

PRIVACY NOTICE

1. INTRODUCTION

Sangfroid Group Limited is committed to protecting the privacy and personal data of all individuals with whom it interacts, including employees, contractors, clients, suppliers, website visitors, candidates and other stakeholders. This Privacy Notice explains how personal data is collected, used, stored, protected and shared in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other applicable data protection laws.

Sangfroid Group Ltd acts as a Data Controller for the personal information described within this notice.

2. WHY WE COLLECT PERSONAL INFORMATION

We may collect and process personal information for the following purposes:

- Recruitment and onboarding activities.
- Contractor management and deployment.
- Employment administration and payroll.
- Client relationship management.
- Supplier and subcontractor management.
- Contract performance and service delivery.
- Security vetting and due diligence activities.
- Health, safety, security and welfare management.
- Business continuity and incident management.
- Marketing and business development activities.
- Compliance with legal and regulatory obligations.
- Website administration and security monitoring.

3. LAWFUL BASIS FOR PROCESSING

Personal information is processed only where a lawful basis exists under UK GDPR. These may include:

- Consent.
- Performance of a contract.
- Compliance with a legal obligation.
- Protection of vital interests.
- Legitimate interests pursued by Sangfroid Group Ltd.
- Performance of tasks carried out in the public interest where applicable.

Where processing is based on legitimate interests, Sangfroid Group Ltd will conduct an assessment to ensure that such interests do not override the rights and freedoms of the individual.

4. PERSONAL INFORMATION WE COLLECT

Employees and Contractors

We may collect:

- Full name.
- Date of birth.
- Address.

- Telephone numbers.
- Email addresses.
- Nationality.
- Passport details.
- Right-to-work documentation.
- Employment history.
- Qualifications and certifications.
- Next of kin information.
- Payroll and banking information.
- Training records.
- Performance and disciplinary records.

Candidates

We may collect:

- CVs and applications.
- Employment history.
- Qualifications.
- References.
- Interview notes.
- Vetting information.

Clients and Business Contacts

We may collect:

- Names.
- Job titles.
- Business contact details.
- Correspondence records.
- Contractual information.

Suppliers and Service Providers

We may collect:

- Contact details.
- Company information.
- Financial information.
- Due diligence information.
- Contractual records.

Website Users

We may collect:

- IP addresses.
- Browser information.
- Website usage information.
- Cookie-related information.

5. SPECIAL CATEGORY DATA

Where required and legally permitted, Sangfroid Group Ltd may process:

- Health and medical information.
- Fitness-for-work assessments.
- Disability information.

- Biometric information where required for access control or security purposes.

Special category data is processed only where an appropriate Article 9 condition exists and additional safeguards are applied.

6. SOURCES OF PERSONAL INFORMATION

Personal information may be obtained directly from individuals or through:

- Recruitment agencies.
- Professional referees.
- Clients.
- Publicly available sources.
- Government authorities.
- Background screening providers.
- Security vetting providers.
- Training providers.

7. INFORMATION SHARING

Personal information may be shared with:

- Group companies.
- Clients where necessary for contract delivery.
- Payroll providers.
- IT and cloud service providers.
- Professional advisers.
- Auditors.
- Regulatory authorities.
- Law enforcement agencies where required by law.
- Vetting and screening providers.

All third parties are required to maintain appropriate confidentiality and security measures.

8. INTERNATIONAL TRANSFERS

Due to the international nature of Sangfroid Group Ltd operations, personal information may be transferred outside the United Kingdom.

Where such transfers occur, appropriate safeguards will be implemented including:

- UK International Data Transfer Agreements.
- UK Addendum to Standard Contractual Clauses.
- Adequacy Regulations.
- Other approved transfer mechanisms.

9. RETENTION OF INFORMATION

Personal information will only be retained for as long as required:

- To fulfil the purpose for which it was collected.
- To comply with legal obligations.
- To support contractual requirements.
- To defend legal claims.

Retention periods are defined within the Company's Data Retention Schedule.

10. SECURITY OF PERSONAL INFORMATION

Sangfroid Group Ltd implements appropriate technical and organisational measures to protect personal information including:

- Access controls.
- Multi-factor authentication.
- Encryption.
- Secure document management systems.
- Employee training.
- Incident response procedures.
- Regular security reviews.

11. CHILDREN'S INFORMATION

Sangfroid Group Ltd does not knowingly collect personal information from children under the age of 16 unless required by law or with appropriate parental or guardian consent.

12. INDIVIDUAL RIGHTS

Individuals have the right to:

- Be informed.
- Access their personal data.
- Correct inaccurate information.
- Request erasure where applicable.
- Restrict processing.
- Data portability.
- Object to processing.
- Challenge automated decision-making.

Requests should be submitted to the Data Protection Officer.

13. COOKIES

The Company website may use cookies and similar technologies to improve user experience, maintain security and analyse website performance.

Further information is available within the Company's Cookie Policy.

14. AUTOMATED DECISION MAKING

Sangfroid Group Ltd does not normally undertake automated decision-making or profiling that produces legal or similarly significant effects on individuals.

15. COMPLAINTS

Any concerns regarding the processing of personal information should be directed to:

Data Protection Officer

Sangfroid Group Ltd

Email: compliance@sangfroidgroup.com

Individuals also have the right to lodge a complaint with the Information Commissioner's Office (ICO).

16. FURTHER INFORMATION

Questions regarding this Privacy Notice or data protection matters should be directed to the Compliance and Data Protection function.

Compliance & Data Protection Function
Sangfroid Group Ltd

Email: compliance@sangfroidgroup.com

Individuals also retain the right to complain to the Information Commissioner's Office (ICO).

17. DOCUMENT REVIEW

This Privacy Notice shall be reviewed annually or following:

- Legislative changes.
- Organisational changes.
- Significant data incidents.
- Regulatory requirements.



Harry Hayes
Chief Operating Officer

16 September 2026