

GDPR – Data Protection Policy 2026

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1. Overview

This privacy policy applies to all colleagues (current and former), workers and contractors; and provides a summary of how we collect and use personal information about you during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR).

Advanté as a “data controller”, is committed to protecting the privacy and security of your personal information.

If you would like more detailed information regarding your rights under GDPR, please use the following website: www.gov.uk/data-protection

2. Data protection principles

We will comply with data protection law, which says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept securely, only as long as necessary for the purposes we have told you about.

As well as collecting personal information from you, we may also request relevant information from third parties including former employers, credit reference agencies etc.

3. The kind of information we hold about you

Personal data means any information about you from which you can be identified. It does not include data where the identity has been removed (anonymous data). Some examples of personal data include:-

- Personal contact details
- Date of birth
- Next of kin and emergency contact information
- Bank account details
- Employment details such as salary, benefits etc
- Right to Work in the UK
- Relevant certificates, licences etc required for your role
- Employment records (disciplinary, performance etc)
- Use of company systems and resources

There are certain types of more sensitive personal data, which requires a higher level of protection. Examples of sensitive personal data include:-

- Trade Union membership
- Information relating to your health, such as medical records, disability etc.
- Criminal convictions - we may only use information relating to criminal convictions where the law allows us to.

4. Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

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If you do not provide certain information when requested, or keep us informed of any changes, 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 people).

5. How we 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:

- Where we need to perform the contract we have entered into with you, for example paying your salary and making statutory deductions.
- Where we need to comply with a legal obligation, for example checking that you are legally entitled to work in the UK.
- Where we need to contact you in the case of an emergency and/or sharing important business information with you.
- Where it is necessary for a legitimate interest pursued by us or a third party and where your interests and fundamental rights do not override those interests.
- Management of the employee relationship and business planning.
- To monitor your use of our information and communication systems to ensure compliance with our IT policies and to ensure network and information security.
- Equal opportunities monitoring.

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. 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 some of your personal information without your knowledge or consent where this is required or permitted by law.

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:

- In limited circumstances, with your explicit written consent.
- Where we need to carry out our legal obligations or exercise rights in connection with your employment.
- Where it is needed in the public interest, such as for equal opportunities monitoring, tax or pension purposes.

8. Automated decision-making

We do not envisage that any decisions will be taken about you solely using automated means, however we will notify you if this position changes.

9. Data sharing

We may have to share your data with third parties, including third-party service providers and other companies in the Modulaire Group. Third parties must respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

We will 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 reason for doing so. 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.

10. Data retention – How long will you use my information for?

We will only keep your personal information for as long as necessary, including for the purposes of satisfying any legal, accounting, or reporting requirements.

11. Your rights in connection with personal information

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

- **Request access** to your personal information (commonly known as a "data subject access request").
- **Request correction** of the personal information that we hold about you.
- **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.
- **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.
- **Request the transfer** of your personal information to another party.

If you would like to exercise one or more of your rights, please contact privacyquestions@modulairegroup.com

REMEMBER: If you would like more detailed information regarding your rights under GDPR, please use the following website: www.gov.uk/data-protection

This policy has been approved and authorised by:

Signature:



Name: Darren Palmer

Position: Managing Director