

BDM TALK LTD t/as BDM CX

DATA PROTECTION & PRIVACY POLICY

1. PURPOSE OF THIS POLICY

BDM Talk Ltd trading as BDM CX (“BDM CX”, “the Company”, “we”, “us” or “our”) is committed to protecting the privacy, confidentiality, integrity and security of Personal Data processed in the course of our business activities.

This Policy sets out how BDM CX collects, processes, stores, transfers and protects Personal Data in accordance with:

- The UK General Data Protection Regulation (“UK GDPR”);
- The Data Protection Act 2018;
- The Privacy and Electronic Communications Regulations 2003 (“PECR”);
- The EU General Data Protection Regulation where applicable (“EU GDPR”);
- The Protection of Personal Information Act 4 of 2013 (“POPIA”) where applicable;
- Any other applicable privacy and data protection legislation.

This Policy applies to:

- employees;
 - contractors;
 - temporary workers;
 - agency staff;
 - consultants;
 - clients;
 - suppliers;
 - candidates;
 - data subjects;
 - and any third parties processing Personal Data on behalf of BDM CX.
-

2. DATA PROTECTION PRINCIPLES

BDM CX shall comply with the following principles when processing Personal Data:

1. Personal Data shall be processed lawfully, fairly and transparently.
 2. Personal Data shall only be collected for specified, explicit and legitimate purposes.
 3. Personal Data shall be adequate, relevant and limited to what is necessary.
 4. Personal Data shall be accurate and kept up to date where necessary.
 5. Personal Data shall not be retained longer than necessary.
 6. Personal Data shall be processed securely and confidentially.
 7. Appropriate technical and organisational measures shall be implemented.
 8. BDM CX shall be accountable for compliance with applicable Data Protection Legislation.
-

3. DEFINITIONS

For the purposes of this Policy:

“Personal Data” means any information relating to an identified or identifiable natural person.

“Special Category Data” includes information relating to:

- racial or ethnic origin;
- political opinions;
- religious beliefs;
- trade union membership;
- health data;
- biometric data;
- sexual orientation;
- criminal convictions or offences.

“Processing” means any operation performed on Personal Data including:

- collection;
- recording;
- storage;
- retrieval;
- transmission;
- disclosure;
- destruction.

“Data Subject” means the individual to whom Personal Data relates.

“Controller” means the entity determining the purposes and means of processing.

“Processor” means a person or organisation processing Personal Data on behalf of a Controller.

4. LAWFUL BASIS FOR PROCESSING

BDM CX shall only process Personal Data where a lawful basis exists, including:

- Consent;
- Performance of a contract;
- Compliance with legal obligations;
- Legitimate business interests;
- Protection of vital interests;
- Performance of tasks carried out in the public interest.

Where Special Category Data is processed, BDM CX shall ensure an additional lawful condition applies under applicable legislation.

5. TYPES OF PERSONAL DATA PROCESSED

BDM CX may process the following categories of Personal Data:

Employee & Contractor Data

- names and addresses;
- telephone numbers;
- email addresses;
- payroll information;
- bank details;
- national insurance numbers;
- right to work documentation;
- employment history;
- qualifications;
- disciplinary and grievance records;
- attendance records.

Recruitment Data

- CVs and applications;
- interview notes;
- references;
- qualification records;
- background checks.

Client & Supplier Data

- business contact information;
- financial and billing information;
- contractual documentation;
- correspondence.

Operational Data

- call recordings;
- CCTV footage;
- system access logs;
- IP addresses;
- communication records.

6. SPECIAL CATEGORY DATA

BDM CX recognises that Special Category Data requires enhanced protection.

Such data shall only be processed:

- where strictly necessary;
 - where legally permitted;
 - and subject to additional security controls.
-

7. DATA SUBJECT RIGHTS

Data Subjects have the following rights:

- Right of access;
- Right to rectification;
- Right to erasure;
- Right to restrict processing;
- Right to object;
- Right to data portability;
- Rights relating to automated decision-making;
- Right to withdraw consent;
- Right to complain to the Information Commissioner's Office ("ICO").

Requests shall be handled promptly and in accordance with statutory timeframes.

8. SUBJECT ACCESS REQUESTS (SARs)

BDM CX shall:

- acknowledge SARs promptly;
 - verify identity where appropriate;
 - provide responses within one calendar month unless extended lawfully;
 - ensure redactions are lawful, proportionate and justified;
 - maintain records of requests and responses.
-

9. DATA SECURITY

BDM CX shall implement appropriate technical and organisational security measures including:

- password protection;
- access controls;
- multi-factor authentication where appropriate;
- encryption;
- secure backups;
- firewalls and anti-malware systems;
- restricted access to confidential information;
- secure destruction procedures;
- physical office security;

- confidentiality obligations for staff.

All employees and contractors must take reasonable steps to protect Personal Data.

10. DATA BREACHES

Any actual or suspected Personal Data Breach must be reported immediately to management.

BDM CX shall:

- investigate breaches promptly;
 - assess risks to individuals;
 - maintain breach records;
 - notify the ICO where legally required;
 - notify affected individuals where high risk exists.
-

11. INTERNATIONAL DATA TRANSFERS

BDM CX may transfer Personal Data internationally where operationally necessary, including transfers between:

- the United Kingdom;
- South Africa;
- the European Economic Area (“EEA”);
- and other jurisdictions.

Where international transfers occur, BDM CX shall ensure appropriate safeguards are implemented including:

- adequacy regulations;
 - International Data Transfer Agreements (“IDTAs”);
 - Standard Contractual Clauses (“SCCs”);
 - contractual confidentiality obligations;
 - appropriate technical security measures.
-

12. DATA RETENTION

Personal Data shall only be retained for as long as necessary for:

- legal purposes;
- contractual purposes;
- operational requirements;
- regulatory compliance.

Indicative retention periods include:

Record Type	Retention Period
Recruitment records	12 months
Employee records	6 years after termination
Payroll records	7 years
CCTV recordings	Typically 30–90 days
Health & safety records	As legally required
Financial records	6–7 years

Secure destruction procedures shall apply following expiry of retention periods.

13. USE OF THIRD PARTIES & SUB-PROCESSORS

BDM CX may engage third-party providers including:

- payroll providers;
- cloud hosting providers;
- recruitment platforms;
- IT support providers;
- EOR partners;
- outsourced service providers.

BDM CX shall take reasonable steps to ensure such providers:

- maintain appropriate security standards;
- comply with Data Protection Legislation;
- process data only on documented instructions.

14. EMPLOYEE RESPONSIBILITIES

All employees, contractors and temporary staff must:

- comply with this Policy;
- maintain confidentiality;
- only access Personal Data where authorised;
- report suspected breaches immediately;
- complete required training.

Failure to comply may result in disciplinary action.

15. MONITORING & COMMUNICATIONS

BDM CX reserves the right, where lawful and proportionate, to monitor:

- business communications;
- telephone calls;
- emails;
- internet usage;
- system activity;
- CCTV systems.

Monitoring shall be conducted for legitimate business purposes including:

- security;
 - quality assurance;
 - regulatory compliance;
 - fraud prevention;
 - training;
 - operational management.
-

16. POLICY GOVERNANCE

This Policy shall be reviewed periodically and updated where necessary to reflect:

- legislative changes;
- operational changes;
- regulatory guidance;
- best practice.

BDM Talk Ltd t/as BDM CX. Greenacre Court, Station Road, Burgess Hill, West Sussex, United Kingdom, RH15 9DS www.bdmcx.com. Company registration number 09351269

Management shall retain overall responsibility for compliance.

17. CONTACT DETAILS

Questions relating to this Policy or data protection matters should be directed to:

Data Protection Contact

BDM Talk Ltd t/as BDM CX

Email: [INSERT EMAIL ADDRESS]

Registered Office: [INSERT REGISTERED OFFICE]

18. ICO COMPLAINTS

Individuals have the right to complain to:

Information Commissioner's Office

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Website:

<https://ico.org.uk>