



## Privacy Policy

## Authorisation

Name	Role	Date
Tahsin Choudhury	Co Founder and CEO	2 <sup>nd</sup> April 2021

## Change History

Release	Date	Author	Description
Version 0.1	March 2021	Tahsin Choudhury	Document Template
Version 1.0	2 <sup>nd</sup> April 2021	Tahsin Choudhury	Privacy Policy created

## Distribution

To	Through
All customers	Website and Email (if requested)

# Privacy Policy

## 1. PURPOSE

Ariadne Climate Limited's data protection and privacy notice sets out our commitment to protecting individual privacy and personal data, and how we implement that commitment to the collection and use of personal data in compliance with the European General Data Protection Regulations 2016 (GDPR).

This document is intended to ensure that personal information is dealt with properly and securely and in accordance with the GDPR and other related legislation. It will apply to information regardless of the way it is used, recorded and stored and whether it is held in paper files or electronically.

## 2. RESPONSIBILITY FOR PERSONAL DATA

Ariadne Climate Limited is responsible for your data. Our registered office is available upon request. Ariadne Climate Limited is the Data Controller of any personal data that we collect and process. Our CEO and other Directors of the company are accountable for establishing the framework to control the way personal data is collected, the purpose for which it is used and processed by Ariadne Climate Limited

## 3. HOW ARIADNE CLIMATE LIMITED PROCESS PERSONAL DATA

Ariadne Climate Limited is responsible for compliance with its obligations by ensuring that personal data is processed lawfully, protected from loss, misuse, unauthorised access or disclosure, excessive amounts of data is not collected or retained, they are kept up to date, stored and destroyed securely and by ensuring that appropriate security measures are in place to protect personal data, specifically:

- Processed lawfully, fairly and in a transparent manner in relation to Data Subjects.
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Accurate and, where necessary, kept up to date.
- Kept in a format which permits identification of Data Subjects for no longer than is necessary for the purposes for which the personal data is processed; and
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures

#### 4. HOW ARIADNE CLIMATE LIMITED COLLECTS PERSONAL DATA

Depending on how our services, websites or applications are used, personal data can be collected from our customers, suppliers, new business leads, employees or other third parties. Examples of how this personal data can be collected include, but is not limited to, the following:

- Job applications to join Ariadne Climate Limited - recruitment, screening/vetting forms, identification documents.
- Customer or supplier information as provided - terms and conditions of contracts, contact details.
- Communication - letters, emails, telephone calls, messages through our on-line social media platforms Computer records - usage of our website and other applications.

#### 5. PURPOSE AND LEGAL BASIS FOR PROCESSING PERSONAL DATA

Ariadne Climate Limited will only process personal data if we have a valid and lawful reason for doing so. This is to enable us to carry out our business activities, market, promote and advertise our services, maintain our own accounts and records, support and manage our employees - past, present or future. Our legal basis for processing personal data will comply with at least one or more of the following conditions:

- Consent - the consent of the Data Subject is freely given, specific, informed and unambiguous by clear explicit means for one or more specific purposes.
- Contract - processing essential to the performance of a contract or steps required to enter into a contract such as a contract of employment or contracts with customers or suppliers.
- Legal Obligation - compliance with a legal obligation to which the Data Controller is subject.
- Vital Interests - when necessary, to protect the vital interests of a Data Subject or other natural person - such as an emergency or urgent situation.
- Public Interest - when necessary in the public interest, or exercise of authority vested in the Data Controller. An example would be release of data to the Police or The Health and Safety Executive.
- Legitimate Interests - pursued by the Data Controller, or other third party, for example corporate governance and legal compliance.

#### 6. SPECIAL CATEGORIES OF SENSITIVE PERSONAL DATA

In addition to satisfying the legal basis for processing personal data above, processing of 'sensitive personal data' such as data revealing ethnic origin, political opinions, religious or philosophical beliefs, trade union membership and the processing of genetic data or biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation will be prohibited unless one of the following conditions is met:

- The Data Subject has given explicit consent.
- Processing is necessary for carrying out obligations under employment, social security, social protection law, or a collective agreement.
- Processing is necessary to protect the vital interests of a Data Subject or other natural person where they are physically incapable of giving consent.
- Processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation or not-for-profit body.

- Processing relates to personal data which is manifestly made public by the Data Subject.
- Processing is necessary for the establishment, exercise or defence of legal claims, or where courts are acting in their judicial capacity.
- Processing is necessary for reasons of substantial public interest.
- Reasons of public interest, in the area of public health; and
- Processing is necessary for reasons of preventative or occupational medicine, for assessing the working capacity of an employee, medical diagnosis, the provision of health/social care, or treatment/management of health.

## 7. **RECORD OF PROCESSING**

Depending on how our services, websites or applications are used, personal data can be collected from our customers, suppliers, leads, employees or other third parties. Examples of how this personal data can be processed include, but are not limited to, the following:

- Provision of our services to customers including Testing, Inspection and Certification services.
- Marketing, sales and promotion of our services.
- Contact details of our customers and suppliers.
- Managing our Accounts.
- Managing our Personnel Records.
- Managing our staff, contractors or other third parties employed by Ariadne Climate Ltd.

## 8. **SHARING PERSONAL DATA**

The processing and use of your personal data for consultation, advertisement, and market research purposes requires your expressed permission. Your data will not be sold or leased to third parties for such purposes.

We may be required to share personal data with third parties as a direct consequence of our business activities. In all cases, only the necessary information is shared, for example with:

- The Health and Safety Executive or other Government authority
- Contractors working under our quality management system
- The United Kingdom Accreditation Service or other such body

## 9. **KEEPING PERSONAL DATA**

Ariadne Climate Limited shall keep a Data subject's information only for as long as we need it. This will depend on why we are using the data, whether it is for providing services to you, for our legitimate business requirements or to comply with legal requirements. Ariadne Climate Limited will actively review the information we hold and when there is no longer a legal or business case for us to retain the data, it will be deleted.

## 10. **SECURITY OF PERSONAL DATA**

Ariadne Climate Limited implements technical and organisational security measures to safeguard data that we manage against inadvertent or deliberate manipulation, loss, or destruction and against access by unauthorised persons. Our security measures are continuously improved in line with

technological progress. Ariadne Climate Limited only stores data protection relevant information secured systems.

Only authorised persons and persons who are involved in the technical, administrative, or editorial supervision of data, can access this data.

All data, and especially personal data, on redundant storage devices is effectively deleted / rendered inaccessible before leaving control of Net Zero Sustainability Limited and disposal.

#### **11. AUTOMATED DECISION MAKING**

Ariadne Climate Limited does not process data solely by automated means.

#### **12. TRANSFER OF DATA ABROAD**

Ariadne Climate Limited does not transfer personal data outside of the European Economic Area (EEA).

#### **13. FURTHER PROCESSING**

If Ariadne Climate Limited wishes to process a Data Subject's personal data for a new purpose not covered by this Privacy Notice, then Ariadne Climate Limited shall provide you with a new Privacy Notice explaining this new purpose, prior to commencing the processing and setting out the relevant purpose and processing conditions.

Whenever necessary, we will seek your prior consent to the new processing.

#### **14. DATA SUBJECT RIGHTS**

As a Data Subject, you have the right to:

- Request a copy of your personal data that Ariadne Climate Limited holds about you.
- Request that the Data Controller correct any personal data that is found to be inaccurate or out of date.
- Request your personal data be erased where it is no longer necessary to retain such data.
- Withdraw our consent to processing at any time - if consent is relied upon as a processing condition.
- Request that the Data Controller provide the Data Subject with their personal data and where possible to transmit that data directly to another Data Controller (data portability).
- Request that a restriction be placed on further processing where there is a dispute in relation to the accuracy or processing of your personal data.
- Object to the processing of personal data - where processing is based on legitimate interests; and
- Lodge a complaint with The Information Commissioner's Office.

#### **15. RIGHT TO BE INFORMED**

If your personal data is not obtained directly from you, Ariadne Climate Limited will provide you with the following additional items of information within one month of having received your personal data:

- The categories of personal data we are processing; and

- The source from where the personal data originates and whether it came from publicly accessible sources.

## 16. **KEY CONTACTS**

To exercise any of your rights, or if you have any complaints concerning the processing of your personal data, please email us at [office@ariadne.global](mailto:office@ariadne.global) or write to us at Ariadne Climate Limited, 5<sup>th</sup> Floor, 167-169 Great Portland Street, London. W1W 5PF.

When you get in touch, we will respond as soon as possible and within one month. However, if your request is more complicated, it may take longer to respond. However, we will come back to you within two months of your request.

There is no charge for most requests, but if you ask us to provide a significant amount of data, we may ask you to pay a reasonable administration fee. We will also ask you to verify your identity before we provide any information to you.

## 17. **THE INDEPENDENT UK REGULATOR FOR DATA PRIVACY IS THE INFORMATION COMMISSIONER'S OFFICE**

Please note that you have the right to lodge a complaint with the supervisory authority that is responsible for the protection of personal data in the country where you live or work, or in which you think a breach of data protection laws might have taken place.

In the UK, please contact the Information Commissioner's Office by telephone on 0303 123 1113 or via their website: [www.ico.org.uk](http://www.ico.org.uk)