

GDPR Privacy Notice

This privacy notice aims to give you information on how Sopra Steria collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to our newsletter, purchase a product or service or take part in a competition. This privacy notice is part of the ["Site Terms of Use"](#).

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

WHO WE ARE AND HOW TO CONTACT US

Site publisher

Our website is the property of Sopra Steria Group; all rights reserved.

Legal status

Sopra Steria Group

Capital of 19 440 371 euros

RCS Annecy B 326 820 065 - APE 6311 Z

Registered Office

PAE - Les Glaisins - FR 74940 Annecy-le-Vieux

Headquarters

9 bis, rue de Presbourg - FR 75116 Paris

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This web site is hosted by:

EasyNet France : Le Capitole - 55 Avenue des Champs Pierreux - 92 000 Nanterre

www.fr.easynet.net

CONTROLLER

Sopra Steria in the UK is made up of different legal entities, details of which are as set out below (the Sopra Steria UK Group)

Company Name	Co Registered number	ICO registration	Registered Office	Home page URL
Sopra Steria Limited	04077975	Z5873869	Three Cherry Trees Lane Hemel Hempstead	www.soprasteria.co.uk
Sopra Steria Recruitment Limited	01437998	Z5311084	HP2 7AH Herts Tel + 44 (0) 370 600 4466	www.soprasteriarecruitment.co.uk

This privacy notice is issued on behalf of the Sopra Steria UK Group so when we mention “Company”, “we”, “us”, “our” or “Sopra Steria” in this privacy notice, we are referring to the relevant company in the Sopra Steria UK Group responsible for processing your data. We will let you know which entity will be the controller for your data when you purchase a product or service with us.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise [your legal rights](#), please contact the DPO using the details set out below.

Our **Data Protection Officer** is Peter Cashmore. His address is c/o Sopra Steria Limited, Three Cherry Trees Lane, Hemel Hempstead, HP2 7AH. His email address is dpo.uk@soprasteria.com.

The Supervisory Authority for each of the Companies in the Sopra Steria UK group listed above is the UK Information Commissioner www.ico.org.uk.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Welcome to the Sopra Steria privacy notice.

Sopra Steria respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our websites (regardless of where you visit from) and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Alternatively you can download a pdf version of the notice [here](#). Please also use the [Terms Used](#) section to understand the meaning of some of the terms used in this privacy notice.

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1. PURPOSE

The Company is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you as a user of our Site(s), in accordance with data protection law, including the General Data Protection Regulation (GDPR). It does not apply to any other relationship we may have with you, for instance as a Customer of or Supplier to the Company.

The Company whose site you have visited is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice. This notice does not form part of any contract of employment or other contract to provide services, other than the Site Terms of Use. This notice can be updated at any time and we will inform you if this occurs. It is important that you read this notice, together with any other privacy notice that may be provided on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

2. DATA PROTECTION PRINCIPLES

We will comply with the data protection principles set out in GDPR. These say that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

3. THE KIND OF INFORMATION WE HOLD ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

As a Site User we may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

There are "Special Categories" of more sensitive personal data which require a higher level of protection (this includes details about your 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).

We do not collect, store, or use Special Category information about you as a Site User. Nor do we collect any information about criminal convictions and offences.

It is important to us that the personal information we hold about you is accurate and current. Please keep us informed at info.uk@soprasteria.com if your personal information changes.

The purposes for which we may use this information are outlined below.

4. HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our products or services;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns which might be used with other identifying data to establish other personal information about you. We collect this data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our [cookie policy](#) for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Identity and Technical Data from the following parties:
 - analytics providers such as Google, Eloqua
 - social media channels such as Facebook, LinkedIn, Twitter, Instagram, YouTube; and
 - Identity and Contact Data from data brokers or aggregators where you have given consent or it is within our legitimate interests for your data to be used in this way.
 - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register.

5. HOW WE WILL USE INFORMATION ABOUT YOU

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Read the Legal Rights to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to

withdraw consent to marketing at any time by contacting us at info.uk@soprasteria.com.

6. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy notice (b) Asking you to take a survey	(a) Identity (b) Contact (c) Marketing and Communications	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant content to you	(a) Identity (b) Contact (c) Usage (d) Marketing and Communications (e) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing. If you would like to know about your marketing preferences please contact info.uk@soprasteria.com.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think your organisation may want or need, or what may be of interest to it. This is how we decide which products, services and offers may be relevant for your organisation (we call this marketing).

You may receive marketing communications from us if you have registered or requested to receive information from us or purchased services from us or if you provided us with your details in other ways, and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will not share your personal data with any company outside the Sopra Steria UK group of companies for marketing purposes.

Opting out

You can ask us to stop sending you marketing messages at any time by logging into the Preferences Centre and checking or unchecking relevant boxes to adjust your marketing preferences, by following the opt-out links on any marketing message sent to you, or by contacting us at any time at info.uk@soprasteria.com.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. You can find more information [here](#). If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our [Cookie Policy](#).

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [Contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making unless we have a lawful basis for doing so and we have notified you.

7. DATA SHARING

We will in some circumstances have to share your data with third parties, including third-party service providers and other Sopra Steria Group entities. We require third parties to respect the security of your data and to treat it in accordance with the law.

We will in some circumstances transfer your personal information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law. This will, in some circumstances, involve sharing special categories of personal data and, where relevant, data about criminal convictions/allegations.

We may also share your personal information with

- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice

Which third-party service providers process my personal information?

Some of our group systems are hosted by third parties who also process the data for the purposes set out in this Privacy Notice. These include Oracle, and our site hosting provider. Our site also contains cookies set by third parties, as set out in our [Cookie Policy](#).

How secure is my information with third-party service providers?

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

If a third party provider such as "Facebook" or "LinkedIn" uses your personal information for their own purposes, they do so as data controller, must inform you of what data they are using and the reasons why they using it, and possibly request your consent or that you contract with them directly.

When might you share my personal information with other organisations within the Sopra Steria group?

Because our group systems (including this website) are hosted in France, your personal information may be transmitted to, stored and processed in France. We may share your personal information with other Companies in the UK group or with wider Sopra Steria group organisations for the purposes set in '[Purposes for which we will use your personal data](#)' above.

What about other third parties?

If required, we will need to share your personal information with a regulator or to otherwise comply with the law.

Transferring information outside the EU

We may transfer the personal information we collect about you to the following countries outside the EU

- India
- United States

There is not an adequacy decision by the European Commission in respect of those countries. This means that the countries to which we transfer your data are not deemed to provide an adequate level of protection for your personal information.

However, to ensure that your personal information does receive an adequate level of protection we have put in place the following appropriate measures to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection:

- In respect of transfers of your personal data to Sopra Steria India; EEC Model Clauses which are deemed to provide an adequate level of protection under Commission Decision C 2010/593.
- In respect of transfers of your personal data to the United States; we transfer your personal information only to third parties who have signed up to the US Privacy Shield or with whom we have concluded contracts which we assess as providing adequate protection.

If you require further information about these protective measures, you can request it from Data Protection Officer, Sopra Steria Limited, Three Cherry Trees Lane, Hemel Hempstead HP2 7AH or at dpo.uk@soprasteria.com.

8. DATA SECURITY

We have put in place measures to protect the security of your information.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

9. DATA RETENTION

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

10. RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

Your rights in connection with personal information

Under certain circumstances, by law you have the legal rights set out in the [Terms Used](#).

If you want exercise any of these rights, please contact Data Protection Officer, Sopra Steria Limited, Three Cherry Trees Lane, Hemel Hempstead HP2 7AH in writing, or email dpo.uk@soprasteria.com. Please note that the Data Protection Act 2018 may apply so that we do not have to grant your request in full. However, we will always meet your request as far as we are able.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we are allowed under the law to charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we can refuse to comply with the request in such circumstances.

What we may need from you

We sometimes need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it. If you do not provide such information in a timely manner, this may delay our response to your request.

11. DATA PROTECTION OFFICER

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO at Data Protection Officer, The Company Limited, Three Cherry Trees Lane, Hemel Hempstead HP2 7AH or dpo.uk@soprasteria.com.

12. CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We will also notify you in other ways from time to time about the processing of your personal information.

13. TERMS USED

LAWFUL BASIS

Legitimate Interest means the 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 make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. 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). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#).

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you have any questions about this privacy notice, please contact Data Protection Officer, Sopra Steria Limited, Three Cherry Trees Lane, Hemel Hempstead HP2 7AH or dpo.uk@soprasteria.com.

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24 May 2018