

## 1. Introduction

This privacy notice describes how and why Stellar HR (“Stellar HR”, “we” or “us”) collects and uses personal data (i.e. data relating to an identified or identifiable individual) in the course of its business. It applies to personal data provided directly to us by the individuals concerned and to personal data provided to us by companies and other organisations.

We are committed to the protection of personal data and to fair and transparent processing. If you have any questions about this Privacy Notice, you can contact our Data Protection Officer via email at [linda@stellarhr.co.uk](mailto:linda@stellarhr.co.uk).

## 2. Security of personal Data

We have policies, procedures and training in place in respect of data protection, confidentiality and information security. We regularly review such measures with the objective of ensuring their continuing effectiveness

## 3. International transfers of personal Data

In the course of running our business and providing services to clients we may transfer personal data to third parties located in other countries, including countries outside the EEA. Where we transfer personal data to a country not determined by the European Commission to provide an adequate level of protection for personal data, we will only do so under a form of agreement approved by the European Commission, such as the Standard Contractual Clauses.

## 4. Provision of personal data to third parties

We will only share personal data with third parties where we are legally permitted to do so. We do not provide information to third parties for their own marketing purposes and we do not undertake mailings for third parties. Where we transfer personal data to third parties, we will put in place appropriate contractual arrangements and seek to ensure that there are appropriate technical and organizational measures in place to protect personal data.

We may provide personal data to:

- Third parties involved in the performance of services – we may also share personal data to third party organizations who assist us in providing services to clients or are otherwise involved in the services we provide to clients.
- Third parties who provide IT services, data processing or functionality – like many professional service providers, we use third party providers to support our business and the provision of services to our clients, such as cloud based software providers, web hosting/management providers, data analysis providers, and data back-up and security/storage providers. We may transfer personal data to such third parties.
- Auditors and advisers – we may transfer personal data to our auditors and advisers as required by law or as reasonably required in the management of our business.
- Third parties where required by applicable law and regulation – we may be requested or compelled to disclose personal data to third parties such as regulators and law enforcement agencies. We will only provide personal data to such parties where there is a legal requirement or permission to do so.

## 5. Your Rights

You have rights in relation to any of your personal data held by us as a data controller. Should you wish to exercise your rights or right, please contact our Data Protection Officer via email at [linda@stellarhr.co.uk](mailto:linda@stellarhr.co.uk). We will endeavour to respond to any request promptly and within any legally required time limit.

You also have a right to update your personal data that we hold. To do so, please either update the personal data via the web page or applications open to you, contact your usual Lambert contact or otherwise contact our Data Protection Officer via email at [linda@stellarhr.co.uk](mailto:linda@stellarhr.co.uk).

Where we process your personal data based on your consent, you have a right to withdraw consent at any time. Should you wish to do so, please contact our Data Protection Officer via email at [linda@stellarhr.co.uk](mailto:linda@stellarhr.co.uk)

## 6. Complaints

Should you wish to complain about our use of your personal data, please contact our Data Protection Officer via email at [linda@stellarhr.co.uk](mailto:linda@stellarhr.co.uk). We will investigate all complaints received and will endeavour to respond to complaints promptly.

## 7. Data Retention

We will only keep personal data for as long as necessary for the purposes for which it was collected, or as required by applicable law or regulation.

Unless there are any overriding legal, regulatory or contractual requirements, we will retain records of services provided (which may include personal data) in accordance with our document retention policy.