

1. Introduction

This privacy notice describes how we collect and use personal information about you before, during and after your working relationship with us in accordance with the General Data Protection Regulation (GDPR). It applies to personnel that do not work for Marshall directly, but are working on a Marshall site collaboratively with Marshall staff Referred to as 'Marshall Partners' or 'you' in this document.

2. Responsibilities

- 2.1 The Data Privacy Manager is responsible for ensuring that this notice is made available to data subjects prior to Marshall collecting/processing their personal data.
- 2.2 All Employees/Staff of Marshall who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

3. Privacy notice

3.1 Who are we?

In the context of this Privacy Notice 'Marshall' refers to a group of different legal entities, details of which can be found in Appendix A below

This Privacy Notice is issued on behalf of the group of companies known as Marshall, so when we refer to 'Marshall', 'The Company', 'we', 'us' or 'our' in this Privacy Notice, we are referring to the relevant company responsible for processing your personal data.

The entity which will be the controller for your data is the entity with which you have entered into a contract of employment, consultancy, voluntary agreement or partnership.

Our Data Privacy Manager and Security can be contacted directly here:

- DataPrivacyManager@marshalladg.com (Marshall Data Privacy Manager)
- 01223 373206
- security.management@marshalladg.com (Marshall Security Department Rep)
- 01223 399438

3.2 Personal data types:

Personal data is any information that identifies a living individual such as name, an identifying number (e.g. National Insurance No, Clock No), location or physical characteristics associated to that individual. It can be an opinion of someone, or any information that when combined together identifies the person. In the context of this document this data will be referred to as ordinary.

Some personal data is classed as "special category data". This is data referring to race/ethnicity, religious beliefs, sexual orientation, political opinions, trade union membership, information about your health, genetic and biometric information and criminal records.

3.3 We may collect and process the following personal data about you:

Ordinary personal data

- Your Name, Address and contact details, including Email Address and telephone, Date and Place of Birth, National Insurance Number.
- Nationality, Immigration Status, 5 Year Personnel and Occupational History Details.
- Passport, Written Confirmation of current Employment.
- MoD Secrets and Confidentiality Declaration (this contains your Name & Signature)

Special category personal data

- Self-Criminal Record Declaration
- Criminal Record Check (if appropriate)
- 5 Year Personnel and Occupational History Details (which by its content elevates it to special category)

3.4 The personal data we collect will be used for the following purposes:

To formulate a Baseline Personnel Security Standard for pre-employment screening of Data Subjects to enter an MOD Approved Security Controlled site. This provides the UK Cabinet Office with a level of assurance to allow ongoing entrance to site.

Our legal basis for processing of the personal data is contractual. Marshall carry out work on behalf of the UK Government as part of an undertaking of these contracts all personnel on site must have been security cleared in accordance with:

- HMG Baseline Personnel Security Standard Version 5.0 – January 2018

3.5 Disclosure

Your information *may* be shared internally, including with members of Marshall Group, in Procurement and Logistics, ITAR and Trade Control, Airport, Security, Project, Facilities, Health and Safety and Compliance, Accounts and Finance Teams, managers in the business area in which you work and IT staff if access to the data is necessary for performance of the services.

We may share your data with the following third parties:

- Consultants supporting Projects and Tenders where relevant and applicable

- Contractors you will be working and interfacing with on Projects where relevant and applicable
- Relevant Government Departments and Agencies relating to law and regulations
- Health and Safety or Compliance providers
- Security – Cloud Booking
- Ministry of Defence (MoD) - clearances and access to MoD sites if required
- Marshall customers - access to customer sites if required
- Airport Security providers
- Airport Advisors - Civil Aviation Authority, NATS, EASA, FAA, GSAT advisors
- Archiving Services provider
- Auditors
- Legal advisors
- Professional advisors
- Marshall Group Holdings
- Our HR Solutions provider

3.6 Transferring personal data outside the EEA

All Countries within the European Union are covered by the GDPR, so your personal data will be handled and managed in exactly the same way as you would expect in the UK and can therefore be transferred without any other additional controls in place.

Your contact details will be held in Workday which is our HR Solutions provider this data is hosted in Ireland and the Netherlands

Other Countries considered to have adequate Data Protection laws in place are the additional countries included in the European Economic Area (Norway, Iceland & Liechtenstein) and the countries identified in the following link:-

https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en

In all other Countries where your personal data may be transferred the Company will ensure that appropriate measures are in place to protect it and will inform you of the transfer of data and the reasons why it is necessary.

If you require information on the Countries we currently transfer personal data to and the reasons for doing so please contact the GDPR Owner to discuss what safeguards have been put in place to protect your data.

3.7 Retention period

Marshall Security Department will process and store personal data for the duration of your engagement with Marshall plus 1 year.

3.8 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to ask for data that we hold about you that is inaccurate or incomplete to be corrected.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records. If there is no overriding legal reason to keep it.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing
- Right to object to automated processing, including profiling – You have the right to ask for certain important computer-made decisions (including profiling) to be challenged and to ask for a human to intervene.
(Please note that at this time no automated processing of Personal Identifiable Information (PII) is in operation.)
- In the event that Marshall refuses your request under rights of access, we will provide you with a reason as to why.

You have the right to complain as outlined in clause 3.10 below.

All of your rights identified above apply to any third party (as stated in 3.6 above) should they be involved in the processing of your personal data.

If you would like to exercise any of these rights, please contact the company Data Privacy Manager, Isobel Aylott, by emailing DataPrivacyManager@MarshallADG.com or by sending written correspondence to The Data Privacy Manager, Marshall, Airport House, Newmarket Rd, Cambridge, CB5 8RX.

You can make a subject access request by completing the organisation's Subject Access Request Form under the Privacy Notice Section on the [Company Internet](#)

3.9 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Marshall (or third parties as described in 3.6 above), or how your complaint has been handled, you have the right to lodge a complaint directly with Marshall's Data Privacy Manager, by emailing DataPrivacyManager@Marshalladg.com or by sending written correspondence to The Data Privacy Manager, using the contact details below.

If the complaint is not resolved to your satisfaction you have the right to lodge the complaint with the Supervisory Authority.

The details for each of these contacts are:

	Data Privacy Manager	Supervisory Authority
Contact Name:	Isobel Aylott	Information Commissioners Office (ICO)
Address line:	Marshall Group, Airport House, Newmarket Rd, Cambridge, CB5 8RX	Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF
Email:	DataPrivacyManager@Marshalladg.com	https://ico.org.uk/global/contact-us/email/
Telephone:	01223 373206	03031231113
Website		https://ico.org.uk/concerns/

The recommended method of communication to the ICO is via their website

Document Owner and Approval

The Data Privacy Manager is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all members of personnel who have access to Marshall sites under the Privacy Notice section on the [Company Internet](#)

Change History Record

Issue	Description of Change	Approval	Date of Issue
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1	Initial issue	Data Privacy Manager	07/06/18
1.1	Amendments to Internet links	Data Privacy Manager	07/03/19
1.11	Annual Review	Data Privacy Manager	19/06/19
1.12	Annual Review and minor typing amendment	Data Privacy Manager	01/07/21
1.13	Removal of Marshall ADG as the overarching umbrella definition of companies	Data Privacy Manager	08/09/21
1.14	Review to incorporate amendments as result of change of HR Solutions provider	Data Privacy Manager	16/11/21

APPENDIX A– Marshall Companies

Company Name	Company No.	Address
Marshall of Cambridge Aerospace Limited	00245740	Airport House The Airport Cambridge CB5 8RY
Marshall Land Systems Ltd	02661432	Airport House The Airport Cambridge CB5 8RY
Slingsby Advanced Composites Limited	1688938	Airport House The Airport Cambridge CB5 8RY
Slingsby Limited	5854423	Airport House The Airport Cambridge CB5 8RY
Slingsby Aviation Limited	6647044	Airport House The Airport Cambridge CB5 8RY
Slingsby Aerospace Limited	6647058	Airport House The Airport Cambridge CB5 8RY
Slingsby Holdings Limited	6660823	Airport House The Airport Cambridge CB5 8RY
Marshall Aircraft Sales Limited	9453963	Airport House The Airport Cambridge CB5 8RY

Marshall ADG	10567163	Airport House The Airport Cambridge CB5 8RY
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