Privacy Policy

Policy Purpose and Scope

Hamzah Services Ltd, along with its affiliates and subsidiaries, prioritizes the privacy and data protection of its employees, contractors, clients, potential clients, service providers, and other associates or third parties, adhering strictly to global Data Protection and Privacy regulations. This Policy has been established to define and clarify the principles governing the collection, processing, transfer, and use of personal data in our daily business operations.

Hamzah Services Ltd seeks to manage its business effectively by collecting, using, and disclosing Personal Data responsibly, ensuring minimal intrusion and adherence to relevant local laws. In certain jurisdictions, additional legal requirements may apply beyond this policy's scope. Data Protection and Privacy remain central to Hamzah Services Ltd's business standards and practices.

Definitions

Data Protection or Data Privacy refers to the collection, processing, use, storage, security, and transfer of Personal Data in accordance with relevant laws and the guidelines set forth in this Policy.

Data Subject indicates any individual associated with Personal Data, including employees (temporary or permanent), applicants, clients and their employees, contractors, service providers, prospective clients and their employees, or other partners when Personal Data is gathered.

Personal Data encompasses any information about an identified or identifiable natural person, including details on current, past, and potential employees, clients, contractors, service providers, and other associated third parties. Examples of such information include: name, email, postal address, personal phone/fax number, employee ID, Social Security/national ID number, birth date, salary, stock information, job title, benefits, family details, employment history, training records, address details, background checks, drug tests (as permitted by law), and business card details, among others.

Processing Personal Data (Processing) covers any actions taken on Personal Data, whether manually or electronically. These actions include collecting, recording, copying, organizing, storing, adapting, altering, retrieving, consulting, using, sharing through transmission or other means, and making Personal Data accessible. It also encompasses aligning, combining, blocking, erasing, or destroying Personal Data.

Sensitive Data is a category within Personal Data that, depending on local regulations, may include but is not limited to information about race, ethnicity, religious or philosophical beliefs, political affiliations or opinions, trade union membership, health details, sexual orientation, disabilities, or specific types of financial information.

Definitions

If your purpose is to make your existing and future clients aware of your online presence, then a brochure website is the perfect solution for your business, whether it's in property construction, a hair and beauty salon, or another industry. A brochure website can interactively represent your business. Our strategy:

- 1. Maintenance of employment records
- 2. Conducting employee performance reviews and assessment processes
- 3. Administration of wage and stock option plans
- 4. Oversight of training programs
- 5. Management of employment terminations
- 6. Recording performance evaluations and disciplinary actions
- 7. Planning and reporting on staffing requirements
- 8. Conducting background checks and, where permitted, drug testing
- 9. Management of expenses
- 10. Administration of pension plans
- 11. Oversight of health programs
- 12. Management of health insurance and other benefits
- 13. Maintaining Company intranet information for internal communication
- 14. Monitoring for equal opportunities
- 15. Compliance with legal requirements (e.g., statutory, regulatory, or court-ordered) or contracts, including responding to administrative or judicial actions such as subpoenas, search warrants, or wage garnishments
- 16. Cooperation with government or law enforcement agencies, as required by applicable law
- 17. Response to emergencies that Hamza Services Ltd reasonably believes may risk harm to individuals, property, or business interests
- 18. Managing and cultivating business relationships with clients, prospective clients, service providers, and other third-party partners, including business development and marketing activities
- 19. Processing of clients' Personal Data by Hamza Services Ltd and its employees

20. Additional roles or responsibilities related to the effective operation of Hamza Services Ltd's businessData Protection and Privacy Principles

Data Protection and Privacy Principles

The following Data Protection and Privacy principles serve as the foundation of this Policy. Hamza Services Ltd will continuously oversee the application of these principles through effective management and controls to ensure ongoing compliance. As a core commitment, Hamza Services Ltd will process all Personal Data fairly, sensitively, and respectfully, in line with this Policy and relevant local legislation.

Notice: Hamza Services Ltd will provide individuals with information regarding the purposes of Personal Data collection, how to reach Hamza Services Ltd with any questions or concerns, and the process for addressing complaints. When applicable, Hamza Services Ltd will identify the types of third parties to whom Personal Data may be disclosed, as well as the options, procedures, and methods offered for limiting the use and sharing of personal information.

Choice: In accordance with local laws, Hamza Services Ltd policies, and business procedures, Hamza Services Ltd will ensure that Data Subjects can fully exercise their rights regarding their Personal Data. This includes the individual's right to determine how their data is used, particularly if the use differs from its original purpose or if it is shared with third parties, subject to any legal requirements for disclosure and consent.

Onward Transfer: Hamza Services Ltd will safeguard all transfers of Personal Data, whether within its group or beyond, in line with relevant local laws and by using appropriate protections. Additionally, unless required by a court or other legal authority, Personal Data will only be shared outside of Hamza Services Ltd if the recipient party has established a Data Protection Agreement with Hamza Services Ltd or has equivalent protections in place. When Personal Data is shared externally, Hamzah Services Ltd will take necessary steps to protect the rights and interests of Data Subjects as outlined in this Policy and local legal standards.

Security: Hamza Services Ltd is dedicated to safeguarding Personal Data from unauthorized access or disclosure. To protect the appropriate use of Personal Data and prevent its loss, alteration, or destruction, security measures will be implemented across all relevant technological systems. Hamzah Services Ltd will adhere to global Data Protection and Privacy laws, as well as internal policies, to ensure security standards are met at all infrastructure points.

Data Integrity: Hamza Services Ltd only collects and processes Personal Data that is relevant and necessary for legitimate business purposes or legal compliance. We take steps to maintain the accuracy, relevance, and reliability of Personal Data for its intended use. Data Subjects are encouraged to update their information as needed to assist in keeping records accurate and current. In instances where data is no longer needed or relevant, we follow procedures to securely delete or anonymize the data, in compliance with legal and regulatory requirements.

Data Retention: Hamza Services Ltd retains Personal Data only for as long as necessary to fulfill its intended purpose or as required by applicable laws, contracts, internal policies, or statutory limitations. When the retention period expires, Personal Data is securely disposed of or anonymized in line with best practices and regulatory standards. This ensures that data is not held longer than necessary, minimizing privacy risks and supporting data minimization principles.

Access: Hamza Services Ltd provides Data Subjects with the right to access their Personal Data, and where necessary, to request corrections or updates in accordance with relevant laws and company policies. Requests for data access are reviewed and granted based on verification of the Data Subject's identity, to ensure that data is only accessed by authorized individuals. In some instances, access may be limited by other legal obligations, but Data Subjects will be informed if access is restricted.

Enforcement and Oversight: Hamza Services Ltd handles complaints or disputes regarding Personal Data in an efficient and transparent manner. Data Subjects are informed about the procedures for filing complaints or inquiries, and we strive to resolve issues promptly. Regular internal assessments and audits are conducted to ensure this Policy remains effective and up to date. Where necessary, Hamza Services Ltd cooperates with Data Protection Authorities to address any concerns and acts on their recommendations to enhance our data protection practices.

Training and Audit: Hamza Services Ltd provides ongoing training to staff members handling Personal Data, ensuring they are fully aware of their responsibilities and the importance of compliance with privacy laws and policies. Additionally, we perform regular audits on data processing activities to ensure that privacy standards are upheld, and that any identified gaps are addressed promptly to maintain compliance.

Transferring your data outside the "EEA"

We may transfer your data outside the European Economic Area (the "EEA").

Some of those countries have a European Commission adequacy decision, which means they are considered to offer an adequate level of data protection.

Other countries do not have the same level of legal protection as countries in the EEA, or with an <u>adequacy decision</u>. If we do transfer your data in this way, we will take steps to ensure that it is protected to the same levels that apply in the EEA. This may include, for example, ensuring that the organisation receiving the data is registered with the EU-US Privacy Shield (in the case of transfers to the USA), or that we use the EU's <u>model</u> contractual clauses.

Covered Entities

This Policy applies to Hamza Services Ltd and any non-Hamza Services Ltd entities (e.g., agents, contractors, outsourced service providers) handling or processing Personal Data on behalf of Hamza Services Ltd.

Responsibilities

The Data Officer of Hamza Services Ltd holds primary responsibility for the adoption, implementation, and maintenance of this Privacy Policy. However, every employee, manager, contractor, and agent has an obligation to uphold data privacy standards, safeguard Personal Data, and adhere to this Policy. Non-compliance may result in disciplinary action, including employment termination or contractual penalties, where applicable. Additionally, individuals who knowingly misuse Personal Data may be subject to legal consequences, as data misuse can constitute a criminal offense.

Data Privacy Investigation and Dispute Resolution

Human Resources at Hamza Services Ltd is responsible for addressing and resolving complaints regarding Personal Data. All inquiries from Data Subjects, regulatory bodies, or internal parties are managed according to applicable laws. Investigations are led by designated personnel and conducted under strict confidentiality, ensuring compliance with jurisdiction-specific legal requirements and protecting the rights of Data Subjects.

Access to Personal Data

The Data Officer at Hamza Services Ltd is responsible for the secure maintenance of Personal Data, ensuring that only those with a legitimate, work-related need can access it. Access permissions are carefully controlled, and all individuals requesting access to Personal Data must authenticate their identity according to Hamza Services Ltd's security standards. Requests from Data Subjects to review their information are handled with strict privacy and security, ensuring compliance with internal policies and legal obligations.

Data Subjects may review or obtain copies of relevant documents in accordance with their rights, although they may not remove original files from Hamza Services Ltd premises. Access to certain records, such as confidential investigative files, may be restricted based on the sensitive nature of the content or specific legal requirements.

Verification of Employment

Only Human Resources personnel are authorized to verify an employee's employment status for external inquiries. This information is limited to the employee's name, current job title, and dates of employment with Hamza Services Ltd. Additional employment details will only be provided with the express consent of the employee.

Cookies

Hamza Services Ltd uses cookies on its website to improve user experience and analyze website traffic. Individuals who wish to opt-out of tracking via Google Analytics can do so by visiting http://tools.google.com/dlpage/gaoptout.

Use of Universal Analytics (Google)

```
_ga
_gali
_gat_ UA 112356073-1
_gid
```

Purpose: These cookies collect information about how visitors use our website. We use the information to compile reports and to make improvements. The cookies collect information in an anonymous form, including where visitors have come to the website from and the pages they visited.

Contacting us

For questions about this notice or any data protection or privacy concerns, please contact us at info@hamzahservices.co.uk

Changes to Policy

Hamza Services Ltd may occasionally update this Policy to reflect new legal requirements. Any significant changes will be communicated to individuals as soon as reasonably possible.