



Musketeer Solutions Ltd Privacy Statement

General Data Protection Regulations (GDPR)

You may be aware of the changes to data protection law on 25 May 2018. This Privacy Statement explains the processes we use to ensure that Musketeer Solutions Ltd's (MSL's) use of your personal information is clearly understood. The use of 'we', 'our' and 'us' in this Statement refers to Musketeer Solutions Ltd. MSL offers technical and business support, primarily within the military aerospace environment. We work with employees and contracted suppliers whose data needs to be processed for regulatory and business purposes.

You do not need to take any action – this is just to keep you informed. We need to process your personal information fairly and lawfully. This Statement informs you:

- Why we need your personal information
- How it will be used
- With whom it will be shared
- Your rights in relation to the information we collect

We will indicate:

- Where MSL is the data controller (the organisation which decides what personal information is collected and how it is used), and
- Where we send or direct your personal information to third parties to provide services. In these circumstances our use of data may be governed by that organisation.

MSL commits to the importance of protecting your personal and confidential information in all that we do. The law protects your privacy and says that we can use your personal information only if we have a proper reason to do so; this is termed a legitimate interest. These commercial or business reasons are to fulfil a contract MSL has with you, when it is our legal or legitimate duty, or when you consent to it. Legitimate reasons to use your information must not go against your rights or freedoms.

Why we collect and process your personal information:

WHAT MSL USES PERSONAL INFORMATION FOR	OUR REASON(S) FOR PROCESSING	OUR LEGITIMATE INTERESTS
To manage employments, agreements or contracts with MSL	Fulfilling contracts or letters of engagement; Our legal duty	Keeping records up to date; Complying with HMRC regulations
Administering payments for employment or provision of supplies or services Administering payments for sales	Fulfilling contracts	Keeping records up to date; Complying with HMRC and legal regulations Efficient business practice
Administering payroll, pensions or SIPPS, security or other arrangements in support of HR or health and safety matters for the company	Fulfilling legal or discretionary obligations	Complying with your wishes and government regulations
Managing and running our business in an efficient way. This includes managing our financial position, processes, planning and communications.	Our legal duty Our legitimate interests	Complying with regulations Being efficient in how we fulfil our business obligations
To detect, report or investigate to seek to prevent financial crime when needed to: Manage risk Comply with regulations Respond to complaints	Fulfilling our legal duty Fulfilling contracts	Developing and improving our security against fraudulent activity Being efficient and maintaining safe practices
Compliance with the security requirements of our customers or MoD	Fulfilling our legal duty Fulfilling contracts	Complying with our customers' requirements and regulations Enabling access to information

What types of personal information we process:

- Personal or organisational details such as names, addresses, telephone numbers, email addresses, dates of birth, details of cars driven
- Employment details for regulatory reasons relating to payment of salaries, pensions, sickness benefits. It may also include special categories of personal data if this is necessary. An example of this is when we process data about your health for the provision of sickness benefit
- Financial details to enable bank payments to be made for suppliers, contractors and employees
- More detailed information relating to security clearances. It may also include special categories of personal data if this is necessary. An example of this is when we need to record information about your status for baseline security reasons
- Home working arrangements to comply with statutory health and safety requirements
- Details of academic achievements, awards from professional bodies or relevant experience which demonstrates competency of individuals to undertake work

Where we collect personal information:

- From you personally in conversations, meetings or telephone calls
- Starter forms for employment or other company forms
- Communications to our company, for instance if you send CVs to us for consideration
- Security forms
- Supplier questionnaires
- Yearly update forms at appraisal/feedback sessions
- From a partner or friend if you are nominated to receive 'death in service' benefits or advised as 'next of kin'

If you choose not to give us personal information:

- This may delay or hinder us from meeting our statutory obligations
- It may mean that we are unable to process your application for employment or partnership with us

With whom we share or may share your personal information (as appropriate for business, security and legal uses):

- Joint data controllers including a third party company that offers support services to MSL to administer our suppliers' and employees' contracts and payments
- Providers of accountancy services who administer our payroll and other financial services
- Our banking service providers in order to make payments
- Companies who supply MSL with contractual advice for employment
- List X companies, that manage security clearances
- MoD security personnel, who issue passes and permits
- Providers of wealth management services / pension advice
- Various insurance companies which administer our Death-in-Service policy
- The insurance society which administers our company pension
- Third party organisations who require information for statutory or legal reasons, for instance, Police Forces, HMRC, FCA, other regulatory bodies
- Third party organisations with whom we work (an example might be a partner company which may request names and details for a company visit or conference)
- Training organisations when booking courses
- Customers who request the CV or security details of our workers
- Other companies (chosen at board level) to support our business ventures

Location

- GDPR regulations apply within the EEA from 25 May 2018. We will only share your personal information outside of the European Economic Area (EEA) to follow your instructions, comply with a legal requirement, or if we work with other, approved third-party organisations.

How long we keep your information:

- We will keep your information only for as long as is required for legal, regulatory or technical reasons
- We may need to keep your information for up to 8 years for one of the above reasons; responding to questions or complaints; to show MSL used fair treatment; maintaining records for regulatory reasons
- We may need to keep information for longer than 8 years for regulatory reasons

Your rights

You have the right to request a copy of any personal information we hold on you (known as making a 'subject access request'), as well as why we have that information, where we collected that information and who has access to that information, at any time. Requests should be made in writing or by email to a company director, excepting adjustments under the Equality Act 2010. Please visit www.musketeersolutions.com for details of contact addresses.

Once we have received your request we will respond within 28 days.

Updating your personal information

You may question any information we hold on you that you think may be inaccurate or incomplete. If you do, we will take reasonable steps to check its accuracy and correct it, if necessary.

If you want us to stop using your personal information

You have the right to object to our use of your personal information, or to ask us to delete, remove or stop using that personal information if there is no need for us to keep it. These rights are known as the 'right to object' and the 'right to be forgotten'. Please note that the above rights are not absolute and we may be entitled to refuse requests where exceptions apply.

We may agree to restrict or suspend the use of your personal information if there is a need for us to keep it for legal or contractual obligations. This could occur if you found that the information was/is:

- not accurate
- has been used unlawfully but you don't wish us to delete it
- no longer relevant but you wish us to keep it for use in legal claims
- already under consideration for removal but we are awaiting advice to confirm whether our use of the personal information is lawful

If you request MSL to delete your personal information we will confirm whether the information has been deleted or tell you the reason why it may not be deleted.

Copies of your personal information

If you request a copy of your personal information this will be made available to you in a format which is easily usable and portable. You may, also, request us to pass your personal details to another organisation; please contact us if this is required.

Your right to complain

If you are not satisfied with our response or if you feel that we are not processing your personal information in accordance with the law please speak to a company director. If you wish to complain you can contact the Information Commissioner's Office (ICO) by emailing casework@ico.org.uk or telephoning 0303 123 1113 or text-phonning 01625 545860. Additional services are detailed on their website: <https://ico.org.uk/global/contact-us>