



Privacy Policy

We take privacy matters very seriously. We are committed to respecting and protecting your privacy and that of our clients and their customers. This policy explains how Capita handles personal data and what we expect from you.

What is personal data?

Any information that directly or indirectly identifies a natural person, such as:

- Name
- ID card number
- Image of person
- Home address
- National insurance number
- Email address
- P Number

We are committed to

- Collecting and using personal data fairly and lawfully.
- Ensuring personal data held is secure, accurate and up to date.
- Respecting individual's rights in respect of their personal data.
- Only disclosing personal data to those who are authorised to receive it.

- Not holding excessive amounts of information or keeping it longer than is necessary.

In line with our

- Human Rights Policy.
- Data Protection Standards, Procedures and Guidance.
- Client and business partner contracted commitments.

What you should expect from us

- We will conduct our business in a way that prevents unwarranted intrusion into people's privacy and protects their personal data.
- We will act in accordance with Data Protection Legislation that sets out the principles we must follow to ensure that personal data is lawfully held, securely stored, accurate and used for the right purpose.

What we expect from you

- To demonstrate the commitments of this policy by acting with integrity and sensitivity when handling personal data.

- To complete all privacy training that applies to you.
- To Speak Up if you face a situation where you are not sure what to do or have a concern in relation to this policy.
- Our **Speak Up Policy** sets out the channels available to you to do so. No action will be taken against you if you report a genuine concern whether any concerns are proven or not.

What we expect from our managers

- To ensure this policy is promoted and applied in the area you are responsible for.
- To apply our Data Protection Standards, Procedures and Guidance in their area. These set out baseline requirements and steps which must be followed. They cover:
 - Data protection impact assessments.
 - Privacy notice rules.
 - Data incident reporting.
 - Maintaining information asset registers.
 - Data retention.
 - Handling of data subject access requests.
 - Handling sub processing or transfers outside of the EEA, including the European Model Contract Clauses.

How we achieve this

- Our management teams are supported by our data protection officer and divisional privacy leads who provide advice and support on privacy matters.
- We take policy non-compliance very seriously. Privacy concerns are reported and managed through our governance mechanisms, which ultimately includes our Group Risk Committee and Capita plc Board.

For further information about this policy, please contact our Data Protection Officer: **Elvira English** Privacy@capita.com