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Document Title	Occam Group Customer Privacy Policy
Reference No.	1034D
Issue No.	1.0
Date	05/11/2026
Originator	Occam Group
Project	Information Security Management System
Customer	Occam Group
Classification	COMMERCIAL-IN-CONFIDENCE
Author	Charles Brooking
Approver	James Hosken
Owner	Data Protection Officer
Copyright	Occam Group Ltd.

Issue Number	Section Title/ Revision Description	Author	Approver	Date Approved
1	Initial issue.	Charles Brooking	James Hosken	05/11/2026

1. INTRODUCTION

1.1 WHO WE ARE

1 Occam Group Ltd (company number 11986732, whose registered office is at One New St, Wells, Somerset, BA5 2LA) ("we", "us", "our") collects, uses and is responsible for certain personal information about you. When we do so, we are subject to the Data Protection Act 2018, and the UK General Data Protection Regulation ("Data Protection Law"). s

2 For the purposes of Data Protection Law, we are a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. Occam Group Ltd is registered with the UK Information Commissioner's Office under registration number ZA699702.

1.2 PURPOSE

3 This privacy policy describes how we gather, use and protect personal information about customers during the conduct of business.

4 Please read this Privacy Statement carefully as it contains important information to help you understand how and why we process any personal information that you give to us.

1.3 TERMINOLOGY USED IN THIS POLICY

5 When we refer to "personal information" in this Policy, we mean any information about an individual which can be used to identify that individual.

6 When we refer to "special category" personal information in this Policy, we mean types of personal information which require a higher level of protection. This includes information about your health, such as the disability information described in section 2.1.

2. POLICY CONTROLS

2.1 WHAT INFORMATION WE GATHER

7 We may gather the following personal information:

- Personal contact details (name, title, telephone numbers, address, email addresses).
- Date of birth.
- Gender.
- Security Clearances.
- Nationality.
- Employment and education history.

8 We may also collect, store and use the following special category personal information:

- Whether or not you have a disability for which we need to make reasonable adjustments when fulfilling contract obligations, and if so, the nature of that disability to the extent required to make such reasonable adjustments.

2.2 HOW INFORMATION IS GATHERED

9 Information is collected:

- Directly from you.

- From your stakeholders.

2.3 HOW WE USE YOUR INFORMATION

10 We use this information:

- Where necessary for our legitimate interests in fulfilling our contractual obligations to customer organisations, or in dealing with queries, complaints or claims; provided those interests are not overridden by your interests or fundamental rights and freedoms.
- To comply with legal requirements.

11 We will only collect and use personal information in line with our responsibilities under applicable Data Protection laws.

2.4 HOW WE USE SPECIAL CATEGORY PERSONAL INFORMATION

12 We process special category personal information where we need to carry out our legal obligations, or, less commonly, we may process this type of data where it is needed in relation to legal claims.

13 Situations in which we may process your special category personal information are listed below:

- To ensure we comply with your statutory rights.

2.5 WHO WE SHARE YOUR PERSONAL INFORMATION WITH

14 We may share your personal information internally within the company in order to fulfil contract obligations and/or make reasonable adjustments for you. Those adjustments support the fulfilment of contract obligations.

15 We will only disclose your personal information to third parties when the law allows us to do so. These may include, but are not limited to:

- External organisations for the purposes of obtaining or checking security clearance.
- Other third parties where it is necessary in order fulfil contract obligations, in order to comply with a legal obligation, or where it is necessary for our interests (or those of a third party).

2.6 PROTECTING YOUR INFORMATION

16 Access to your information is restricted to those who have a business need to know.

17 Any personal information we hold about you is stored and processed in accordance with the UK General Data Protection Regulation (GDPR). As such we have put in place appropriate security measures to prevent your personal information from being used or accessed unlawfully or accidentally lost.

18 In the event that we become aware of an actual or suspected data security breach, we will promptly take all necessary steps to address such breach and notify you accordingly if your personal information has been affected.

2.7 HOW LONG YOUR PERSONAL INFORMATION WILL BE KEPT

19 We will hold limited personal data associated with customers so as to enable records of communications and delivery of professional services to be demonstrated in accordance with contractual or insurance requirements, or for lengths of time stipulated by relevant Regulatory bodies.

20 Personal information which is no longer retained will be securely and effectively destroyed or permanently erased from our IT systems.

2.8 YOUR RIGHTS & RESPONSIBILITIES

21 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.

22 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 and there is something about your particular situation which makes you want to object to processing on this ground.
- 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.

23 If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal information, or request that we transfer a copy of your personal information to another party, please contact us using the following email address: info@occam-group.co.uk.

24 For more information about your rights, you may wish to look at the Information Commissioners Office website www.ico.org.uk. In the event you have a complaint relating to our handling of your personal information, you also have the right to lodge a complaint with us or the Information Commissioner. Please send complaints using the following email address: info@occam-group.co.uk.

25 You will not normally 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.

26 We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

2.9 RIGHT TO WITHDRAW CONSENT

27 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 us. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

28 Withdrawing your consent may impact our ability to continue supporting you.

3. HOW TO CONTACT US

29 If you have any questions about this policy or how we handle your personal information, please contact us using the following email address: info@occam-group.co.uk.

4. CHANGES TO THIS POLICY

30 We reserve the right to update this Policy at any time. We will upload a new policy when we make any substantial updates.