



Privacy Policy

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

What is personal data?

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

- Name
- ID card number
- Image of person
- Home address
- National insurance number
- Email address
- IP address
- Employee "P" Number
- Biometric data
- Race/Ethnicity/Sexual orientation

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.
- Protecting personal data with the use of appropriate technical and organisational measures.
- Keeping records of the processing of our personal data as required by the Data Protection Legislation.

In line with our

- Data Privacy Standards, Procedures and Guidance.
- Workers' Privacy Notices
- 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 colleagues

- To demonstrate the commitments in this policy by acting with integrity and sensitivity when handling personal data.
- To complete all applicable privacy training.
- To Speak Up when faced with a situation where unsure what to do or when concerned about this policy.
- Our **Speak Up Policy** sets out the channels available to report concerns. No action will be taken against colleagues reporting 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 of responsibility
- To ensure obligations relating to Data Privacy as set out in the Data Privacy Standard are understood and adhered to.
- To apply our Data Privacy Standards, Procedures and Guidance in their area. These set out baseline requirements and steps which must be followed. They cover:
 - Data protection impact assessments and privacy by design and default assessments.
 - Privacy notice rules.
 - Data incident reporting.
 - Record keeping requirements
 - Data retention.
 - Handling of data subject access requests.
 - Handling of international transfers of personal data.

How we achieve this

- Our management teams are supported by our data protection officer, deputy data protection officer and divisional/TSS 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 Audit & Risk Committee and Capita plc Board.

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