

# Privacy Policy for the UK/EEA

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We take your privacy very seriously. Please read this privacy notice carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to applicable data protection law. Please note that this notice only applies to our processing of personal data if you are located in the UK and/or European Economic Area (“EEA”). If this notice conflicts with other policies or terms, this notice prevails over such policies or terms.

## Key terms

It would be helpful to start by explaining some key terms used in this notice:

We, us, our	SCSK Corporation
Personal data	Any information relating to an identified or identifiable individual
Special category personal data	Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership genetic and biometric data, data concerning health, sex life or sexual orientation

## Personal data we collect about you

We may collect and use the following personal data about you:

- your name and contact information, including email address and telephone number and company details
- your job title
- details of our interactions and correspondence
- Information about how you use our website, and other systems

This personal data may be required to provide services. Any personal data that is mandatory to provide is indicated in the relevant forms that you complete. If you do not provide personal data that is mandatory, it may delay or prevent us from providing services.

### **How your personal data is collected**

We collect most of this personal data directly from you—in person, by telephone, or email and/or via our website. However, we may also collect information:

- directly from a third party, e.g.:
  - your employer;
  - credit reference agencies; or
  - customer due diligence providers.
- via our IT systems, e.g.:
  - door entry systems ; and
  - automated monitoring of our websites and other technical systems, such as our computer networks and connections, and access control systems, communications systems, email and instant messaging systems.

### **How and why we use your personal data**

Under data protection law, we can only use your personal data if we have a proper reason for doing so, e.g.:

- to comply with our legal and regulatory obligations;
- for the performance of our contract or to take steps before entering into a contract;
- for our legitimate interests or those of a third party; or
- where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal data for and our reasons for doing so:

What we use your personal data for	Our reasons
To provide services to you	For the performance of our contract or to take steps before entering into a contract
To prevent and detect fraud	For our legitimate interests or those of a third party, i.e. to minimise fraud that could be damaging
Conducting checks to identify our customers and verify their identity	<p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, i.e. to ensure compliance with local laws</p>
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	<p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, i.e. to ensure compliance with local laws</p>
Ensuring business policies are adhered to, e.g. policies covering security and internet use	For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price
Ensuring the confidentiality of commercially sensitive information	<p>For our legitimate interests or those of a third party, i.e. to protect trade secrets and other commercially valuable information</p> <p>To comply with our legal and regulatory obligations</p>
Statistical analysis to help us manage our business, e.g. in relation to our financial	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service at the best price

performance, customer base, product range or other efficiency measures	
Preventing unauthorised access and modifications to systems	<p>For our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging</p> <p>To comply with our legal and regulatory obligations</p>
Updating and enhancing customer records	<p>For the performance of our contract or to take steps before entering into a contract</p> <p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our customers</p>
Ensuring safe working practices, staff administration and assessments	<p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you</p>
<p>Marketing our services to:</p> <ul style="list-style-type: none"> <li>—existing and former customers;</li> <li>—third parties who have previously expressed an interest in our services;</li> <li>—third parties with whom we have had no previous dealings.</li> </ul>	<p>For our legitimate interests or those of a third party, i.e. to promote our business to existing and former customers</p> <p>Where you have given consent (if required by law)</p>
Credit reference checks via external credit reference agencies	<p>For our legitimate interests or those of a third party, i.e. to ensure our customers are likely to be able to pay for our products and services</p>

<p>External audits and quality checks, e.g. for ISO or Investors in People accreditation and the audit of our accounts</p>	<p>For our legitimate interests or a those of a third party, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards</p> <p>To comply with our legal and regulatory obligations</p>
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### **Who we share your personal data with**

We routinely share personal data with:

- companies within the SCSK group;
- third parties we use to help deliver our services;
- other third parties we use to help us run our business, e.g. marketing agencies or website hosts;
- credit reference agencies;
- our insurers and brokers; and
- our bank/s.

We only allow our service providers to use your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on service providers relating to ensure they can only use your personal data to provide services to us and to you. We may also share personal data with external auditors, e.g. in relation to ISO or Investors in People accreditation and the audit of our accounts.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal data with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

### **Where your personal data is held**

Information may be held at our offices and those of our group companies, third party agencies, service providers, representatives and agents as described above (see above: '**Who we share your**

**personal data with').**

Some of these third parties may be based outside the European Economic Area and the United Kingdom. For more information, including on how we safeguard your personal data when this occurs, see below: '**Transferring your personal data out of the UK and EEA**'.

### **How long your personal data will be kept**

We will keep your personal data while you have an account with us or we are providing services to your employer (or are otherwise dealing with your employer). Thereafter, we will keep your personal data for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly;
- to keep records required by law

We will not retain your personal data for longer than necessary for the purposes set out in this notice. Different retention periods apply for different types of personal data.

### **Transferring your personal data out of the UK and EEA**

We share your personal data within the SCSK Group. This will involve transferring your data outside the EEA (for EEA data) or the UK (for UK data).

Whenever we transfer your personal data out of the EEA or the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission (or, in relation to UK data, countries that are deemed by the relevant authorities to provide an adequate level of protection for personal data).
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe (or, in relation to the UK, contracts approved for use in the UK).

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA or the UK or the way to get a copy of specific contracts approved by the European Commission or the relevant authorities.

### Further information

If you would like further information about data transferred outside the UK or EEA, please contact us (see 'How to contact us' below).

### Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal data (the right of access)
Rectification	The right to require us to correct any mistakes in your personal data
To be forgotten	The right to require us to delete your personal data—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal data—in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object:  —at any time to your personal data being processed for direct marketing (including profiling);  —in certain other situations to our continued processing of your personal data, eg processing carried out for the purpose of our legitimate interests.

Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you. Please note that we do not plan to make such a decisions by using your personal information.
To withdraw consent	You have the right to withdraw your consent whenever we handle your personal information based on your consent under applicable laws and regulations. Even if you withdraw your consent, the legality of any treatment on the basis of consent before the withdrawal of consent will not be affected.
To file a complaint with a supervisory authority	You may have the right to file a complaint with a supervisory authority under applicable laws and regulations. The supervisory authorities to which complaints can be filed may include the supervisory authorities where you reside or work.

For further information on each of those rights, including the circumstances in which they apply, please contact us.

If you would like to exercise any of those rights, please:

- email, call or write to us—see below: ‘How to contact us’; and
- let us have enough information to identify you;
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know what right you want to exercise and the information to which your request relates.

### **Keeping your personal data secure**

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

### **How to complain**

We hope that we can resolve any query or concern you may raise about our use of your information. If you have any queries or concerns regarding your personal data, please contact us - see 'How to contact us' below. If you feel that we have not used your data correctly, or if you are unhappy with the way that we have responded to a request you have made you have the right to lodge a complaint with a local supervisory authority in your country of residence.

### **Changes to this privacy notice**

This privacy notice was published on 04/06/2026.

We may change this privacy notice from time to time—when we do we will inform you via our website.

### **How to contact us**

Please contact us at [Inquiry Form] if you have any questions about this privacy notice or the information we hold about you

#### **SCSK Corporation Personal Information Inquiry Counter**

Toyosu Front, 3-2-20 Toyosu, Koto-ku, Tokyo 135-8110

- [Inquiry Form](#)