

# PRIVACY NOTICE



Last Updated: 26 December 2019

LTS International Ltd (“LTS”, “we”, “us”, or “our”) is dedicated to protecting your personal information and your trust is important to us. This Privacy Notice informs individuals (“you”, “your”, or “their”) how our organisation uses the personal information we collect, use, process, share, or transfer and applies to personal information provided to us by both, the individuals themselves or by third parties. LTS only uses personal information for purposes consistent with this privacy notice.

LTS keeps its privacy notice under regular review and places any updates on the company website ([www.ltsi.co.uk](http://www.ltsi.co.uk)). The latest effective date will be highlighted at the top of this notice. We encourage you to periodically review this privacy notice to ensure you are up-to-date with any changes.

Our privacy policies applies only to the actions of LTS and user interactions with us. It does not extend to any websites or companies that can be accessed from our website including but not limited to any links we may provide to social media websites or partner companies. If you share your information with another company, please refer to their privacy policy.

## Topics:

1. HOW WE COLLECT YOUR PERSONAL DATA
2. WHAT PERSONAL DATA WE COLLECT
3. HOW WE USE YOUR PERSONAL DATA
  - SPECIAL CATEGORIES
  - MARKETING AND FUTURE OPPORTUNITIES
  - TRANSFERS OF YOUR DATA
4. HOW WE STORE YOUR PERSONAL INFORMATION
5. YOUR DATA PROTECTION RIGHTS
6. HOW TO CONTACT US
  - HOW WE USE YOUR PERSONAL INFORMATION TO HANDLE YOUR GDPR RIGHTS REQUESTS

## 1. How we collect your personal data

You provide LTS with the majority of the personal information we collect. We use different methods including through

### Direct Interactions:

- Information that you provide to us when you contact us by telephone, post, e-mail, through our website or through any other means;
- CVs you provide or submit to LTS staff;
- Information provided essential to the fulfilment of contracts, services, or transactions you have requested (e.g., invoicing, travel provisions, contract preparation);
- Registering to our mailing lists (e.g. Darwin newsletter);
- Applications or responses submitted to employment advertisements.

### Third Party or publicly available sources:

- Reference’s provided by consultants, partners, or business contacts that you have named;
- Publicly posted information on social media and other websites (e.g. LinkedIn);

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Registered in Scotland Number 100833 VAT registration Number 267 7637 12

- Information given to us through consortium partners you are party to;
- Recruitment Agencies
- Background check providers in connection with an application to work with us as a consultant or employee including due diligence checks



**Automated technologies or interactions:** We may also receive your data indirectly from the information that we collect automatically through your access to our website ([www.ltsi.co.uk](http://www.ltsi.co.uk) and any sub-domains of the site unless expressly excluded by their own terms and conditions). We may also obtain your data through your interactions with our social media pages.

## 2. What personal data we collect

We collect information that identifies you as a specific individual (e.g., consultants, candidates, suppliers, business contacts and website users) and can be used to contact or identify you. It does not include any data where the identity has been removed or anonymised. We only collect data that is relevant to the type of interaction and services provided to and from LTS.

We may collect, use, retain, or transfer data from the following categories:

- **Identity:** first and last names, maiden names, gender, nationality, date of birth, relationship or marital status.
- **Contact:** postal address, email address, telephone numbers, business contact address and telephone numbers, emergency contact details.
- **Biographical:** any information provided within your CV or applications including occupation, references and previous employment history, qualifications and skills, as well as, your performance or contractual performance history with us.
- **Support Services:** bank account, payment, or invoicing information, passport and travel visa information, interests and marketing preferences.
- **Technical:** IP address, date, times, and frequency with which you access the website and the way you use and interact with its content.
- **Special/Sensitive:** where we are permitted to do so by law and as necessary for fulfilling our services to you we may collect sensitive information including race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data and criminal convictions and offences.

We will only process your personal data if we consider it fair and lawful to do so.

## 3. How we use your Personal Data

LTS only uses personal information for purposes consistent with this Privacy Notice and where the law allows us to. We may use your data where:

- Where it is necessary for the **legitimate interest** of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- As necessary in the **performance of contract** which you have entered into or to take steps at your request before entering into such a contract.



- To **comply with a legal or regulatory obligation** where processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.
- Where we have your **informed consent**, which was freely given to process your personal data. You are entitled to withdraw your consent at any time. LTS relies on consent as a basis for processing when undertaking marketing and promotional activities and media releases.



A description of how we use your data and the legal basis we rely on is set out in the table below. This includes our communication to you through email, post, telephone, newsletters, website or in response to an inquiry you have made.

Purpose/Activity	Type of Data	Lawful basis for processing
As part of our recruitment process which includes assessing your suitability for a role, carrying out reference checks, keeping records, etc.	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Biographical</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (to grow our business and to inform our structure)</li> <li>• Performance of a contract with you</li> <li>• complying with our legal/regulatory obligations</li> </ul>
To provide services to clients, to gain additional work and to provide you with further opportunities if you are working with us.	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Biographical</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (to grow our business and to inform our structure)</li> <li>• Performance of a contract with you</li> </ul>
To carry out support services and other services to you in relation to a contract	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Biographical</li> <li>• Support services</li> <li>• Sensitive</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary to comply with a legal obligation</li> </ul>
Submission of documents to our clients	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Biographical</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (to grow our business and to inform our structure)</li> <li>• Performance of a contract with you</li> </ul>
To provide services to clients, to gain additional work and to provide you with further opportunities if you are working with us.	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Biographical</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (to grow our business and to inform our structure)</li> <li>• Performance of a contract with you</li> <li>• Consent</li> </ul>
Compliance with relevant laws or other legal works	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Biographical</li> <li>• Support services</li> <li>• Sensitive</li> <li>• Technical</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (for security purposes and to protect our business)</li> <li>• Necessary to comply with a legal obligation</li> </ul>





Carrying out background or reference checks, including due diligence	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Biographical</li> <li>• Sensitive</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary to comply with a legal obligation</li> </ul>
To provide newsletters and other project related information, publications, and marketing and to share with our clients or business partners for the same purpose.	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Support Services</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (to grow our business and to inform our structure)</li> <li>• Performance of a contract with you</li> <li>• Consent</li> </ul>
Improvements to our website content and navigation	<ul style="list-style-type: none"> <li>• Technical</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (to keep our website updated and relevant, to develop our business and to inform our strategy)</li> </ul>

## Special Categories

We will use sensitive information when you apply to work with us and to carry out our services and contracts. We will only use this information where it is necessary and lawful to do so. This may include:

- Information on criminal convictions dependent on the role you are applying for
- Information on disabilities when considering appropriate adjustments to working conditions
- Information on about your health if providing you with travel insurance or health screening

## Marketing and Future Opportunities

The data you provide to us, as well as the data we have collected about you indirectly, may be used by us for marketing and tendering opportunities (hereafter referred to as “opportunities”). When positioning for new opportunities, LTS may share old project reports or tenders with third party development aid providers or business partners.

We may also share project reports, publications, and news updates on our website and social media accounts. LTS may link to your social media accounts or affiliated websites. This may indirectly allow third parties to find or collect personal data on yourself.

You may exercise your right to opt out of receiving any marketing material or information on future opportunities at any time by contacting us at [mail@ltsi.co.uk](mailto:mail@ltsi.co.uk). When opting out of receiving this information, it will not apply to data gained as a result of another transaction, which we will continue to use under a lawful basis.

## Transfers of your data

We may transfer to, and store your personal data in countries other than the country in which data was originally collected, including destinations outside the European Economic Area (EEA). Those countries may not have the same data protection laws as the country in which you provided the data. When we transfer your data to other countries we will protect the data as described in this Privacy Notice and comply with applicable legal requirements providing adequate protection for the transfer of data to countries outside of the EEA. If you are



located in the EEA, we will only transfer your personal data if we have put in place appropriate safeguards in respect of the transfer, for example we have entered into EU standard contractual clauses with the recipient, or the recipient is a party to our binding corporate rules.



LTS may share or transfer your data to the following organisations:

- Within LTS International and NIRAS Group of companies;
- Project specific consortium partners;
- Third party organisations to provide support services (e.g., payroll, IT, insurance, travel, etc);
- Professional advisors (e.g., lawyers, auditors, and accountants);
- HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances; and
- Third parties for marketing or positioning of new opportunities (please see the [Marketing & Future Opportunities](#) section for more information).

We may use your information to protect the rights of the NIRAS Group, our partners, suppliers, clients, or others when we have reasonable grounds to believe that such rights or property have been or could be affected. We may also disclose your personal information as required by law and when we believe that disclosure is necessary to protect our rights, the rights of others, or to comply with a judicial proceeding, court order, or legal process served on our business or website.

LTS does not sell your personal data to any third-parties. We require all third parties we engage as processors to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our written instructions.

You may request more information about the safeguards that we have put into place in respect to personal data transfers by contacting us as described in [How to Contact Us](#) below.

## 4. How we store your personal information

At LTS, your personal data is held in a restricted access network location, accessible only to internal LTS staff and selected NIRAS Group staff. This data may be accessed outside the EU from LTS staff working remotely through a secure VPN.

If you have submitted your information to LTS, we will only retain your data for as long as necessary to fulfil the purposes we collected it for, including to satisfying any legal, accounting, or reporting requirements. When determining the data retention period, we consider the amount, nature, and sensitivity of the data, as well as, the purposes for processing data and whether we can achieve those purposes through other means and any legal requirements.

When deleting your data, it may persist on backup or archival media for legal, tax, or regulatory purposes.

If your data is included within multiple projects or tenders, the data will be subject to our retention policy as separate entries. This may result in your personal data being held for longer than scheduled timeframes. For more information about our retention policy, please contact us at [mail@ltsi.co.uk](mailto:mail@ltsi.co.uk).

We have put into place technical and organisational measures to deal with any suspected data breaches. If you suspect any misuse, loss, or unauthorised access to your data, please contact us immediately by emailing [mail@ltsi.co.uk](mailto:mail@ltsi.co.uk).





## 5. Your Data Protection Rights

We implement reasonable physical, administrative and technical safeguards to help us protect the confidentiality, security, and integrity of your personal information and prevent the loss, misuse, and unauthorised access, interception, or information alteration.

Your choice to disclose personal information in an email submission or online form is voluntary. Unfortunately, no data transmission over the Internet is 100% secure. While we strive to protect your personal information, third parties may unlawfully intercept or access transmissions or private communications.

LTS would like to make sure you are fully aware of all your data protection rights. Every individual is entitled to the following:

### **The Right to be Informed**

You have the right to be informed in how LTS use your personal data. This privacy notice serves to inform you of our company policy.

### **The Right to Access**

You have the right to request LTS for copies of your personal information.

### **The Right to Rectification**

You have the right to request that LTS correct any information you believe is inaccurate. You also have the right to request LTS to complete information you believe is incomplete.

### **The Right to Erasure**

You have the right to request that our company erase your personal data, under certain conditions.

### **The Right to Restrict Processing**

You have the right to request that LTS restrict the processing of your personal data, under certain conditions.

### **The Right to Object to Processing**

You have the right to object to LTS processing of your personal information, under certain conditions.

### **The Right to Data Portability**

You have the right to request that LTS Transfer the data that we have collected to another organisation, or directly to you, under certain conditions.

## 6. How to contact us

If you have any complaints about how we handle your data please contact us so we can resolve the issue, where possible.

Under data protection legislation an individual has the right to access the information that an organisation holds about them. Accessing personal data in this way is known as making a subject access request. Your subject access request may be submitted in any format you wish, but we have created a standard Subject Access Request Form for your convenience. This can be downloaded from our webpage (below). Using this form will help us verify your identity and give a timely and accurate response to your request. There is no charge for making a request.

On receipt of your request, we will let you know the statutory deadline by which we will reply. If, on receipt of our response, you consider that LTS has not dealt correctly with your request, please follow the escalation process explained within our original response. If you feel that LTS has not addressed your concern in a satisfactory manner, you may contact the Information Commissioner's Office (ICO).



Any other request to exercise your rights may be submitted in any form you wish. Please try to be as specific as possible about what personal data you are asking to be rectified, erased, restricted or ported, or the nature of your objection. As with subject access requests, it helps to attach a picture/ scan of one form of photo ID to enable us to swiftly verify your identity. This ensures we do not disclose any of your personal information to unauthorised persons.



Please submit all requests and complaints to:

[mail@ltsi.co.uk](mailto:mail@ltsi.co.uk)

or

LTS International Ltd  
Pentlands Science Park  
Bush Loan  
Penicuik  
EH26 0PL  
United Kingdom

### **How we use your personal information to handle your GDPR rights requests**

LTS will use your information to log, consider, and answer your GDPR Rights requests, as well as to verify your identity. We will liaise with colleagues internally (including those with access to or otherwise responsible for the personal data in question) as well as, where applicable and necessary, third party individuals whose personal data may be intermingled with your own. If you pursue a complaint to the ICO and/or the courts, we will share your information as necessary in answering regulatory enquiries and making submissions.

These uses of your personal information are necessary to fulfil our legal obligations and public interest tasks in handling such requests.

