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Author	Charles Brooking
Approver	James Hosken
Owner	Data Protection Officer
Copyright	Occam Group Ltd.

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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 suppliers 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.
- Bank account details.
- Security Clearances.
- Nationality.
- Employment and education history.
- References.
- Copies of right to work documentation.

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 throughout the supplier onboarding process and/or during tasks, and if

so, the nature of that disability to the extent required to make such reasonable adjustments.

- Criminal convictions and offences. Please see below for further information about our collection and use of such information.

2.2 HOW INFORMATION IS GATHERED

9 Information is collected:

- Directly from you.
- From suppliers and service providers.
- From referees.

2.3 HOW WE USE YOUR INFORMATION

10 We use this information:

- Where necessary for our legitimate interests in the operation of customer accounts (including submitting proposals and fulfilling 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 exercise rights in connection with sub-contracting, 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.
- To assess your suitability for sub-contracting.
- We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work.
- We may use your special categories of personal information, and any information about any criminal convictions and offences, where it is needed to establish, exercise or defend legal claims.

2.5 INFORMATION ABOUT CRIMINAL CONVICTIONS

14 Owing to our involvement in work pertaining to national security, we are required by the Cabinet Office's "Baseline Personnel Security Standard" to carry out criminal record checks using the Disclosure and Barring Service ("DBS") (or "Disclosure Scotland" in Scotland). This is a legal requirement for us under the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended). We utilise a third party to conduct these checks on our behalf.

15 Whilst it is true that not all our employees and workers will be involved in work relating to national security, the fact that we operate in an open office environment means that employees and workers could find themselves working alongside individuals that are,

and on this basis, we have taken the view that we have a legitimate business interest in carrying out criminal record checks for all job applicants.

16 We only hold such information for such time as is necessary in order to complete the required checks, thereafter, it is deleted.

2.6 WHO WE SHARE YOUR PERSONAL INFORMATION WITH

17 We may share your personal information internally within the company in order to progress supplier onboarding and tasking.

18 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 conducting reference and background checks.
- External organisations for the purposes of obtaining or checking security clearance.
- Former employers or other referees in order to collect references.
- Regulators to ensure compliance with the law.
- Other third parties where it is necessary in order to enter into a contract with you, fulfil obligations of such a contract, in order to comply with a legal obligation, or where it is necessary for our interests (or those of a third party).

2.7 PROTECTING YOUR INFORMATION

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

20 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.

21 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.

2.8 HOW LONG YOUR PERSONAL INFORMATION WILL BE KEPT

22 We will hold personal data associated with suppliers of professional services until instructed to delete the data by the supplier, or when subject to review it is determined we no longer have a legitimate interest in holding the data.

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

2.9 YOUR RIGHTS & RESPONSIBILITIES

24 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.

25 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.

26 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.

27 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.

28 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.

29 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.

2.10 RIGHT TO WITHDRAW CONSENT

30 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.

31 Withdrawing your consent may impact your ability to continue supporting Occam Group.

3. HOW TO CONTACT US

32 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

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