but will not be in operational use until the related matter is resolved
- **Right to data portability** of your personal data in a machine-readable version, as you have

provided but only applicable to data provided with your consent or under contract

- **Right to object** to TMO processing your personal data for which there is no associated legal or contractual obligation
- **Rights related to automated decision making and profiling** (however TMO does not use these techniques in its decision making)

Further details about your rights can be found on the Information Commissioner's Office (ICO) website: <https://ico.org.uk>.

Raising concerns, exercising rights or making queries about our processing of your personal data can be done by contacting the privacy manager. Please be aware that we will need to verify your identity before responding fully, therefore, you may be asked for proof of your ID. Alternatively, you may wish to contact the ICO directly, using the details provided above, but naturally we would welcome the opportunity to handle any concerns you have first.

V3

December 2023

Signed by _____ *Jo Balding* _____ Date _____ 1/12/2023 _____

On behalf of TMO Highways, Finance Director

Last Reviewed 1/12/23

Next Review 1/12/24