

## CMS Corporate Mailing Solutions Limited – Privacy Policy

### Document control

| Field              | Detail                      |
|--------------------|-----------------------------|
| Document title     | Privacy Policy              |
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| Next review date   | April 2027                  |
| Document owner     | Compliance Manager          |

### Reference Matrix

| Standard                       | Clause / Control | Area of Focus                                |
|--------------------------------|------------------|----------------------------------------------|
| ISO 27001:2022                 | A5.34            | Privacy and protection of PII                |
| UK GDPR                        | Art. 13 & 14     | Information to be provided to data subjects  |
| UK GDPR                        | Art. 15 – 22     | Rights of data subjects                      |
| Data (Use and Access) Act 2025 | -                | Supplementary UK data protection obligations |

## About This Policy

This privacy policy explains how CMS Corporate Mailing Solutions Limited ("CMS", "we", "us", "our") collects, uses, stores, and protects personal data when we act as a data controller. It applies to our employees, former employees, job applicants, clients, suppliers, website visitors, and anyone else whose personal data we hold in our own right.

CMS also acts as a data processor on behalf of our clients when processing their data for print, mailing, and communications services. In those circumstances, the relevant client is the data controller and their privacy policy governs how their data subjects are informed. This policy does not cover that processing.

## Who we are

CMS Corporate Mailing Solutions Limited is registered in England and Wales. Our registered address is 3 Courthouse Close, Winslow, Bucks, MK18 3QH.

For all data protection enquiries, please contact our Compliance Manager on 0330 0555 350.

We are registered with the Information Commissioner's Office (ICO). Our registration number is Z8392816.

## What personal data we collect and why

We collect and use personal data in the following circumstances where we act as data controller.

### Employees and contractors

We hold employment records including name, contact details, address, date of birth, payroll and financial information, emergency contacts, absence and performance records, and competence and training history. For certain roles, we also hold the results of background checks conducted during the employment induction period, including DBS checks, CCJ searches, and five-year address history. We process this data to manage the employment relationship, meet our payroll and tax obligations, maintain a safe and compliant workplace, and verify that individuals with access to sensitive data and production systems have been appropriately screened. Our legal basis is performance of a contract (Article 6(1)(b) UK GDPR) and compliance with legal obligations (Article 6(1)(c) UK GDPR). Where DBS checks are conducted, processing of criminal conviction data is carried out under Schedule 1 of the Data Protection Act 2018 and is subject to the consent of the individual concerned.

### Job applicants

We collect application information, references, identity documents, and right to work evidence. We process this data to assess suitability for employment and to verify the right to work in the UK in accordance with current Home Office guidance. Our legal basis is legitimate interests (Article 6(1)(f) UK GDPR) for the assessment of applications and references, and legal obligation (Article 6(1)(c) UK GDPR) for statutory right to work verification.

### **Clients and client contacts**

We hold contact names, email addresses, telephone numbers, and business correspondence associated with client organisations. We process this data to manage our commercial relationship, fulfil contractual obligations, and communicate about active projects. Our legal basis is performance of a contract (Article 6(1)(b) UK GDPR) and legitimate interests (Article 6(1)(f) UK GDPR).

### **Suppliers and supplier contacts**

We hold contact names, email addresses, telephone numbers, and business correspondence associated with supplier organisations. We process this data to manage our supply chain and fulfil our contractual and compliance obligations. Our legal basis is legitimate interests (Article 6(1)(f) UK GDPR).

### **Visitors to our premises**

We collect names, organisations, and visit times in our physical visitor log. We also operate CCTV across our premises, which captures visual images of all individuals present. We process this data to maintain the security of our premises and the safety of staff, visitors, and assets. Our legal basis is legitimate interests (Article 6(1)(f) UK GDPR). CCTV footage is retained for a maximum of 31 days and then automatically overwritten unless retained as evidence of a specific incident.

### **Website visitors**

Where our website uses cookies or collects any contact or enquiry information, we process that data to respond to enquiries and improve our online presence.

### **How long we keep your data**

We retain personal data only for as long as necessary for the purpose for which it was collected, and in accordance with our statutory obligations. Our full retention schedule is maintained internally in accordance with our Data Retention, Disposal and Security procedure. Key retention periods are as follows.

Employment records are retained for 7 years following termination of employment in accordance with payroll and tax record obligations. Background check records obtained during the induction period are retained in the individual's HR file for the duration of employment and for 7 years post-termination. DBS certificates are not retained beyond initial verification — only the outcome and date of the check are recorded. Job applicant records are retained for 6 months following a recruitment decision. Client and supplier contact records are retained for the duration of the commercial relationship and for 7 years thereafter in accordance with contract law limitation periods. Visitor log entries are retained for 12 months from the date of visit. CCTV footage is retained for a maximum of 31 days unless retained as evidence.

### **Who we share your data with**

We do not sell personal data. We share personal data only where necessary and with appropriate safeguards in place.

Employee data may be shared with our external payroll processor, HMRC, Peninsula HR (for HR advice and support), and the DBS checking service where applicable. Client and supplier contact data is not shared with third parties except where required by law or to fulfil a specific contractual obligation. CCTV footage may be provided to the police or other law enforcement authorities in response to a lawful request. We do not transfer personal data outside the UK or European Economic Area.

## **Your rights**

Under UK GDPR you have the following rights in respect of personal data we hold about you as a controller.

You have the right to access the personal data we hold about you. This is known as a Subject Access Request. You have the right to request correction of inaccurate or incomplete data. You have the right to request deletion of your data where there is no longer a lawful basis for us to hold it. You have the right to object to processing based on legitimate interests. You have the right to request that we restrict our processing of your data in certain circumstances. You have the right to receive your data in a portable format where processing is based on consent or contract and carried out by automated means.

To exercise any of these rights, please contact our Compliance Manager on 0330 0555 350. We will respond within one calendar month of receiving your request. We may need to verify your identity before fulfilling a request.

If you are not satisfied with how we have handled your personal data, you have the right to lodge a complaint with the Information Commissioner's Office at [ico.org.uk](https://ico.org.uk) or by calling 0303 123 1113.

## **How we protect your data**

We implement appropriate technical and organisational security measures to protect personal data against unauthorised access, disclosure, loss, or destruction. These include multi-factor authentication for remote access, encrypted data transfer, physical access controls to our premises, staff awareness training, and regular security auditing. Further detail is available on request.

## **Changes to this policy**

We review this policy annually and following any material change to our processing activities or applicable law. The current version is always available on our website and on request from our Compliance Manager.

### Who to contact

|                              |                    |
|------------------------------|--------------------|
| Questions about the document | Compliance Manager |
| Report a violation/incident  | Compliance Manager |
| Report an improvement        | Compliance Manager |

### Roles and responsibilities

| Role/Department | Responsibility                                                                                                                         |
|-----------------|----------------------------------------------------------------------------------------------------------------------------------------|
| Document Owner  | Maintaining, reviewing and approving this policy annually and following any material change to processing activities or applicable law |
| General Manager | Approving any material changes to the policy                                                                                           |
| All Employees   | Directing any data subject enquiry or rights request to the Compliance Manager promptly                                                |

### Related documents and references

| Document ID | Document Title                      |
|-------------|-------------------------------------|
| PRO-003     | Data Retention, Disposal & Security |
| PRO-005     | Legal & Regulatory Compliance       |
| POL-004     | Operations & Legal                  |
| WBK-004     | Operations & Legal (RoPA tab)       |

## Revision history

| Version | Date       | Description of change    | Author/Editor      |
|---------|------------|--------------------------|--------------------|
| V0.1    | 2026-04-10 | Initial document drafted | Compliance Manager |
| V1.0    | 2026-04-24 | No changes, made live    | Compliance Manager |