Data Protection Framework			QSP***
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1 INTRODUCTION

The SLR Group (the Company) has developed a Data Protection Policy which establishes its commitment to maintaining the privacy of any identified or identifiable natural person with whom it interacts during the course of its business. This confirms its commitment to comply at all times with the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679), {**the Regulations**} and/or the relevant Data Protection legislation in the countries in which members of the Company operate.

This document describes the framework through which the commitments made in the Data Protection Policy are implemented by SLR Group companies operating in the European Economic Area.

2 DEFINITIONS

The GDPR defines "Personal Data" as any information relating to an identified or identifiable natural person (described as a "data subject").

An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

3 THE DATA PROTECTION PRINCIPLES

The GDPR sets out the following principles with which any party handling Personal Data must comply. All Personal Data must be:

1. Processed lawfully, fairly, and in a transparent manner in relation to the data subject.

2. Collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes. Further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.

3. Adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.

4. Accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, is erased, or rectified without delay.

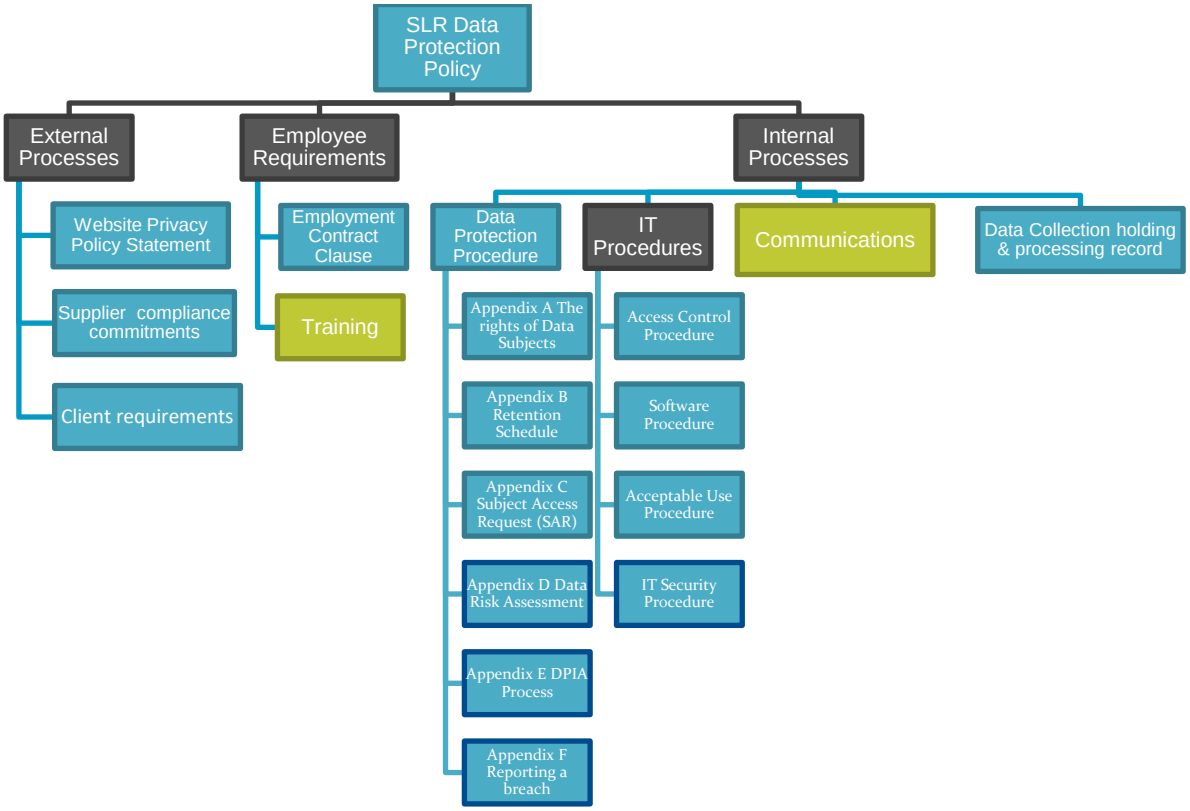
5. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed. Personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the

rights and freedoms of the data subject.

6. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.

4 FRAMEWORK STRUCTURE

The policy commitments are delivered through a range of policies and procedures as shown in the chart below and described in the following sections:



5 DATA PROTECTION RISK & IMPACT ASSESSMENTS

The Company has undertaken a number of risk and impact assessments to determine the scope and detail of the policies, procedures, communications and training appropriate for it to meet its obligations under GDPR. More detail on the relevant risk assessments and procedures are described in the Company's Data Protection Procedures, especially Appendix D and Appendix E.

6 SUMMARY OF SLR

This section outlines some of the key issues which need to be addressed in order to ensure compliance with GDPR and how the Company manages its activities in these areas. Where appropriate, reference is made to the elements of the framework which describe the Company's processes in more detail.

6.1 What Personal Data may be collected?

When Personal Data is required, it will only be collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

The type of data which may be collected could include personal information required for recruitment and employment of an individual; contact details for the Company's business development activities; project specific data in order to deliver services and perform contractual agreements; supplier information to allow the Company to purchase goods or services and payment details so money can be received and sent. More detail on what data may be collected is covered in the Company's Data Protection Procedure.

6.2 How is Personal Data collected?

Personal Data may be collected or obtained from different places including:

- directly from the data subject
- from a third party acting on the data subject's behalf e.g. an intermediary or broker
- from publicly available sources
- when the Company generates it itself
- from other organisations.

6.3 How do data subjects give their agreement or refusal for Personal Data to be held and used?

Data subjects are kept informed at all times of the purpose or purposes for which the Company uses their Personal Data. The Company will provide information to data subjects as follows:

- Where personal data is collected directly from data subjects, those data subjects will be informed of its purpose at the time of collection; and
- Where personal data is obtained from a third party, the relevant data subjects will be informed of its purpose:
    a. if the personal data is used to communicate with the data subject, when the first communication is made; or
    b. if the personal data is to be transferred to another party, before that transfer is made; or
    c. as soon as reasonably possible and in any event not more than one month after the personal data is obtained.

Both clients and suppliers are informed through contractual agreements how data will be collected and processed.

Visitors to the Company's website can view the website privacy policy for details on what Personal Data is collected and used. SLR uses cookies to improve the user experience and to provide the Company with information about how its website is used so that it can make sure it is up to date, relevant and error free. Before cookies are placed on a device, a banner will be displayed at the top of the screen requesting the user's consent to set those cookies.

Further details are contained in the Data Protection Procedure.

Employees are provided with details of what Personal Data is held about them through their contract of employment and training. Further details are contained in the Employee Data Protection Procedure.

6.4 How is Personal Data used?

The Company will only use Personal Data for the activities that have been agreed and consented to. Any data provided as part of any working relationship with data subjects will be treated in the strictest confidence and held securely. This is described more fully in the Company's Data Protection Procedure

6.5 How is Personal Data stored and access restricted?

The Company will ensure that all Personal Data collected, held, and processed is kept secure and protected against unauthorised or unlawful processing and against accidental loss, destruction, or damage.

Personal Data is stored on the Company's file servers using industry standard security access systems to restrict access to those staff with a legitimate reason for viewing and processing the data. For Personal Data stored on portable devices data subjects' information is encrypted using industry standard methods.

Where data is stored in a paper form it is stored in locked cabinets.

Personal Data may be transferred to devices belonging to agents, contractors, or other parties working on behalf of the Company where the party in question has agreed to comply fully with the letter and spirit of this framework and of the GDPR (which may include demonstrating to the Company that all suitable technical and organisational measures have been taken).

Details of how this process is controlled are contained in the Company's IT Security and Access Control Procedures.

6.6 For how long is Personal Data retained?

The Company does not keep Personal Data for longer than is necessary in light of the purpose or purposes for which that Personal Data was originally collected, held, and processed.

In most instances, the Company will hold Personal Data for as long as a relationship exists between the Company and the data subject. After the relationship ends, data will be retained where it may be needed for

legitimate purposes – for example, to help respond to queries or complaints, or for other reasons (such as internal project experience and/or, reference projects if the data subject has agreed to allow project details to be shared with other potential clients) and responding to requests from regulators.

Personal data collected from the website is retained in an active processing environment for marketing purposes for a period of three years.

Further detail is contained in the Company's Data Retention Schedule, which is Appendix B of the Data Protection Procedure.

6.7 How is Personal Data removed?

Data subjects have the right at any time to request that the Company erases the Personal Data it holds about them.

When any Personal Data is to be erased or otherwise disposed of for any reason, it is securely deleted and disposed of. Personal data may still exist within an archive or backup media but will not be available for processing.

Unless the Company has reasonable grounds to refuse to erase Personal Data (such as compliance with legal obligations), all requests for erasure shall be complied with, and the data subject informed of the deletion, within one month of receipt of the data subject's request. If additional time is required, the data subject shall be informed.

Further information on the deletion and disposal of Personal Data is included in the Company's Data Retention Schedule, which is Appendix B of the Data Protection Procedure.

6.8 Data Subject Rights and Access requests

Data subjects have a number of rights relating to their Personal Data e.g. to see what is held; to ask for it to be shared with another party; to ask for incorrect or incomplete details to be updated; to object to or restrict processing of it or to make a complaint. Full details are contained in the Data Protection Procedure, Appendix A.

The Company shall enable all of these rights to be fulfilled by allowing data subjects to submit a subject access request (SAR) to find out about Personal Data held by the company; request incorrect or incomplete date is corrected; request their Personal Data is restricted or raise a complaint on how their Personal Data is processed. All SARs received shall be handled by the Company's Data Protection Officer.

More detail on this process and a blank Subject Access Request form are included in the Company's Data Protection Procedure, Appendix C.

6.9 Who can information be shared with?

SLR Group companies may share Personal Data with other companies with whom they work in partnership and with other SLR Group companies. Personal data may also be shared with organisations outside of the SLR

Group e.g. government authorities, sub-contractors or suppliers providing services on the Company's behalf. The data subject's agreement will be obtained if data is to be shared with third-parties.

6.10 How are third party data management systems used?

To maintain and improve site quality and integrity, website usage is tracked by Google Analytics. All data that is tracked is anonymous. The Company uses Google Analytics Demographics and Interest Reporting tools to provide a better understanding of who is visiting the website.

Further detail of the Company's use of third party data management systems is described in the Website Privacy Notice.

6.11 How is data managed if is transferred outside of the EEA?

Data subjects' information may be transferred and stored in countries outside the European Economic Area, including some that may not have laws that provide the same level of protection for personal information. If this is necessary, the Company will comply with section 13 of the Data Protection Policy to ensure that the data subject's rights and freedom in relation to the processing of the relevant Personal Data are protected.

6.12 How are breaches and complaints managed?

The Company has a Data Protection Officer who is responsible for overseeing the implementation of this framework and for monitoring compliance, the Company's other data protection-related policies, GDPR and other applicable data protection legislation. They can be contacted at DataProtection@slrconsulting.com

If a Personal Data breach has occurred the Company will establish the likelihood and severity of the resulting risk to people's rights and freedoms. If it is considered likely that there will be a risk then the UK Information Commissioner's Office (ICO) will be notified. If it is considered unlikely that there will be a risk then the breach will not be reported to the UK ICO.

More details on this process are included in the Company's Data Protection Procedure, Appendix F.

6.13 How are staff made aware of their obligations and how is compliance ensured?

All employment contracts include specific wording relating to Personal Data protection.

Training is delivered to all staff. This includes corporate induction programmes; eLearning and line manager training. Specific system training and awareness programmes are undertaken by staff to enable them to be aware of their responsibilities towards systems and information security.