



Introduction

This Data Protection policy (the “**Policy**”) governs the collection, use, disclosure, transfer and storage of Personal Data by The One-Shot Corporation Limited, and its affiliates (together “**One-Shot**”) as Controllers of Personal Data. For further details of the applicable One-Shot affiliate processing Personal Data of Data Subjects and as a Controller (where applicable), please see Schedule 1 to this Policy.

This Policy includes the following policies that set out One Shot’s approach to the processing of Personal Data:

the [Personal Data Incident Notification Policy](#) in relation to the procedures to be followed in the event of an incident relating to Personal Data;

the [Data Transfers Policy](#) in relation to transfers of data to organisations outside of the European Economic Area (“**EEA**”);

the [Data Retention & Destruction Policy](#) in relation to the retention of data by One Shot; and

the [Privacy Policy](#) for users of One-Shot websites.

This Policy:

has been approved by the Directors of One Shot;

may be amended by One-Shot at any time, consistent with the requirements of applicable laws and regulations. Any revisions will take effect from the date on which the amended Policy is published, as indicated in the version number set out herein; and applies to all Colleagues.

Any breach of this Policy will be taken seriously and may result in disciplinary action.

Any questions or concerns about the operation of this Policy, including whether this Policy has been followed should be referred to the Directors of One-Shot – the responsible person is Gary McGill – privacy@one-shot.com

Where there are local requirements in respect of a particular jurisdiction, One Shot may state so and/or publish further policies.

Definitions

“Colleague” means any full, part-time or temporary employee or contractor of One-Shot;

“Data Subject” means any individual who is the subject of Personal Data that is processed by One-Shot;

“Data Protection Committee” means the data protection committee of One-Shot which includes the Director responsible for Data Protection who may be contacted at privacy@one-shot.com

“Data Protection Laws” means all applicable laws, rules, regulations, directives and governmental requirements relating in any way to the privacy, confidentiality, security, integrity and protection of Personal Data, including without limitation: (a) the UK Data Protection Act 2018,, the EU General Data Protection Regulation 2016/679, the EU ePrivacy Directive 2002/58/EC as amended by Directive 2009/136/EC, each as amended or superseded from time to time, and any EU Member State national implementing legislation; (b) applicable laws regulating unsolicited telephone calls, email, text/SMS or other electronic or anti-spam legislation; (c) applicable laws relating to data breach notification; (d) applicable laws imposing minimum security requirements; (e) applicable laws requiring the secure disposal of records containing Personal Data; and (f) applicable laws regulating cross-border data transfers of Personal Data;

“Data Protection Representative” means an appointed person responsible for data protection matters for One-Shot;

“Personal Data” means any data relating to an identified or identifiable person. An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to that person’s physical, physiological, genetic, mental, economic, cultural, or social identity. Examples of information that may permit this kind of identification include without limitation addresses, email addresses, telephone numbers, dates of birth, identity card numbers, human resources files about employees, details of clients and suppliers;

“process” or **“processing”** or **“processed”** means any operation or set of operations performed upon Personal Data, whether or not by automatic means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction;

“Sensitive Personal Data” means any data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic or biometric data, data concerning health, data concerning sex life or sexual orientation, and data concerning the commission or alleged commission of any offence.*

2.2 Words denoting the singular shall include the plural and vice versa.

3. Process for data protection queries

- a) If there are data protection queries, please follow the following process:

b) in the first instance, consult this Policy and/or the other policies mentioned in Section 1.2;

if the query cannot be resolved as above, please contact privacy@one-shot.com

4 Collection and Use of Personal Data

4.1 One Shot collects Personal Data relating to:

- a) applicants for employment, full, part-time and temporary employees (“**Employee Personal Data**”);
- b) applicants for full, part-time and temporary employment and contractors (“**Contractor Personal Data**”);
- c) clients (“**Client Personal Data**”);
- d) suppliers and other persons who provide goods and/or services to One Shot (“**Supplier Personal Data**”); and
- e) users of our websites or other related services provided by One Shot (“**User Personal Data**”).

4.2 Employee Personal Data

- a) One Shot may hold and process the following types of Employee Personal Data
 - I. personal details: name, address and contact information, national identity/registry/insurance numbers, date of birth, gender, immigration status and eligibility to work;
 - II. family composition: names of spouses and/or dependents and emergency contact details;
 - III. employment details: CVs, recruitment details and application forms, job history and experience, references, qualifications, appraisals and performance ratings, promotions/demotions, training records, information related to an employment contract, working time records and records relating to holiday and other leave, disciplinary actions, investigations or grievances, and workplace accidents;
 - IV. education and vocational training, language, and other job-related skills;
 - V. medical and fitness details;
 - VI. financial details, including salary, bonuses, expense reimbursement and benefit information, bank account numbers, pensions, and details of any company loans, contractual payment and entitlements; and
 - VII. photographs of individuals.
- b) The processing of Employee Personal Data enables One Shot to perform its role as an employer and/or agent, including fulfilling its legal obligations under applicable laws and as necessary in connection with the performance of employment contracts. Without this information it would not be possible for One Shot to perform a worker’s employment contract. Certain Employee Personal Data is processed by One Shot for its legitimate business interests, including without limitation:
 - I. administration and management of its employees;
 - II. administration of employee benefits and entitlements;
 - III. recruitment and determining suitability for employment or promotion;
 - IV. conducting employee appraisals and performance evaluations;
 - V. administering payroll services and other benefits, including pay, allowances, pension, health and life insurance, and other benefits, taxation, and other deductions from pay;

- VI. ensuring employee health and safety, monitoring attendance, and determining physical and/or mental fitness to work;
- VII. disciplining and investigating suspected misconduct or non-performance of duties;
- VIII. responding to grievances and terminating employment;
- IX. training;
- X. ensuring legal and regulatory compliance, including monitoring compliance with internal rules and policies;
- XI. data backup, data archive and document retention; and
- XII. risk management, legal, accounting, and audit functions.

c) One-Shot may disclose and/or transfer Employee Personal Data within One Shot or to third parties for the purposes set out above. The parties to whom One Shot may disclose or otherwise transfer Employee Personal Data include:

- I. One-Shot's affiliates for purposes consistent with their legitimate business practices and this Policy;
- II. business associates and other professional advisors;
- III. third party service providers or processors performing services on One Shot's behalf or providing products, such as:
 - a) human resources functions and other business processes, including without limitation recruitment, payroll, employee benefits, and insurance;
 - b) operation and maintenance and hosting of information systems;
 - c) risk management, compliance, legal and audit functions, and/or support services;
 - d) data backup and archive; and/or
 - e) insurers;

(iv) to an investigative body in the case of a breach of an agreement or a contravention of law;

(v) as otherwise necessary, required or permitted by law or due to a request from a competent court, regulator or other authority; and

(vi) any prospective third-party purchaser of the shares or assets of One Shot.

d) One-Shot may also hold and process the following types of Sensitive Personal. Data in relation to employees:

- I. racial or ethnic origin only where required for the purposes of compliance with anti-discrimination laws;
- II. religious beliefs, sexual life, sexual orientation and gender reassignment where required by law;
- III. health data where required by law and/or relating to benefits, accommodation of disabilities, leave entitlement, statutory sick pay, and/or health and safety at work;
- IV. trade union memberships data where required by law if applicable; and
- V. criminal background data where such checks are required by law.

e) One Shot will only process such Sensitive Personal Data when permitted or required to comply with its legal obligations or where the employee's explicit consent has been obtained for the processing of such data (where such consent may be required by local law) or where necessary to protect the individual's vital interests.

4.3 Contractor Personal Data

(a) One Shot may hold and process the following types of Contractor Personal Data:

- (i)** personal details, such as information which may identify contractor: name, address of work place, work contact information;
- (ii)** details, such as information relating to the use of a contractor: job title/function and area of expertise;
- (iii)** financial details, such as any financial information required for the performance of a contract with any contractors who may be individuals: bank account details for purposes of invoicing, payments and the performance of the contract;
- (iv)** medical and fitness details;
- (v)** goods or services provided, including any information relating to goods
and services that have been supplied by any contractors; and
- (vi)** photographs of individuals.

(b) The processing of Contractor Personal Data enables One Shot to carry out its legal obligations in connection with the performance of its agreement with contractors. Without this information it would not be possible for One Shot to perform its contractual obligations. Certain Contractor Personal Data is processed by One Shot for its legitimate business interests, including without limitation:

(I) keeping records relating to the business and activities carried out between One Shot and any contractors, including records of:

- (A)** accounts and business records;
- (B)** risk management, compliance, legal and audit functions; and/or
- (C)** financial reporting;

(ii) carrying out background checks for anti-money laundering compliance or for the purposes of financial sanctions screening where required by law; and

(iii) general processing relating to any goods and/or services provided and the performance of contracts with any contractors.

(c) One-Shot may disclose and/or transfer Contractor Personal Data within One Shot or to third parties only for the business-related purposes set out above. The parties to whom One Shot may disclose or otherwise transfer Contractor Personal Data include:

- (i)** One-Shot and its affiliates for purposes consistent with their legitimate business practices and this Policy;
- (ii)** employees and business associates;

- (iii) third party processors utilised for risk management, compliance, legal and audit functions;
- (iv) legal and other professional advisers, consultants and experts;
- (v) financial organisations and advisers;
- (vi) insurers;
- (vii) persons making an enquiry or complaint, where required by law and/or with consent;
- (viii) to an investigative body in the case of a breach of an agreement or a contravention of law;
- (ix) as otherwise necessary or required or permitted by law or due to a request from a competent court, regulator or other authority; and
- (x) any prospective third-party purchaser of the shares or assets of One Shot.

(d) One Shot may also hold and process the following types of Sensitive Personal

Data in relation to contractors:

criminal background data only in relation to compliance with anti- corruption and/or anti-bribery where such checks are required by law.

(e) One-Shot will only process such Sensitive Personal Data when permitted or required to comply with its legal obligations or where the contractor's explicit consent has been obtained for the processing of such data, where such consent may be required by local law.

4.4 Client Personal Data

(a) One-Shot may hold and process the following types of Client Personal Data:

- (i) personal details: client name, client business postal address, client business email address, client business telephone number, client personal mobile number;
- (ii) financial details: any financial information required for the performance of a contract with clients, in particular, bank account details for purposes of invoicing, payments and the performance of the client contract;
- (iii) goods or services provided by the One Shot to the client;
- (iv) records of telephone conversations; and
- (v) photographs of individuals.

(b) The processing of Client Personal Data enables One-Shot to perform its role as service provider, including carrying out its obligations in connection with the performance of its client contracts. Without this information it would not be possible for One-Shot to perform a client contract. Certain

Client Personal Data is processed by One-Shot for its legitimate business interests, including without limitation:

(i) keeping records relating to the business and activities carried out by the One Shot with its clients, including records of:

(A) general processing relating to the performance of contracts with, and provision of services and/or products to, clients; and

(B) client relationship management, including advertising, marketing and public relations;

(ii) carrying out background checks for anti-corruption/anti-bribery compliance or for anti-money laundering compliance or financial sanctions screening where required by law and credit worthiness; and

(iii) financial records and audits related to client contracts and relationships.

(c) One-Shot may disclose and/or transfer Client Personal Data within One-Shot or to third parties only for the business-related purposes set out above. The parties to whom One-Shot may disclose or otherwise transfer Client Personal Data include:

(i) One-Shot and its affiliates for purposes consistent with their legitimate business practices and this Policy;

(ii) employees and business associates;

(iii) third party processors utilised for risk management, compliance, legal and audit functions;

(iv) legal and other professional advisers, consultants and experts;

(v) financial organisations and advisers;

(vi) insurers;

(vii) persons making an enquiry or complaint, where required by law and/or with consent;

(viii) to an investigative body in the case of a breach of an agreement or a contravention of law;

(ix) as otherwise necessary or required or permitted by law or due to a request from a competent court, regulator or other authority; and

(x) any prospective third-party purchaser of the shares or assets of One Shot.

(d) One-Shot may also hold and process the following types of Sensitive Personal

Data in relation to clients:

criminal background data only in relation to compliance with anti- corruption and/or anti-bribery where such checks are required by law.

(e) One-Shot will only process such Sensitive Personal Data when permitted or required to comply with its legal obligations or where the client's explicit consent has been obtained for the processing of such data, where such consent may be required by local law.

4.5 Supplier Personal Data

(a) One-Shot may hold and process the following types of Supplier Personal Data:

(i) personal details: name/contact;

(ii) employment details: work address, work contact information, job title or function;

(iii) financial details, such as any financial information required for the performance of a contract with suppliers who may be individuals: bank account details for purposes of payment or expense reimbursement, invoices for services rendered, payment for goods supplied;

(iv) goods or services provided, including any information relating to goods and services that have been supplied by suppliers; and

(v) photographs of individuals.

(b) The processing of Supplier Personal Data enables One-Shot to perform its obligations in connection with the performance of its contracts with suppliers. Without this information it would not be possible for One-Shot to perform a supplier contract. Certain Supplier Personal Data is processed by One-Shot for its legitimate business interests, including without limitation:

keeping records relating to the business and activities carried out between the One Shot and any suppliers, including records of:

(A) accounts and business records;

(B) risk management, compliance, legal and audit functions; and

(C) financial reporting;

(ii) carrying out background checks for anti-money laundering compliance or for the purposes of financial sanctions screening where required by law; and

(iii) general processing relating to any goods and/or services provided and the performance of contracts with any suppliers.

(c) One-Shot may disclose and/or transfer Supplier Personal Data within One-Shot or to third parties only for the business-related purposes set out above. The parties to whom One-Shot may disclose or otherwise transfer Supplier Personal Data include:

(i) One-Shot and its affiliates for purposes consistent with their legitimate business practices and this Policy;

(ii) employees and business associates;

(iii) third party processors utilised for risk management, compliance, legal
and audit functions;

(iv) legal and other professional advisers, consultants and experts;

(v) financial organisations and advisers;

(vi) insurers;

(vii) persons making an enquiry or complaint, where required by law and/or with consent;

(viii) to an investigative body in the case of a breach of an agreement or a contravention of law;

(ix) as otherwise necessary or required or permitted by law or due to a request from a competent court, regulator or other authority; and

(x) any prospective third-party purchaser of the shares or assets of One Shot.

(d) One-Shot may also hold and process the following types of Sensitive Personal

Data in relation to suppliers:

criminal background data only in relation to compliance with anti- corruption and/or anti-bribery where such checks are required by law.

(e) One-Shot will only process such Sensitive Personal Data when permitted or required to comply with its legal obligations or where the supplier's explicit

consent has been obtained for the processing of such data, where such consent may be required by local law.

4.6 User Personal Data

One-Shot will hold and process User Personal Data in accordance with and as set out in the Privacy Policy.

5 PROCESSING OF PERSONAL DATA

One-Shot handles all Personal Data such that it is:

- (a) processed lawfully, fairly and in a transparent manner in relation to the Data Subjects;
- (b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes. Further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes will not be considered to be incompatible with the initial purposes;
- (c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- (d) accurate, where necessary, kept up to date and every reasonable step must be taken to ensure that Personal Data that is inaccurate is erased or rectified without delay;
- (e) kept in a form which permits identification of Data Subjects for no longer than is necessary for the purposes for which the Personal Data is processed; Personal Data may be stored for longer periods insofar as the Personal Data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate measures;
- (f) processed in a manner that ensures appropriate security of the Personal Data, including protection against unauthorised or unlawful processing, accidental loss, destruction or damage, using appropriate measures; and
- (g) only disclosed to third parties or transferred outside a country's or region's borders in accordance with Data Protection Laws and ensuring adequate levels of data protection.

6 RIGHTS OF DATA SUBJECTS

One-Shot will respond to requests made by Data Subjects to exercise their legal rights in relation to Personal Data that One Shot holds about them. Subject to any applicable exemptions, Data Subjects have the following rights:

(a) Right to be informed

Right to be informed about any Personal Data held about them by One Shot.

(b) Right of access

Right to request access to their Personal Data and be provided information in relation to that data (including the purposes for which the data is processed, how long it will be stored for, the right to lodge a complaint with a supervisory authority).

(c) Right to rectification

Right to have their inaccurate Personal Data amended.

(d) Right to erasure

Right to have their inaccurate Personal Data erased.

(e) Right to restrict processing

Right to restrict processing of their Personal Data.

(f) Right to data portability

Right to receive a copy of their Personal Data in a machine-readable format or

to have their Personal Data sent to another entity.

(g) Right to object

Right to object to the processing of their Personal Data.

(h) Right in relation to automated decision making and profiling

Right not to be subject to a decision which is based on automated processing or profiling that could result in a significant effect on the Data Subject, such as discriminatory effects.

SUBJECT ACCESS REQUESTS

7.1 If making a request to access your Personal Data please follow the instructions on the [Subject Access Request Form](#) and send the completed documents to privacy@one-shot.com

7.2 One-Shot shall handle subject access requests as follows:

(a) One-Shot shall identify the data subject;

(b) One-Shot shall provide the requested information within one month of receipt of request; this period may be extended by two further months where necessary, taking into account the complexity and number of the requests; One-Shot shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay;

(c) where the data subject makes the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by the data subject;

(d) where the request concerns a large quantity of information, One-Shot reserves the right to ask the data subject to specify the information the request relates to;

(e) if One Shot does not take action on the request of the data subject, One-Shot shall inform the data subject within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy; and

(f) One-Shot reserves the right to charge a reasonable fee for access or not to act on the request, where permitted by law.

8 APPOINTING DATA PROCESSORS

When appointing third parties to carry out processing of Personal Data on One-Shot's behalf, One Shot shall impose contractual obligations dealing with the protection and security of that information such that these third parties are contractually required to, amongst other obligations, act in a manner consistent with One Shot's instructions when processing Personal Data and that they have in place appropriate technical and organisational security measures to safeguard such Personal Data.

9 RECORD KEEPING

One-Shot maintains various records including the following:

- (a) processing activities carried out by One Shot;
- (b) consents provided by Data Subjects (where applicable); and
- (c) data protection related policies and procedures.

10 BREACH NOTIFICATION

One-Shot has in place the Personal Data Incident Notification Policy to be followed in the event of an incident and/or breach in relation to Personal Data.

11 INTERNATIONAL TRANSFERS OF PERSONAL DATA

Given the international nature of One-Shot's operations, Personal Data collected in the EEA may be transferred to countries outside the EEA which may not have laws offering the same level of protection for Personal Data as those inside the EEA. One-Shot will take steps to prevent the transfer of Personal Data without adequate safeguards being put in place and will ensure that Personal Data collected in the EEA and transferred internationally is afforded the same level of protection as it would be inside the EEA. For further information on the adequate safeguards adopted by One-Shot for the international transfer of Personal Data, please see the [Data Transfers Policy](#).

12 DATA RETENTION

One-Shot has in place the [Data Retention & Destruction Policy](#) to be followed in respect of the retention of Personal Data.

13 BREACHES OF THIS POLICY

Any actual or suspected breach of this Policy should be immediately notified to the Data Protection Committee by contacting privacy@one-shot.com

14 DOCUMENT CONTROL

15.1 Gary McGill is the owner of this Policy and is responsible for ensuring that this procedure is reviewed in line with the relevant review requirements.

15.2 This Policy was approved by the Directors of One Shot in September 2018 and is issued on a version-controlled basis.