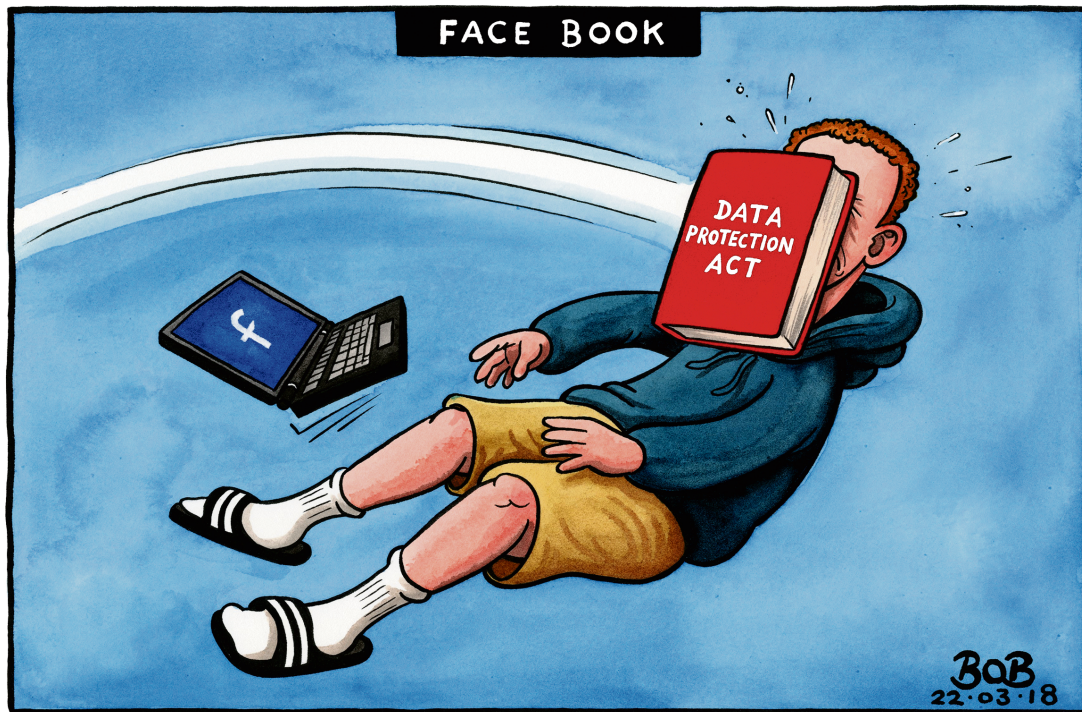


The Action Manager Limited

GDPR - General Data Protection Regulation Policy

31 March 2018



Our GDPR Policy is really simple....it is up to your organisation to comply with the legislation. We provide you with the tools to do so.

Some of our competitors' GDPR Policy can be as long as 30-40 pages. We'd like to think you'll find this policy somewhat easier to deal with.

When you subscribe to TAM you get access to the entire system, but the nominated "TAM Responsible Person" can then determine who can do what on TAM and determine what each employee can see on TAM. In other words, it is up to your organisation to manage the information and how it presented and who has access to it.

You and the individual User control the data that you input on the system. If a User enters, for example, their contact details, Next of Kin, etc., (My TAM > My Details) it is for their own benefit and they implicitly agree to this information being shared or, if they delete this data, it is not kept on TAM. In other words, it is their choice.

That said, there is certain personal information you need to keep on your TAM account (by the way, all this data you have put on TAM is all is owned by you, not us). This includes information such as; names of your employees, their Position, which Department they work in, their training records, Accidents/Incidents they have been involved in and which Sites on TAM they have access to, etc. This is information you need to keep on TAM unless you are happy to be in breach of Health & Safety legislation.

All that said, there is one thing you need to keep an eye on and that is the feature called Special Medical Conditions. These details are entered by the employee and it is there for their own safety. If they have a Special Medical Conditions, but don't enter the details of them, that is their choice. The access to the Special Medical Conditions of staff is tightly

controlled by you. There is a special TAM privilege so that the TAM Responsible Person in your organisation can specify who can access the Special Medical Conditions of a staff member. However, all First Aiders and/or staff responsible for First Aid are automatically given this TAM Privilege. As an additional security measure, anyone accessing a Special Medical Condition will need to specify on TAM why they need to access a Special Medical Condition record and then TAM keeps an audit trail of who accessed the record, when and why so that it can't be abused. If someone does abuse it, we recommend that you consider this an "Act of Gross Misconduct" and deal with it accordingly.

A couple of other things:

- Data is stored in UK
- Data is not available for any purposes other than providing the TAM service
- Data is never provided to any third parties
- Data is backed up to secure on-site and off-site locations
- Data is never stored or processed outside UK