

# Board Members Privacy Notice

The Sovini Group is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 with effect from 25<sup>th</sup> May 2018.

The Sovini Group consists of a number of different legal entities which includes Sovini Limited and a number of Group Members. Further information about our Group Members can be found here: <a href="https://sovini.co.uk/our-group-members/">https://sovini.co.uk/our-group-members/</a>. For simplicity throughout this notice, 'we' and 'us' means the Sovini Group.

# Data protection principles

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

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

# How we use Board Member information

The categories of employee information that we collect, process, hold and share include:

- Personal information (such as name, employee number, address, national insurance number)
- Special categories of data including characteristics information such as gender, age, ethnic group
- Contract information (such as start dates, attendance, role(s) and remuneration information)
- Attendance/absence information (such as number of absences and reasons)
- Qualifications and employments details
- Medical information
- Details required for Statutory Registers (Companies House/FCA Registration/Charities Commission)

# Why we collect and use this information

We use this data to:

- Enable the development of a comprehensive picture of Board Membership and how it is deployed
- Ensure the continued development of recruitment policies/processes
- Enable individuals to receive remuneration and for the Sovini Group to fulfil all other obligations under your contract
- Financial management of the Sovini Group
- Meet Legal and Statutory requirements

# Lawful bases for processing of your data

The lawful bases for which we will process your data are:

- Where processing is necessary for the performance of the contract(s) to which you are party.
- Where processing is in our legitimate interests or that of a third-party
- Where processing is in your vital interests
- Where you have consented to such processing
- Where we are legally obliged to

### Who we share this information with

We routinely share your information with partner agencies - examples include:

- The Regulator
- Companies House
- FCA
- Consultants working on our behalf
- Payroll
- HMRC
- IT Services
- Auditors

#### Sensitive Personal Data

In certain circumstances sensitive personal data may be processed or shared with third parties.

Other sensitive data may also be processed internally for the purpose of monitoring equality within the organization.

#### Website Profile

Your website profile (which contains your photograph) is also included on our website under the 'Meet the Board' section, but we will consult you on that in advance of it being included, and profiles are

removed when someone steps down from the Board. The profile may also be shared with candidates being interviewed if you are an Interview Panel Member.

### 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"). 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.

**Right to raise a complaint** about the handling of your personal data if you believe there has been an infringement of UK GDPR or data protection legislation. An acknowledgement of receipt will be provided within 30 days.

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.

#### Changes to the Privacy Notice and your duty to inform us of changes

We keep our Privacy Notice under regular review. This version was last updated in October 2025. Historic versions can be obtained by contacting us.

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

# Data protection officer

We have appointed a data protection officer (DPO), Data Protection People, to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO on;

Email address: <a href="mailto:dpenquiries@sovini.co.uk">dpenquiries@sovini.co.uk</a>

Telephone number: 0151 529 7027

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.