

## **PHSC PLC**

### **Data Protection and Privacy Policy**

This document is in two sections:.

Section 1 refers to customers, viewers using our websites and other external stakeholders.

Section 2 refers to employment of staff and contractors.

### **Section 1: For Website Users, Customers, and External Stakeholders**

#### **Introduction**

PHSC and all its subsidiary companies is are committed to ensuring the privacy and protection of personal information. This Privacy Policy outlines how we collect, use, and safeguard the data of individuals who interact with our website, use our services, or are otherwise external stakeholders. We adhere to the principles and provisions of the UK General Data Protection Regulation (UK GDPR), the EU General Data Protection Regulation (GDPR), and other applicable data protection laws.

This policy applies to:

- Visitors to our websites
- Our customers
- External stakeholders, including prospective clients and third-party partners
- Our staff and contractors

It is important that you read this policy alongside any other privacy notice we may provide on specific occasions to fully understand how and why we process your personal data.

#### **Data Protection Principles**

We are committed to processing personal data in accordance with the following principles:

- Lawfulness, fairness, and transparency: Information is processed lawfully, fairly, and in a transparent manner.
- Purpose limitation: Data is collected for specified, explicit, and legitimate purposes and not further processed in a manner incompatible with those purposes.
- Data minimisation: Only data that is relevant and limited to what is necessary will be collected and processed.
- Accuracy: Personal data will be kept accurate and up-to-date where necessary.

- Storage limitation: Data will not be retained longer than necessary for the purposes it was collected.
- Integrity and confidentiality: Data will be processed securely to protect against unauthorised access, misuse, or loss.

## What Information We Collect

We may collect, use, store, and transfer different kinds of personal data about you. This includes:

- Identity data: Name, title, username, or similar identifiers.
- Contact data: Billing address, delivery address, email address, and telephone numbers.
- Technical data: IP address, browser type, and version, time zone setting, and location.
- Usage data: Information on how you use our website and services.
- Marketing and communications data: Your preferences in receiving marketing materials from us and your communication preferences.

## How We Use Your Personal Data

We will use your personal data only when the law allows us to. Most commonly, we will use your data in the following circumstances:

- To provide services or products that you request
- To manage our relationship with you, including notifying you of changes to our terms or policy
- To administer and protect our business and website
- To deliver relevant website content and advertisements and measure their effectiveness
- To comply with a legal or regulatory obligation

## Lawful Basis for Processing

Under UK and EU data protection laws, we rely on the following legal bases to process your personal data:

- Contractual necessity: When processing is required to fulfil a contract with you or to take steps at your request before entering a contract.
- Consent: Where you have provided clear consent for us to process your personal data for specific purposes.
- Legal obligation: When processing is necessary to comply with the law.
- Legitimate interests: When processing is necessary for our legitimate interests or those of a third party, provided that your interests and fundamental rights do not override those interests.

## Sharing Your Information

We may share your personal data with:

- Third-party service providers who support our business operations, such as IT services, payment processors, and marketing agencies.
- Regulators, law enforcement, or other authorities where required by law.
- Other entities within our group of companies for internal administrative purposes.

We ensure that any third parties with whom we share your data comply with data protection regulations.

## International Data Transfers

If we transfer your personal data outside the UK or EU, we will ensure it is protected by:

- Only transferring it to countries deemed to provide an adequate level of data protection by the UK or European Commission.
- Using legally approved safeguards, such as Standard Contractual Clauses or binding corporate rules.

## Data Retention

We will retain your personal data only for as long as necessary to fulfil the purposes we collected it for, including satisfying any legal, accounting, or reporting requirements. Specific retention periods will depend on the nature of the data and the purposes it was collected.

## Your Rights

Under the GDPR, you have the following rights:

- The right to request access to your personal data
- The right to request correction of inaccurate or incomplete data
- The right to request erasure of your data where there is no valid reason for its continued processing
- The right to object to the processing of your data for direct marketing or where processing is based on legitimate interests
- The right to request restriction of processing
- The right to data portability, allowing you to obtain your data in a structured, commonly used format
- The right to withdraw consent at any time, where processing is based on your consent
- The right to lodge a complaint with a supervisory authority

## Security

We take the security of your personal data seriously and implement appropriate technical and organisational security measures to protect against unauthorised access, alteration, disclosure, or destruction.

## Updates to This Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, legal requirements, or operational needs. We encourage you to review this policy regularly.

## Contact Us

If you have any questions about this Privacy Policy or how we handle your personal data, please contact us at:

- Email: support@phsc.co.uk
  - Phone: 01622 717700
  - Address: The Old Church, 31 Rochester Road, Aylesford, Kent. ME20 7PR
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## Section 2 – Employees and Contractors

This section of our privacy policy describes how we collect and use personal information about employees, contractors and other organisations and individuals for whom we may hold personal data as part of their working relationship with companies within the PHSC plc group.

This policy is aimed at ensuring data is held, used and processed in accordance with the General Data Protection Regulation (**GDPR**).

Each subsidiary company within the PHSC plc group is a "data controller". This means that we are responsible for deciding how we hold and use personal information about our stakeholders. We are required under data protection legislation to notify staff and other stakeholders of the information contained in this privacy notice.

Section 3 of this policy applies to all stakeholders, although some sections are more relevant to employees, workers and contractors. It does not form part of any contract of employment or other contract to provide services. Section 4 of this policy relates to customers, prospects and other businesses who wish to receive information about our services, products or industry insights. We may update this policy at any time.

It is important that you read this policy, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

## Data protection principles

All subsidiary companies will comply with data protection law. This says that the personal information each subsidiary holds must be:

- used lawfully, fairly and in a transparent way;
- collected only for valid purposes that we have clearly explained and not used in any way that is incompatible with those purposes;
- relevant to the purposes we have notified and limited only to those purposes;
- accurate and kept up to date;
- kept only as long as necessary for the purposes we have advised and
- kept securely.

## Staff and Worker Data

### 3.1 The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection. We will collect, store, and use the following categories of personal information about you:

1. Personal contact details e.g. name, title, address, telephone numbers and personal email.
2. Date of birth.
3. Gender.
4. Marital status and dependants.
5. Next of kin and emergency contact information.
6. National Insurance number.
7. Bank account details, payroll records and tax status information.
8. Salary, annual leave, pension and benefits information.
9. Start date.
10. Location of employment or workplace.
11. Copy of driving licence (where relevant)
12. [Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process).]
13. Employment records (including job titles, work history, working hours, training records and professional memberships).
14. Salary remuneration and benefits history.
15. Performance information.
16. Disciplinary and grievance information.
17. CCTV footage (where applicable).
18. Information obtained through electronic means such as swipe card records.
19. Information about your use of our information and communications systems.
20. Photographs
21. We may also collect, store and use the following "special categories" of more sensitive personal information:
  - i. Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
  - ii. Trade union membership / other professional memberships.
  - iii. Information about your health, including any medical condition, health and sickness records.
  - iv. [Biometric data.]
  - v. [Information about criminal convictions and offences.]

### 3.2 How is your personal information collected?

We collect personal information about employees, workers and contactors through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies.

We will collect additional personal information in the course of job-related activities throughout the period of you working for us.

### 3.3 How we will use information about you?

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- i. where we need to perform the contract we have entered into with you;
- ii. where we need to comply with a legal obligation;
- iii. where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- iv. We may also use your personal information in the following situations, which are likely to be rare:
  - a. where we need to protect your interests (or someone else's interests); and
  - b. where it is needed in the public interest or for official purposes.

### 3.4 Situations in which we will use your personal information

We need all the categories of information in the list above at paragraph 3.1 primarily to allow us to perform our contract with you and to enable us to comply with legal obligations.

In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties [provided your interests and fundamental rights do not override those interests]. The situations in which we will process your personal information are listed below.

- i. [Making a decision about your recruitment or appointment.
- ii. Determining the terms on which you work for us
- iii. Checking you are legally entitled to work in the UK
- iv. Paying you and, if you are an employee, deducting tax and National Insurance contributions
- v. Providing employee benefits to you, e.g. private healthcare
- vi. Liaising with your pension provider
- vii. Administering the contract we have entered into with you
- viii. Conducting performance reviews, managing performance and determining performance requirements
- ix. Making decisions about salary reviews and remuneration
- x. Assessing qualifications for a particular job or task, including decisions about promotions
- xi. Gathering evidence for possible grievance or disciplinary hearings
- xii. Making decisions about your continued employment or engagement
- xiii. Making arrangements for the termination of our working relationship
- xiv. Training and development requirements

- xv. Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work
- xvi. [Ascertaining your fitness to work
- xvii. Managing sickness absence
- xviii. Complying with health and safety obligations
- xix. To prevent fraud
- xx. To monitor your use of our information and communication systems to ensure compliance with our IT policies.
- xxi. To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution
- xxii. To conduct data analytics studies to review and better understand employee retention and attrition rates
- xxiii. Equal opportunities monitoring
- xxiv. Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

### 3.5 If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

### 3.6 Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### 3.7 How we use particularly sensitive personal information

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

- i. in limited circumstances, with your explicit written consent;

- ii. where we need to carry out our legal obligations or exercise rights in relation to your employment with us.;
- iii. where it is needed in the public interest, such as for equal opportunities monitoring [or in relation to our occupational pension scheme].
- iv.
- v. less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public. [We may also process such information about staff or former staff in the course of legitimate business activities with the appropriate safeguards.]

### 3.8 Our obligations as an employer

We will use your particularly sensitive personal information in the following ways:

- i. information relating to absence, which may include sickness absence or family related leaves, to comply with employment and other laws;
- ii. information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess and take advice on your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence to include taking legal advice on how to manage sickness absence, to administer benefits;
- iii. information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting;
- iv. trade union membership / professional body membership information to premiums, register the status of a protected employee and to comply with employment law obligations];

### 3.9 Do we need your consent?

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.



### 3.10 Information about criminal convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our data protection protocols.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We will hold information about criminal convictions. We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so.

### 3.11 Data sharing

We may have to share your data with third parties, including third-party service providers and other subsidiaries in the group. We require third parties to respect the security of your data and to treat it in accordance with the law.

We may need to share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so. "Third parties" includes third-party service providers such as pension administration, benefits provision and administration, IT services and customers.

All our third-party service providers and other subsidiaries in the group are required to take appropriate security measures to protect your personal information in line with legislation. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

We will share your personal information with other entities in our group [as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data.

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

### 3.12 Data security

We have put in place measures to protect the security of your information. Details of these measures are available upon request. Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

Each subsidiary will have appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. [Details of these measures may be obtained from the subsidiary's Managing Director.

Each subsidiary will have procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

### 3.13 Data retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Each subsidiary may develop their own retention periods for different aspects of your personal information, and Managing Directors are expected to inform workers of the retention period for which personal data is held.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee, worker or contractor of the company we will retain and securely destroy your personal information.

### 3.14 Rights of access, correction, erasure, and restriction

It is important that the personal information each subsidiary holds about you is accurate and current. Please keep your Managing Director informed if your personal information changes during your working relationship with us.

Under certain circumstances, by law you have the right to:

**Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

**Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

**Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

**Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

**Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact your Managing Director in writing. You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact your Managing Director.

## Customers, Prospects and Other Organisations

### 4.1 How and What Personal Information We Collect

**Personal information you give to us:** This is information about you that you give to us by entering information via our websites, our social media pages or by corresponding with us by phone, email etc and is provided voluntarily. The information you give to us includes your name, contact details (eg phone number, email address and address), enquiry details and your opinion of our products / services.

**Personal information we collect about you:** We may automatically collect the following personal information: our web servers store as standard details of your browser and operating system, the website from which you visit our website, the pages that you visit on our website, the date of your visit, and, for security reasons, e.g. to identify attacks on our website, the Internet protocol (IP) address assigned to you by your internet service. We collect some of this information using Cookies – please see Cookies in Section 6 for further information. We may also collect any personal information which you allow to be shared that is part of your public profile on a third party social network.

**Personal information we may receive from other sources:** We obtain certain personal information about you from sources outside our businesses or other third party companies; the personal information received is as described in the two paragraphs above. We also receive training data from accrediting bodies, eg NEBOSH, IRCA which includes items such as your personal delegate number, which is used to manage your qualification records.

## 4.2 How We Use Your Personal Information

### 4.2.1 Where you have provided Consent

We may use and process your personal information where you have **consented** for us to do so for the following purposes:

- a. to share your personal information with other companies within PHSC plc so that they are able to provide you with legitimate business information relevant to your organisation;
- b. to supply brochures and other material you have specifically requested from us;
- c. to contact you via email, text message, post or telephone with marketing information about our products and services (see Marketing - Section 7 for further details);
- d. to share your personal information with accrediting bodies (eg NEBOSH, IRCA) for them to contact you with marketing information about their products and services. Please see the Marketing section below in this policy to find out more about these third parties.

You may withdraw your consent for us to use your information in any of these ways at any time, either by using unsubscribe tools provided or by contacting the Managing Director of the subsidiary with which you are dealing.

If you withdraw your consent, our use of your personal information before you withdraw is still lawful. Note that withdrawing consent for data to be shared with some accrediting bodies (eg IRCA) may result in your registration details being lost.

## 4.3 Where required to perform a Contract with you

We may use and process your personal information where it is necessary for the performance of a contract with you or in order to take steps at your request before entering into a contract with you including for the following purposes:

- To exchange information for training courses (bookings etc);
- To allow for the provision of consultancy services.
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## 4.4 Where it is in your Vital Interest

We may use your personal information to contact you if there are any urgent notices to communicate to you relevant to your organisation and relevant to the types of services we deliver. For clarification, this may include informing you of changes or updates to standards and other requirements that the subsidiary organisation works with.

## 4.5 Where required to comply with our Legal Obligations

We will use your personal information to comply with our legal obligations including: (i) to assist HMRC, the Police, or any other public authority or criminal investigation body; (ii) to identify you when you contact us; and (iii) to verify the accuracy of data that we hold about you.

## 4.6 Where there is a Legitimate Interest

We may use and process your personal information where it is necessary for us to pursue our **legitimate interests** as a business for the following purposes:

- a. for analysis, and profiling to inform our marketing strategy, and to enhance and personalise your customer experience;
- b. for market research in order to continually improve the products and services that we and our authorised dealers deliver to you;
- c. to administer our websites and for internal operations, including troubleshooting, testing, statistical purposes;
- d. for marketing activities (other than where we rely on your consent) e.g. to tailor marketing communications or send targeted marketing messages via social media and other third-party platforms;
- e. for the prevention of fraud and other criminal activities;
- f. to undertake credit checks for finance;
- g. to correspond and communicate with you;
- h. to create a better understanding of you as a customer or training delegate;
- i. for network and information security in order for us to take steps to protect your information against loss or damage, theft or unauthorised access;
- j. to comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request);
- k. for the purposes of corporate restructure or reorganisation or sale of our business or assets;
- l. for efficiency, accuracy or other improvements of our databases and systems e.g. by combining systems or consolidating records we or our group companies hold about you;
- m. to enforce or protect our contractual or other legal rights or to bring or defend legal proceedings; and
- n. for general administration including managing your queries, complaints, or claims, and to send service messages to you.

## 5 Your Rights

### 5.1 Your 'data subject' rights:

You have a number of rights in relation to your personal information under data protection law. In relation to certain rights, we may ask you for information to confirm your identity and, where applicable, to help us to search for your personal information. Except in rare cases, we will respond to you within 30 days after we have received this information or, where no such information is required, after we have received your request.

### 5.2 Accessing your personal information

You have the right to ask for a copy of the information that we hold about you by emailing or writing to us at: [marketing@phsc.co.uk](mailto:marketing@phsc.co.uk). You must provide your organisation name details and the subsidiary(ies) with which you wish to access your personal information.

We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information.

### 5.3 Correcting and updating your personal information

The accuracy of your information is important to us and we are working on ways to make it easier for you to review and correct the information that we hold about you. In the meantime, if you change your name or address/email address, or you discover that any of the other information we hold is inaccurate or out of date, please let us know by contacting the subsidiary directly.

### 5.4 Erasing your personal information or restricting its processing

In certain circumstances, you may ask for your personal information to be removed from our systems by emailing or writing to us at: [support@phsc.co.uk](mailto:support@phsc.co.uk) or contacting the Managing Director of the relevant subsidiary directly. Unless there is a reason that the law allows us to use your personal information for longer, we will make reasonable efforts to comply with your request.

You may also ask us to **restrict processing** your personal information in the following situations:

- where you believe it is unlawful for us to do so,
- you have objected to its use and our investigation is pending or you require us to keep it in connection with legal proceedings.

In these situations, we may only process your personal information whilst its processing is restricted if we have your consent or are legally permitted to do so, for example for storage purposes, to protect the rights of another individual or company or in connection with legal proceedings.

## 5.5 Complaining to the UK data protection regulator

You have the right to complain to the Information Commissioners Office (ICO) if you are concerned about the way we have processed your personal information. Please visit the [ICO's website](#) for further details.

## 6.1 Security measures to protect your personal information

All PHSC Plc subsidiary companies use technical and organisational security measures to protect the personal information supplied by you. Our security measures are continually monitored, and improved in line with technological developments.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your information whilst in transit to our website and any transmission is at your own risk.

## 6.2 Use of 'cookies'

'Cookies' are small pieces of information sent to your device and stored on its hard drive to allow our websites to recognise you when you visit.

## 6.3 Social plugins

Subsidiaries within the PHSC plc group may use so-called social plugins (buttons) of social networks such as Facebook, Linked In and Twitter. When you visit our websites, these buttons are deactivated by default, i.e. without your intervention they will not send any data to the respective social networks. Before you are able to use these buttons, you must activate them by clicking on them. They then remain active until you deactivate them again or delete your cookies.

After their activation, a direct link to the server of the respective social network is established. The contents of the button are then transmitted from the social network directly to your browser and incorporated in the website.

After activation of a button, the social network can retrieve data, independently of whether you interact with the button or not. If you are logged on to a social network, the network can assign your visit to the website to your user account. A social network cannot assign a visit to websites operated by our other group companies unless and until you activate the respective button there as well.

If you are a member of a social network and do not wish it to combine data retrieved from your visit to our websites with your membership data, you must log out from the social network concerned before activating the buttons.

We have no influence on the scope of data that is collected by the social networks through their buttons. The data use policies of the social networks provide information on the purpose and extent of the data that they collect, how this data is processed and used, the rights available to you and the settings that you can use to protect your privacy.

## **7. Marketing**

We may collect your preferences to send you marketing information directly from us by email/SMS (where applicable) including:

- a. if you register with us online; or
- b. if you book a course or request consultancy services

We will only do so if you have consented to receiving such marketing information directly from us. We may contact you with targeted advertising delivered online through social media and platforms (operated by other companies) by using your personal information, or use your personal information to tailor marketing to improve its relevance to you, unless you object.

You have the right to opt-out of our use of your personal information to provide marketing to you by using the unsubscribe mechanisms, or by emailing the subsidiary directly, or by emailing [support@phsc.co.uk](mailto:support@phsc.co.uk) giving details of your organisation and the subsidiary with whom you wish to opt-out use of your personal information.

## **8 Changes to this Policy**

We may review this policy from time to time and any changes will be notified to you by posting an updated version on our websites and/or by contacting you by email. Any changes will take effect 7 days after the date of our email or the date on which we post the modified terms on our subsidiary websites, whichever is the earlier.

We recommend you regularly check for changes and review this policy when you visit our websites. If you do not agree with any aspect of the updated policy, you must promptly notify us and cease using our services.