

## 1. Introduction

This privacy notice describes how we collect and use personal information about you before, during and after your working relationship with us in accordance with the General Data Protection Regulation (GDPR). It applies to personnel that do not work for Marshall ADG directly, but are working on a Marshall ADG site collaboratively with Marshall ADG's staff Referred to as 'Marshall ADG Partners' or 'you' in this document.

## 2. Responsibilities

- 2.1 The Data Privacy Manager is responsible for ensuring that this notice is made available to data subjects prior to Marshall ADG collecting/processing their personal data.
- 2.2 All Employees/Staff of Marshall ADG 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. Privacy notice

### 3.1 Who are we?

In the context of this Privacy Notice 'Marshall ADG' refers to a group of different legal entities, details of which can be found [here](#).

This Privacy Notice is issued on behalf of the group of companies known as Marshall ADG, so when we refer to 'Marshall ADG', 'The Company', 'we', 'us' or 'our' in this Privacy Notice, we are referring to the relevant company responsible for processing your personal data.

The entity which will be the controller for your data is the entity with which you have entered into a contract of employment, consultancy, voluntary agreement or partnership.

Our Data Privacy Manager and Security can be contacted directly here:

- [DataPrivacyManager@marshalladg.com](mailto:DataPrivacyManager@marshalladg.com) (Marshall ADG Data Privacy Manager)
- 01223 373206
- [security.management@marshalladg.com](mailto:security.management@marshalladg.com) (Marshall ADG Security Department Rep)
- 01223 399438

### 3.2 Personal data types:

Personal data is any information that identifies a living individual such as name, an identifying number (e.g. National Insurance No, Clock No), location or physical characteristics associated to that individual. It can be an opinion of someone, or any information that when combined together identifies the person. In the context of this document this data will be referred to as ordinary.

Some personal data is classed as "special category data". This is data referring to race/ethnicity, religious beliefs, sexual orientation, political opinions, trade union membership, information about your health, genetic and biometric information and criminal records.

### 3.3 **We may collect and process the following personal data about you:**

#### **Ordinary personal data**

- Your Name, Address and contact details, including Email Address and telephone, Date and Place of Birth, National Insurance Number.
- Nationality, Immigration Status, 5 Year Personnel and Occupational History Details.
- Passport, Written Confirmation of current Employment.
- MoD Secrets and Confidentiality Declaration (this contains your Name & Signature)

#### **Special category personal data**

- Self-Criminal Record Declaration
- Criminal Record Check (if appropriate)
- 5 Year Personnel and Occupational History Details (which by its content elevates it to special category)

### 3.4 **The personal data we collect will be used for the following purposes:**

To formulate a Baseline Personnel Security Standard for pre-employment screening of Data Subjects to enter a List X Security Controlled site. This provides the UK Cabinet Office with a level of assurance to allow ongoing entrance to site.

Our legal basis for processing of the personal data is contractual. Marshall ADG carry out work on behalf of the UK Government as part of an undertaking of these contracts all personnel on site must have been security cleared in accordance with:

- HMG Baseline Personnel Security Standard Version 5.0 – January 2018

### 3.5 **Disclosure**

Marshall ADG will not pass on your personal data to any third party without first obtaining your written consent and as such will only be supplied to the third party that you wish us to notify.

### 3.6 **Retention period**

Marshall ADG Security Department will process and store personal data for the duration of your engagement with Marshall ADG plus 1 year.

### 3.7 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to ask for data that we hold about you that is inaccurate or incomplete to be corrected.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records. If there is no overriding legal reason to keep it.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing
- Right to object to automated processing, including profiling – You have the right to ask for certain important computer-made decisions (including profiling) to be challenged and to ask for a human to intervene.  
(Please note that at this time no automated processing of Personal Identifiable Information (PII) is in operation.)
- In the event that Marshall ADG refuses your request under rights of access, we will provide you with a reason as to why.  
You have the right to complain as outlined in clause 3.10 below.

All of your rights identified above apply to any third party (as stated in 3.6 above) should they be involved in the processing of your personal data.

If you would like to exercise any of these rights, please contact the company Data Privacy Manager, Isobel Aylott, by emailing [DataPrivacyManager@MarshallADG.com](mailto:DataPrivacyManager@MarshallADG.com) or by sending written correspondence to The Data Privacy Manager, Marshall ADG, Airport House, Newmarket Rd, Cambridge, CB5 8RX.

You can make a subject access request by completing the organisation's [Subject Access Request Form](#)

### 3.8 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Marshall ADG (or third parties as described in 3.6 above), or how your complaint has been handled, you have the right to lodge a complaint directly with Marshall ADG's Data Privacy Manager, by emailing [DataPrivacyManager@MarshallADG.com](mailto:DataPrivacyManager@MarshallADG.com) or by sending written correspondence to The Data Privacy Manager, using the contact details below.

If the complaint is not resolved to your satisfaction you have the right to lodge the complaint with the Supervisory Authority.

The details for each of these contacts are:

	<b>Data Privacy Manager</b>	<b>Supervisory Authority</b>
Contact Name:	Isobel Aylott	Information Commissioners Office (ICO)
Address line:	Marshall ADG, Airport House, Newmarket Rd, Cambridge, CB5 8RX	Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF
Email:	<a href="mailto:DataPrivacyManager@MarshallADG.com">DataPrivacyManager@MarshallADG.com</a>	<a href="https://ico.org.uk/global/contact-us/email/">https://ico.org.uk/global/contact-us/email/</a>
Telephone:	01223 373206	03031231113
Website		<a href="https://ico.org.uk/concerns/">https://ico.org.uk/concerns/</a>

The recommended method of communication to the ICO is via their website

**Document Owner and Approval**

The Data Privacy Manager is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all members of personnel who have access to Marshall ADG sites on the [Marshall ADG Website](#).

Signature:

Date:



07/06/18

**Change History Record**

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	Data Privacy Manager	07/06/18