

CHALLENGER

Site Services

Corporate Handbook

This Corporate Handbook contains policies of Challenger Site Services LLP for customers, suppliers and visitors.

Table of Contents

Anti-Corruption Policy.....	3
Anti-Slavery and Human Trafficking Policy	6
Corporate Social Responsibility Policy	7
Customer Complaints Policy	9
Insurance Policy	10
Privacy Policy.....	11
Review Policy	19
Version Control	20

Anti-Corruption Policy

Challenger Site Services LLP is committed to the practice of responsible corporate behaviour and to instilling a strong anti-corruption culture. The Company is also fully committed to compliance with all anti-bribery and anti-corruption legislation including, but not limited to, the Bribery Act 2010 (“the Act”). This includes ensuring that no bribes or other corrupt payments, inducements or collusive arrangements are made, offered, sought or obtained by the Company or anyone working on behalf or in connection with the Company.

This Policy applies to all employees, agents, contractors, sub-contractors, consultants, business partners and any other parties (including individuals, partnerships and corporate bodies) associated with Challenger Site Services LLP.

It is the responsibility of all of the above-mentioned parties to ensure that bribery and collusion are prevented, detected and reported and all such reports should be made in accordance with Challenger Site Services LLP’s Whistleblowing Policy or as otherwise stated in this Policy, as appropriate.

Definitions

Bribery

Bribery is defined as the giving or promising of a financial or other advantage to another party where that advantage is intended to induce the other party to perform a particular function improperly, to reward them for the same, or where the acceptance of that advantage is in itself improper conduct.

Bribery is also deemed to take place if any party requests or agrees to receive a financial or other advantage from another party where that advantage is intended to induce that party to perform a particular function improperly, where the acceptance of that advantage is in itself improper conduct, or where that party acts improperly in anticipation of such advantage.

Bribery of a foreign official is defined as the giving or promising of a financial or other advantage which is intended to influence the official in order to obtain business or an advantage in the conduct of business unless the foreign official is required or permitted by law to be influenced by such advantage.

Collusion

A collusive practice is an arrangement between two or more parties designed to achieve an improper purpose, including influencing improperly the actions of another party.

Conflict of Interest

A conflict of interest is any situation which does, may, or even appears to involve a conflict between personal interests and Challenger Site Services LLP’s interests. Employees must act in the best interests of Challenger Site Services LLP irrespective of potential personal advantages.

Consequences

Any individual or any organisation found guilty of bribery may face fines and/or prison terms. In

addition, high legal costs and adverse publicity are likely to result from any breach of the Act. For employees of Challenger Site Services LLP, failure to comply with this Policy and/or with the Act may result in:

- Disciplinary action which may include dismissal,
- Criminal penalties under the Act which may result in a fine and/or imprisonment for up to 10 years.

For Challenger Site Services LLP, any breach of this Policy by any employee or business associate may result in:

- Challenger Site Services LLP being deemed to be in breach of the Act,
- Challenger Site Services LLP being subject to fines,
- Challenger Site Services LLP suffering negative publicity and further associated damage as a result of such breach.

Rules

No party may:

- Give or promise any financial or other advantage to another party (or use a third party to do the same) on Challenger Site Services LLP's behalf where that advantage is intended to induce the other party to perform a particular function improperly, to reward them for the same, or where the acceptance of that advantage will in itself constitute improper conduct.
- Request or agree to receive any financial or other advantage from another party where that advantage is intended to induce the improper performance of a particular function, where the acceptance of that advantage will in itself constitute improper conduct, or where the recipient intends to act improperly in anticipation of such an advantage.
- Collude with other parties in order to achieve an improper purpose, including improperly influencing the actions of another party specifically in relation to a bid or tendering process.

Parties must:

- Be aware and alert at all times of all bribery risks as described below.
- Exercise due diligence at all times when dealing with third parties on behalf of Challenger Site Services LLP and report any and all concerns relating to bribery or collusion to the relevant person in accordance with Challenger Site Services LLP's Whistleblowing Policy.
- In the case of non-employees, they should contact their normal point of contact within Challenger Site Services LLP, or if that person is implicated, they should contact a member of the Management Team.

Gifts and Hospitality

Gifts and hospitality can, when excessive, constitute a bribe and/or a conflict of interest. Care and due diligence should be exercised at all times when giving or receiving any form of gift or hospitality on behalf of Challenger Site Services LLP.

The following general principles apply:

- Gifts and hospitality may neither be given nor received as rewards, inducements or encouragement for preferential treatment or inappropriate or dishonest conduct.

- Neither gifts nor hospitality should be actively sought or encouraged from any party, nor should the impression be given that the award of any business, custom, contract or similar will be in any way conditional on gifts or hospitality.
- Cash should be neither given nor received as a gift under any circumstances.
- Gifts and hospitality to or from relevant parties should be generally avoided at the time of contracts being tendered or awarded.
- The value of all gifts and hospitality, whether given or received, should be proportionate to the matter to which they relate and should not be unusually high or generous when compared to prevailing practices in our industry or sector.
- Certain gifts which would otherwise be in breach of this Policy may be accepted if refusal would cause significant and/or cultural offence, however Challenger Site Services LLP will donate any gifts accepted for such reasons to a charity of its choosing.

Political Donations

Challenger Site Services LLP does not make political donations and is not affiliated with any political party, independent candidate, or with any other organisation whose activities are primarily political.

Employees and other associated parties are free to make personal donations provided such payments are not purported to be made on behalf of Challenger Site Services LLP and are not made to obtain any form of advantage in any business transaction.

Anti-Slavery and Human Trafficking Policy

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

Challenger Site Services LLP strictly prohibits the use of modern slavery and human trafficking in its operations. The company have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within the organisation.

This policy applies to all persons working for Challenger Site Services LLP.

Challenger Site Services LLP is committed to ensuring that the following measures are supported and upheld in order to safeguard against modern slavery:

- Challenger Site Services LLP has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all business dealings and relationships.
- The prevention, detection, and reporting of modern slavery in any part of the company is the responsibility of all employees.
- Employees must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- All employees of Challenger Site Services LLP have a contract of employment including written Terms and Conditions of Employment and have not had to pay any fees to obtain work.
- All employees are legally able to work in the UK and are in possession of legal documents to confirm this such as passport and/or UK bank account and National Insurance Number.
- All employees are aware of their statutory rights, including sick pay and holiday pay.
- All employee addresses are obtained to ensure there are no suspicions of exploitation (a large number of employees listing the same address may indicate high shared occupancy, often a factor for those being exploited.)
- Challenger Site Services LLP assesses quotations and fees from subcontractors, suppliers and agencies charging suspiciously low rates against standard industry pricing.

Corporate Social Responsibility Policy

Challenger Site Services LLP, as a member of the business community, recognises its corporate social responsibility commitments in its various roles.

'As a responsible business we believe that the long-term future of the business is best served by respecting the interests of all our stakeholders: employees, customers, suppliers and the wider community. We look actively for opportunities to improve the environment and to contribute to the wellbeing of the communities in which we trade.' Robert Allen, Partner at Challenger Site Services LLP

The Partners have primary responsibility for the implementation of this Policy; however, other stakeholders, particularly employees, are invited to provide feedback on the nature and operation of this Policy.

To provide a reference point to guide stakeholders, employees and customers on the values which drive the conduct of our business and relationships with the world in which we operate, the following values shape the decision making process.

Long Term Decision Making

Decisions are made with one eye on the future and the Company is committed to work to improve our performance. Technical developments, changing scientific evidence, costs, and customer concerns and expectations are all considered in the development and implementation of all new social and environmental policies and procedures.

Employees

The Company is guided by its aim to be the employer of choice in all communities in which it operates. The Company strives to be a diverse and inclusive with strong levels of employee engagement.

Challenger Site Services LLP encourages employee feedback and involvement in business practices and is committed to training and upskilling its workforce.

Suppliers and Customers

The Company depends upon its customers. Every employee is responsible for ensuring that any contact with customers and the public at large reflects the Company's values of professionalism, integrity, efficiency and honesty, as part of a constant strive to provide high quality service, equipment and products of good value for money.

Suppliers of Challenger Site Services LLP are regarded as partners to help the Company achieve its aspirations in the delivery of its products and services. All Company suppliers are carefully selected to ensure they share the Company values.

Community and Environment

Challenger Site Services LLP is committed to being a responsible corporate body through support for appropriate non-political and non-sectarian projects, organisations and charities. The Company will

build relationships with its customers, suppliers and the local communities which it serves by encouraging employees to consider the needs of others.

The Company will continually seek a wide range of views on its social and environmental policies and performance from employees, customers, suppliers and other stakeholders.

Challenger Site Services LLP is committed to a programme of management, continuous improvement and reporting of the Company's direct and indirect impacts, which marks its contribution to improving the world in which it exists.

The Company recognises that its activities have direct and indirect impacts on the societies in which it operates. It endeavours to manage these in a responsible manner, affirming that sound and demonstrable performance in relation to corporate social responsibility policies and practices is a fundamental part of business success.

Reputation

The Company is committed to ensuring that its activities are conducted according to rigorous ethical, professional and legal standards. Challenger Site Services LLP will continue to maintain and develop various standards by sustaining and increasing its portfolio of accreditations. In doing this, the Company's values under this Policy will be reinforced, creating a stronger reputation of corporate social responsibility and cementing the Company's reputation as an industry leader.

Fairness and Equality

Challenger Site Services LLP respects the Universal Declaration of Human Rights and European Convention of Human Rights and seeks to be guided by its provisions in the conduct of our business.

Social and environmental responsibility involves everyone, and Challenger Site Services LLP's structure means that employees share the responsibilities of ownership as well as its rewards. The Company aims to develop and implement social and environmental policies which fit in with the everyday activities and responsibilities of all of its stakeholders to ensure that fairness and equality becomes commonplace not just at Challenger Site Services LLP, but across the industry.

Customer Complaints Policy

Challenger Site Services LLP recognises the need for a formal customer complaints policy. Whilst the Company aims for 100% customer satisfaction, it recognises that sometimes customers or members or the public may have cause for complaint.

Minor complaints may be dealt with informally directly with the complainant. Informally dealing with complaints at this stage is of benefit to both Challenger Site Services LLP and the complainant: complaints may be resolved quickly and efficiently for the complainant without the need for a lengthy formal investigation. By dealing with minor complaints in this way, the Company is able to engage directly with its customers and strengthen relations by providing effective remedies quickly and efficiently.

Complaints that cannot be dealt with informally are dealt with using a formal investigation procedure using a Customer Complaint Investigation Form; a full investigation is conducted taking into account a range of evidence including details from the complainant, evidence from vehicle tracking and testimony from the employee involved in the complaint (if applicable). After the investigation a conclusion is drawn and any action points are documented on the form to prevent reoccurrence. Formal complaints are recorded.

Insurance Policy

Challenger Site Services LLP is committed to fulfilling its obligations for being adequately insured for the purposes for which it operates. This includes public liability insurance, employer's liability insurance, product liability insurance and vehicle fleet insurance.

Insurance is managed by the Company's external Insurance Broker, who deals with renewals, claims and investigations. Regular informal meetings and annual renewal meetings are held between the Broker and Company Partners.

All insurance claims are recorded.

See the Infractions, Fines and Charges Policy and the Accidents, Incidents and Theft Policy in the Drivers Handbook for further detail on the recording and investigating of incidents.

Privacy Policy

Challenger Site Services LLP is committed to protecting the privacy of all personal information collected in the course of business, as a result all security measures in place to protect the Company's network and computer systems will supersede any conflicting business priorities. Challenger Site Services LLP complies with all data protection laws applicable to the United Kingdom to protect the company and the individuals involved.

This privacy policy explains how and why personal information is collected; who the information is shared with, why and on what basis; and what rights a person has with regards to their personal information.

This privacy policy applies to personal information about:

- Visitors to the website - <https://www.challenger-site-services.co.uk>.
- Customers who purchase goods or services from Challenger Site Services LLP
- Suppliers who supply goods or services to Challenger Site Services LLP
- Members of the public who have contacted Challenger Site Services LLP

Personal information is any information that could be used (directly or indirectly) to identify a person. That could be anything from a name and address, bank details, email address, an image or recording, IP address or any other information that could be used to identify someone.

Personal information may include "special category data" relating to racial or ethnic origin, political opinions, religious beliefs, membership of a trade union, physical or mental health and criminal records and allegations. As a rule, "special category data" is not collected. The exception is where suspected criminal activity is identified such as use of stolen payment card details. In this case, details of the suspected criminal activity will be recorded, and appropriate action may be taken, including refusing to accept orders, make payments or give refunds. The incident may also be reported to the relevant bank or payment card issuer or to the police or other appropriate authority.

Processing simply means doing something with personal information. That could be as straightforward as collecting it or sharing it, or as complex as modelling the information or appending values to the information.

Data Controller

Challenger Site Services LLP is a data controller and as such is responsible for determining what happens to any personal information collected and how it is processed. Responsibilities also include monitoring and approving any data processors that the information is passed to.

Data Processor

Challenger Site Services LLP use data processors to provide personal information processing services. A data processor carries out processing on behalf of the data controller. As an example, Challenger Site Services LLP (the data controller) may ask another company (the data processor) to send emails to customers. As a result, the data controller will provide the data processor with the personal information required to carry out this request.

Legal Basis

Some of the personal information collected is provided voluntarily (and therefore with permission), for example when signing up to join a mailing list or submitting a query.

If products or services are purchased or supplied, most of the information collected is necessary for the fulfilment of the contract between Challenger Site Services LLP and its customer/supplier.

The remainder of the information is collected for legitimate business purposes, which include:

- To keep in touch with current, past and prospective customers
- To manage the relationship with customers and suppliers
- To gain an understanding of customer interaction to provide the most relevant products and services
- To monitor the use of the website, provide a more personalised online experience and improve its facilities
- To identify suspected criminal activity and take appropriate action

Personal information may also be used in order to meet legal or regulatory obligations that Challenger Site Services LLP may be subject to.

The Information Collected

Challenger Site Services LLP may use the personal information collected from people who have previously signed up to a mailing list or have previously enquired or purchased products or services to let them know about similar products or services which may be of interest to them and to keep them updated with information about promotional offers.

Email or text marketing can be opted out of at any time by using the unsubscribe option in the message. Postal and/or telephone marketing can be opted out of at any time by contacting us at the address at the end of the policy.

Customers:

If products or services are purchased or enquiries are made, personal information will be collected and stored on a secure centralised database and may be used in the following ways:

- to respond to enquiries;
- to keep customers informed about our products and services;
- to process orders and to follow up on orders that are not completed;
- to process initial and ongoing payments for orders;
- to manage deliveries and collections;
- to manage a customer's account or credit account if applicable including carrying out credit/trade references;
- for market research purposes;
- to track activity on the website and to provide a more personalised online experience;
- to link with social media sites and services
- to notify customers about important changes or developments to the website or services;
- to deal with enquiries and complaints;
- for claims management and insurance purposes;
- for record keeping purposes; and
- for testimonials.

Suppliers:

If products or services are supplied, personal information will be collected and stored on a secure centralised database and may be used in the following ways:

- for order processing and management;
- to manage deliveries/collections, installations, returns and refunds;
- to manage a Supplier's account, including conducting credit, trade and other background checks where applicable;
- for market research purposes;
- to notify Suppliers about important changes or developments to the website or services;
- for supply chain management;
- to deal with enquiries and complaints;
- for claims management and insurance purposes; and

- for record keeping purposes.

Members of the public

If contact is made with members of the public, personal information will be collected and stored on a secure centralised database and may be used in the following ways:

- to deal with enquiries and complaints; and
- for claims management and insurance purposes

Call Monitoring

Telephone calls may be monitored for the following purposes:

- training and quality control; and/or
- as evidence of conversations.

CCTV

CCTV systems are used within the offices, workshop and yard area for the safety and security of the staff, buildings, assets and information located or stored on the premises and will not be used for any other purpose without prior consultation of the Partners.

The CCTV System may be used to:

- Investigate security incidents in order to secure evidence, should such incidents occur.
- Monitor the progress of staff or individuals in the ordinary course of lawful business in the area under surveillance.
- Observe staff working practices, time keeping or to assist in the day-to-day management of staff.
- Capture images for training purposes.
- In exceptional circumstances, where it is considered appropriate, the CCTV system may be used to visually monitor the health and/or behaviour of the staff.

Challenger Site Services LLP is committed to respecting people's rights to privacy and supports the individual's entitlement to go about their lawful business, although there will inevitably be some loss of privacy when CCTV cameras are installed and so it is crucial that serious consideration is given to the necessity for cameras in a given location. It is also essential that CCTV equipment is sited in such a way that it only monitors those areas intended to be covered. If it is not possible to restrict coverage, the owner of a property or space being overlooked should be consulted. Cameras are not to be installed in such a way that they can look into private space such as toilets.

It is essential that legible 'CCTV Recording in Use' signs are displayed in a prominent place where CCTV is in use and only where it is in use (except where 'covert' cameras have been authorised for deployment). The signs will act as an additional deterrent. All signs of this nature should have a yellow background with all writing in clear black print and should contain the following information:

- Identify Challenger Site Services LLP as responsible for the surveillance,
- Purpose of the surveillance,
- Contact details,
- An image of a camera.

CCTV recordings are only to be reviewed by Company Partners. Images provided to the Police or other enforcement agencies or for internal investigations shall at no time be used for anything other than the purposes for which they were originally released. All images will remain the property and copyright of Challenger Site Services LLP. All media will be disposed of securely when no longer required.

Website and Social Media:

Visitors to the website and Challenger Site Services LLP social media platforms may choose to provide contact details (name, address, email address, telephone number) for any of the following reasons:

- Signing up to a mailing list
- Submitting a query or requesting a quote or other information
- Contacting Challenger Site Services LLP or requesting contact to be made
- Blog comments
- Testimonials
- Social media posts

Website Cookies:

The website can be visited and browsed without providing a name or contact details, however, like many websites, cookies are used to analyse how the site is used by visitors and to provide a more personalised online experience.

Cookies are a standard feature of most websites and allow small amounts of data to be stored on a computer. Cookies provide the following benefits;

- Determine whether the website has previously been visited or not.
- Make it easier to maintain preferences and enable certain features of the website to work.
- Tailor the information or adverts shown on the website
- Insights into which areas of the website are useful and which areas need improvement.

There are three different types of cookies:

- Session cookies: these are mainly used by online shops and allow visitors to keep items in their basket when shopping online. These cookies expire when the browser is closed
- Permanent cookies: these are kept even when the browser is closed and saved on the computer for up to 6 months. They are used to remember each visitor's preferences from one visit to the next.
- Third-party cookies: these are installed by third parties with the aim of collecting certain information to carry out various research into behaviour, demographics etc.

Details of the cookies used on the website are:

- Essential cookies - Used to perform a variety of functions in order to make sure the information is displayed correctly on the website and records whether or not additional cookies have been accepted
- Analytics cookies - Google Analytics is used to assess how visitors use the website, to understand how users arrived at the website, to monitor how long they remained on the website, when they returned and to control website traffic at busy times. These cookies use anonymous information only and are deleted after 26 months.
- Functionality cookies - Used to enable certain features of the website work such as email services, surveys, live chat features, contact forms, google maps and video.

Accepting cookies is a choice and this decision can be made and changed at any time using the settings on the web browser. However, disabling cookies, can diminish the website experience and prevent features from working as intended. For details on how to accept, block and delete cookies you can use the "help" feature on the web browser or visit <http://www.allaboutcookies.org/>. To opt-out of Google Analytics for the web, visit the [Google Analytics opt-out page](#) to install the Google Analytics opt-out add-on for your browser.

Security

Challenger Site Services LLP is committed to safeguarding personal information that is provided in the course of business. Employees handling personal information should ensure that they:

- Keep passwords and accounts secure.
- Do not install software or hardware, including modems and wireless access without explicit approval from a Company Partner.
- Report any suspicious behaviour and/or breaches of this policy to a Company Partner without delay.
- Exercise good judgment regarding the reasonableness of personal use of IT equipment.

- Take all necessary steps to prevent unauthorised access to confidential data.
- Special care should be exercised when using information contained on portable computers.

All employees must sign a 'Confidentiality Agreement', which prohibits them from making any material available for purposes other than those stated in this Policy. Once signed, the Confidentiality Statement will be placed in the persons Personnel file.

Physical Security

Access to sensitive information in both hard and soft media format must be physically restricted to prevent unauthorised individuals from obtaining sensitive data.

- Visitors must always be escorted by a trusted employee when in areas that hold confidential data and information.
- A schedule of devices should be maintained. The list should include make, model, serial number and location of the device.
- Personnel using the devices should report suspicious behaviour and indications of tampering of the devices to a Company Partner without delay.

Network Security

A high-level network diagram of the network is maintained and reviewed on a yearly basis and can be found in the Office Handbook. Other forms of network security in place are;

- The allocation of privilege rights shall be restricted and controlled, and authorisation provided jointly by the system owner and IT Services.
- Access to confidential information will be limited to authorised persons whose job responsibilities require it.
- No external access for remote users shall be permitted to any network device or networked system without prior authorisation from a Company Partner.
- All data must be securely disposed of when no longer required by Challenger Site Services LLP, regardless of the media or application type on which it is stored.
- Challenger Site Services LLP will arrange for the destruction of hardcopy materials.
- Bulk download of personal information is not possible via Challenger Site Services LLP centralised IT systems without administrator access. All documents and files that are backed-up are encrypted.

Cardholder Security

Challenger Site Services LLP uses a PCI-compliant virtual terminal to process card payments; this reduces the risk of a security breach as no cardholder details are stored on local machines.

In order to prevent a breach of cardholder data or sensitive cardholder information Challenger Site Services LLP and its employees will ensure:

- All sensitive cardholder data stored and handled by Challenger Site Services LLP and its employees must be securely protected against unauthorised use at all times.
- Any display of the cardholder should be restricted at a minimum to the first 6 and the last 4 digits of the cardholder data.
- All sensitive cardholder data must be protected securely if it is to be transmitted. Cardholder data must never be sent over the internet via email, instant chat or any other end user technologies.
- All hard copies of cardholder data must be manually destroyed when no longer required for valid and justified business reasons.
- All cardholder information awaiting destruction must be held in lockable storage containers clearly marked - access to these containers must be restricted.

It is also strictly prohibited to store:

- The contents of the payment card magnetic stripe (track data) on any media whatsoever.

- The CVV/CVC on any media whatsoever.
- The PIN or the encrypted PIN Block under any circumstance.

Website

Appropriate measures are used to protect the information that is submitted through the website as well as the information collected and stored about customers. Unfortunately, the transmission of information via the internet is not completely secure. Although personal information will be protected as much as possible, the security of information submitted via the website cannot be guaranteed. Any transmission is done so at the risk to the individual.

Once the information has been received, appropriate and a generally accepted standard of technology and operational security has been implemented to safeguard personal information against loss, theft and unauthorised use, access or modification. In the event of any breach which might expose a person to a serious risk, they will be notified promptly.

Links may be provided on the website to other websites that are not operated by Challenger Site Services LLP. Use of these links, will result in leaving the website. Challenger Site Services LLP are not responsible for the contents of any third-party website.

Disclosure

Like most organisations, Challenger Site Services LLP engage service providers to run the website and IT systems, conduct credit/trade reference checks, perform debt collection and handle marketing campaigns. A number of suppliers also provide products and delivery services to/for Challenger Site Services LLP.

These companies will only be provided with the information they need to deliver the service they have been engaged for and are prohibited from using that information for any other purpose.

Whenever personal information about customers, suppliers or visitors to the website is shared with service providers, agreements will be put in place which require the service provider to protect the information and keep it secure.

Some of the companies who provide services to Challenger Site Services LLP may be located outside the United Kingdom; Marketing service providers who are located in the United States, for example. As a result, personal information may be transferred outside the UK.

Challenger Site Services LLP will ensure that those service providers comply with any legal requirements that apply to the transfer of personal information outside the UK, including, where appropriate, requiring the service provider to sign the approved European Commission Standard Contractual Clauses for the transfer of personal information to third countries.

Personal information may also be disclosed to the following third parties for the purposes described above:

- Tax, customs and excise authorities
- Regulators, courts and the police
- Fraud screening agencies
- Central and local government
- Insurance companies
- Other professional advisors

Challenger Site Services LLP may also disclose personal information if it is believed that the disclosure is necessary to enforce or apply its terms and conditions or otherwise protect and defend its rights, property or the safety of its customers and other users of the website.

Challenger Site Services LLP may disclose and/or transfer personal information in connection with the sale of any part of the business or assets.

Breach Procedure

If a breach were to take place the following procedure should be carried out by a Company Partner:

- Ensure the compromised system is isolated from the network.
- Investigate the incident.
 - Gather, review and analyse the logs and related information.
 - Conduct appropriate forensic analysis of compromised system.
 - Make findings available to and assist appropriate law enforcement or card industry security personnel.
- Resolve the problem to the satisfaction of all parties involved, including reporting the incident and findings to the appropriate parties as necessary, which could include:
 - Merchant provider card brands.
 - Internet service provider.
 - Insurance carrier.
 - Card providers.
- The Partner will determine if policies and processes need to be updated to avoid a similar incident in the future, and whether additional safeguards are required in the environment where the incident occurred.

Retention

Challenger Site Services LLP will retain the minimum amount of personal information for no longer time than is necessary for the legitimate business purposes described above. Information from website visitor enquiries will be retained for a limited period in order to respond to any queries, provide information and send updates on products and services unless these communications are opted out of. Information may be retained for longer if there are valid legal grounds to do so, for example if required by law or court order, or as needed to defend or pursue legal claims.

Changes to this policy

Challenger Site Services LLP reserve the right to amend this policy from time to time without prior notice. Regular review of the website is advised to stay informed of any changes.

Your Rights

The following rights are given to a person in relation to personal information:

- The right to be informed by way of this policy
- The right to correct or update any personal information held by Challenger Site Services LLP.
- In certain circumstances, to restrict or object to the processing of personal information, or request that personal information is deleted
- Where personal information has been provided voluntarily, or otherwise consented to its use, the right to withdraw consent
- In certain circumstances, the right to receive a copy of the personal information which has been provided to us, in a structured, commonly used and machine-readable format or to request that the information is transferred to another party (known as “data portability”)
- the right to complain to a Data Protection Authority (see further below)

Questions, requests for additional information or requests to exercise the rights of a person may require identification and should be made to Robert Allen by writing to:

Challenger Site Services LLP
50 Winton Street
Ashton-Under-Lyne
Lancashire
OL6 8NL

sales@challenger-site-services.co.uk
0161 344 2581

If the use of personal information or the response to questions or requests regarding personal information is unsatisfactory, a person has a right to complain to the Information Commissioner.

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

<https://ico.org.uk/concerns/>
0303 123 1113.

Review Policy

Challenger Site Services LLP understands the need to conduct regular internal reviews of policies, procedures and compliance in order to adapt to changes in the industry and maintain best practice.

Reviews are conducted at regular intervals or after significant changes in the business.

In addition, an annual review will be conducted which includes, but is not limited to, a review of:

- Professional accreditation compliance.
- Vehicle inspection and maintenance arrangements.
- Health and safety.
- Yard movements.
- Tyre and fuel use.
- Complaints, incidents and infractions.
- Driving standards.
- Operational requirements.
- Training requirements

Reviews will be undertaken by a Partner and discussed at a meeting with the Management Team.

Version Control