# Servus Limited Client & Vendor Personal Data Privacy Policy



Doc no.: DPP-002 Reviewed by: Adesh Ramdeen Issue date: 22-05-2018

#### Servus Limited's commitment to protecting your personal data

At Servus Limited (henceforth also referred to as "we", "us", our"), your privacy is important to us. To better protect your privacy we provide this policy explaining our data collection, processing and security practices, and the choices you can make about the way your personal data is collected and used. To make this notice easy to find, we make it available on our homepage and at every point where we may request personal data from you.

### What personal data is collected, how it is collected and how is it used:

Servus Limited collects certain personally identifiable data about natural persons that can be used to contact or identify them. Personally identifiable data may include, but is not limited to a name, email address, national identification number or contact number.

Types of data collected	How this data is collected	How this data Is used
Client Personal Data: Names, addresses, email addresses, contact numbers, job title.	<ul> <li>Through contract tendering and award processes</li> <li>Through general market research (website lookups etc.)</li> </ul>	<ul> <li>This data is used for the purposes of account administration for all users of our Computerised Maintenance Management System (CMMS). This enables Servus Limited to provide its employees and clients with online services for Service Request, Preventive Maintenance, Asset Management and Reporting features on a globally available web-based platform as required.</li> <li>This information is also used for Client account administration for Financial/Accounting purposes.</li> <li>Used for financial audits.</li> <li>Contract Management Purposes</li> <li>This information is also used for general correspondence/communication between Servus Limited and its employees and/or business associates. Correspondence here may encompass marketing of products/services that Servus Limited offers.</li> </ul>
Vendor Personal Data: Names, addresses, email addresses, contact numbers, job title.	<ul> <li>Through the vendor registration process.</li> <li>Through general business correspondence.</li> <li>Through general marketing (solicited and unsolicited) that vendors sometimes push to Servus via various media.</li> </ul>	<ul> <li>This data is used for general correspondence between Servus and vendors for legitimate business purposes.</li> <li>This data is also used for contract management purposes.</li> <li>Vendor Registration requires that this data be provided for the creation and administration of a vendor record.</li> <li>This data is required for the execution of Servus' procurement processes.</li> </ul>

#### How we may share this personal data:

Servus Limited shares personal data only when required to conduct legitimate business transactions between itself and its clients, potential clients and vendors, and does not do so if sharing this information would constitute a conflict of interest. For example, in a tendering process, we may provide non-sensitive personal information about our employees as part of the tendering process). We do not share

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personal data with entities that do not presently have any type of contractual employment or business relationship with the Servus Limited, or with which Servus Limited is not engaged in a tendering/bidding process for new business. Exceptions to this would be in circumstances where there exists a legal and/or statutory request to do so; for example a law, regulation, warrant, subpoena, court order or statutory auditing requirements (financial and otherwise). This may include responding to legal requests from jurisdictions outside of Trinidad & Tobago where we have a good faith belief that the response is required by law in that jurisdiction, affects users in that jurisdiction, and is consistent with internationally recognized standards. We may also access, preserve and share information when we have a good faith belief it is necessary to: detect, prevent and address fraud and other illegal activity; to protect ourselves, you and others, including as part of investigations; or to prevent death or imminent bodily harm. For example, we may provide information to third-party partners about the reliability of your account to prevent fraud and abuse on and off of our Services. Outside of this, personal data stored on the CMMS platform conforms to the relevant section(s) of the platform vendor's data privacy policy.

#### Our retention period for personal data:

We will retain personal data for at least as long as is required to satisfy our local legal and contractual obligations or where we otherwise reasonably believe we have a legitimate reason for doing so.

### Data Security measures/processes in place at Servus:

The security of personal data is important to us. Servus Limited strives to prevent unauthorised access, maintain data accuracy, and ensure the correct use of data. Only authorized administrators and staff have access to systems containing such data. We have adopted the ISO/IEC 27001 standard to identify and implement appropriate physical, electronic, and managerial procedures and controls to safeguard and secure the personal data that we collect, store and process. While we strive to use commercially acceptable means to protect your personal data, we cannot guarantee its absolute security.

#### Access, correction and deletion of personal data:

Servus Limited respects your data privacy rights, and as such, will provide reasonable access to your personal data that you may have provided through various data collection means. To access or amend any of your personal data that we have recorded, or to request its deletion, you may contact us through the channels detailed in the "Contact Information" section of this policy. Note that any personal data which the company holds to fulfil legal obligations will be held for the minimum mandatory retention period as defined under Trinidad & Tobago law and as such, requests for access, amendment or deletion of personal data in contradiction of the statutory requirements of the law would not be entertained. You may decline to share certain personal data with us, in which case we may not be able to provide you with some of the services we offer. To protect your privacy and security, we will also take reasonable steps to verify your identity before granting access or making corrections.

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### **Changes to the Privacy Policy**

This Privacy Policy is effective as of May 24<sup>th</sup>, 2018 and will remain in effect except with respect to any changes in its provisions in the future, which will be circulated as soon as they come into effect. We reserve the right to update or change our Privacy Policy at any time without any notice to you and we therefore encourage that you should check this Privacy Policy periodically.

#### **Contact Information**

Should you have other questions or concerns about these privacy policies, please email <a href="mailto:servus.co.tt">servus it@servus.co.tt</a> or <a href="mailto:servus.co.tt">service@servus.co.tt</a>. Please direct any queries concerning this policy through these channels and the appropriate resource will respond.