

# Privacy Policy

*May 2018*



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CDC Group respects your privacy. This privacy policy (the **policy**) describes how we process personal data, which personal data we collect and why we collect it, with whom we share this personal data, how we protect it, and the choices you can make about how we use your personal data.

This policy applies to any personal data collected, held or processed by or on behalf of CDC Group plc, its affiliated companies and subsidiaries (hereinafter together referred to as **CDC**) relating to any individual in their dealings with CDC.

The scope of this policy also includes all the websites, applications, mobile sites, and social media platforms that are owned by CDC, where personal data is processed. If you chose not to provide us with your personal information, in most cases, we will not be able to provide you with our services or information about them

CDC may amend this policy at any point in time. Please check this policy periodically at [cdcgroup.com](http://cdcgroup.com) to inform yourself of any changes.

## 1. Definitions

In this Policy, the following terms shall have the following meanings:

- ✦ **CDC** means CDC Group plc, its affiliated companies and subsidiaries.
- ✦ **Controller** means the organisation which determines the purposes for which, and the way, any personal data is processed. For the purposes of this policy, the controller(s) are CDC and each of the CDC group companies listed in Appendix A.
- ✦ **Data Protection Officer or DPO** means the data protection officer appointed by CDC in the relevant jurisdiction.
- ✦ **Data subjects** means all individuals about whom CDC holds personal data.
- ✦ **Personal data** is any data relating to a living individual which allows the individual to be identified, whether from the data alone, or in combination with other information.
- ✦ **Processing** means any operation or set of operations which is performed upon personal data, such as the collection, recording, organization, storage, adaption or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction of personal data.
- ✦ **Processor** means the individual and/or organisation which processes personal data on behalf of the Controller.
- ✦ **Sensitive personal data** means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, data concerning health, sexual orientation or sex life. Special provisions apply to the processing of sensitive personal data.

## 2. Key policy principles

We value the personal data entrusted to us and we are committed to processing personal data in a fair, transparent and secure way. The key principles of this policy are as follows:

- ✦ **Data collection:** we will only collect personal data by fair, lawful and transparent means.
- ✦ **Data minimisation:** we will limit the collection of personal data to what is directly relevant and necessary for the purposes set out in this policy.
- ✦ **Purpose limitation:** we will only process your personal data for specified, explicit and legitimate purposes and not further process your personal data in a way incompatible with those purposes.

- ✦ **Accuracy:** we will keep your personal data accurate and up to date.
- ✦ **Data security:** we will implement appropriate technical and organisational measures to ensure an appropriate level of security in relation to the risks represented by the processing and the nature of the personal data to be protected. Such measures provide for the prevention of any unauthorised disclosure or access, accidental or unlawful destruction or accidental loss, or alteration and any other unlawful form of processing.
- ✦ **Access and rectification:** we will process your personal data in line with your privacy rights.
- ✦ **Retention:** we will retain your personal data in a manner consistent with the applicable data protection laws and regulations. In any event, we will not keep your personal data longer than is necessary for the purposes set out in this policy.
- ✦ **International transfers:** we will ensure that any personal data transferred outside the European Union (EU) is adequately protected.
- ✦ **Third parties:** we will ensure that access to and transfers of personal data to third parties are carried out in accordance with the applicable laws and regulations and with suitable contractual safeguards.
- ✦ **Direct communications and cookies:** where we send you information or place cookies on your computer, we will ensure that we do so in accordance with the applicable laws.

### 3. How we collect and use your information

#### *3.1 Visitors to our websites*

We collect IP addresses, cookies, moments of connection from visitors to our websites, which are analysed by Google Analytics, who collect standard internet log information and details of visitor behaviour patterns. We do this to identify the number of visitors to the various sections of the site. This information is not used to identify anyone.

Both CDC and Google do not make any attempt to discover the identities of visitors to our website.

For further information about our use of cookies and on how to decline them, please consult our [cookie policy](#).

#### *3.1.1 Newsletters*

We will collect your name and email address if you choose to subscribe to our newsletter. We use a third party provider, Mailchimp, to deliver our monthly e-newsletters. We gather statistics around email opening and clicks using industry standard technologies including clear gifs to help us monitor and improve our e-newsletter. For more information, please see:

[Mailchimp terms and conditions](#)

[Mailchimp privacy policy](#)

#### *3.1.2 General enquiries*

When you submit an enquiry, we will collect your: email address and comments, we will also collect your first name, surname and the nature of the request if you choose to provide us with this information. Where enquiries are submitted to us we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of service we provide.

### *3.1.3 Events*

The information you provide will be used to process your event booking. We will also use it to contact you via Eventbrite regarding your booking. We may also contact you to undertake post-event evaluation.

Please note that Eventbrite is a third-party service that is not owned or managed by CDC. For more information, please see:

[Eventbrite terms and conditions](#)

[Eventbrite privacy policy](#)

### *3.1.4 Investment proposals*

When you submit an investment proposal, we will collect your: first name, surname, email address, comments and any attached documents you choose to provide us with. We will only use the information supplied to us to review the proposal, interact with the submitter throughout the review process, and to provide a final response.

### *3.2 People who participate in our surveys*

We may contact you to participate in optional surveys from time to time. We will only do this if we have your consent or a legitimate and lawful basis to do so. We use a third-party provider, Survey Monkey to deliver, manage and produce reports relating to the survey. We may collect names, contact details and other information relevant to the survey. We will be transparent when we collect personal data through our surveys and will explain the purposes for which we are collecting it.

### *3.3 People who call our contact points*

When you call CDC, we collect Calling Line Identification (CLI) information which may include your telephone number. We use this information to help improve our efficiency and effectiveness. We do not record phone conversations.

### *3.4 People who email us*

When you send an email address to us we may collect your IP address, email address and other data you have provided within the email or attachments. The information will only be used to address the purposes of your request, it will be recorded in our email and email security systems and may be recorded in a ticketing system to manage and respond to the request.

We use Transport Layer Security (TLS) to encrypt and protect email traffic in line with security best practices. If your email service does not support TLS, you should be aware that any emails we send or receive may not be protected in transit.

We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

### *3.5 People who make a complaint to us*

When we receive a complaint from a person we create a file containing the details of the complaint. This normally contains the identity (name, contact details, address, alias etc.) of the person making the complaint and any other individuals involved in the complaint.

We will only use the personal information we collect to handle the complaint and to check on the level of service we provide.

We may have to disclose the person who submitted the complaint's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute.

If the person who submitted the complaint doesn't want information identifying them to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

We will keep personal information contained in complaint files in line with our record and retention policy. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

### *3.6 Identity data and verification of identity*

In some instances, we will need to verify your identity (e.g. access requests, know your customer (KYC), or for other screening purposes). We will always be transparent and explain the purposes for collecting identity data from you prior to processing.

Identity data can include: IDs assigned by us, passport, driving license, or a copy of ID (passport, driver's licence or comparable identity document), utility bills.

This data will only be used for verification of identity relating to the purposes it was requested for.

### *3.7 Use of personal data for direct communication purposes*

We will only use your personal data to send communications via electronic means (e.g. email, SMS or MMS) if we have obtained your prior consent or have a legitimate and lawful interest to do so. You can withdraw your consent or object to communications at any point in time, by following the unsubscribe instructions included in the communications or by contacting the DPO at [dataprotection@cdcgroupp.com](mailto:dataprotection@cdcgroupp.com).

### *3.8 Photos and videos at CDC events*

At special events organised by CDC we may take – with your permission – photos and videos of you. This includes image recordings such as films, photographs, video recordings, digital photos.

### *3.9 Personal data we receive from third parties*

We may obtain the same categories of personal data about you from third parties, other CDC group companies, carefully selected business partners who provide services on behalf of us, and any other third party who may lawfully pass to us information about you.

### *3.10 Personal data collected through the recruitment process*

We will collect various information from you through our recruitment process. This is detailed below:

### *3.10.1 Application*

If you use CDC's online application system, this will be collected by Access UK Limited (changeworknow.co.uk), as processor on CDC's behalf, please see:

[Changeworknow.co.uk Privacy Policy](#)

We will ask you for your personal details including name and contact details. We will also ask you about your previous experience, education, referees and for answers to questions relevant to the role you have applied for. Our recruitment team will have access to all this information.

You will also be asked to provide equal opportunities information. This is not mandatory information – if you don't provide it, it will not affect your application. This information will not be made available to any staff outside of our recruitment team, including hiring managers, in a way which can identify you. Any information you do provide, will be used only to produce and monitor equal opportunities statistics.

### *3.10.2 References*

When providing references via our online reference system these will be collected by a processor called Xref on our behalf, please see:

[Xref Privacy Policy](#)

### *3.10.3 Shortlisting*

Our hiring managers shortlist applications for interview. They will not be provided with your name or contact details or with your equal opportunities information if you have provided it.

### *3.10.4 Assessments*

We might ask you to participate in assessment days, complete tests or complete occupational questionnaires, and/or to attend an interview – or a combination of these. Information will be generated by you and by us. For example, you might complete a written test or we might take interview notes. This information is held by the CDC.

If you are unsuccessful following assessment for the position you have applied for, we may ask if you would like your details to be retained in our talent pool for a period of six months. If you say yes, we would proactively contact you should any further suitable vacancies arise.

### *3.10.5 Conditional offer*

If we make a conditional offer of employment we will ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks to progress to a final offer. We are required to confirm the identity of our staff, their right to work in the United Kingdom and seek assurance as to their trustworthiness, integrity and reliability.

You will therefore be required to provide:

- ✚ Proof of your identity – you will be asked to attend our office with original documents, we will take copies.
- ✚ Proof of your qualifications – you will be asked to attend our office with original documents, we will take copies.

- ✦ You will be asked to complete a fitness and proprietary declaration including a criminal records declaration to declare any unspent convictions.
- ✦ We will contact your referees, using the details you provide in your application, directly to obtain references
- ✦ We will also ask you to complete a questionnaire about your health. This is to establish your fitness to work. This is performed through Blossoms Healthcare who provide our occupational health service.

If we make a final offer, we will also ask you for the following:

- ✦ Bank details – to process salary payments
- ✦ Emergency contact details – so we know who to contact in case you have an emergency at work
- ✦ Membership of a pension scheme – so we can help you determine whether you are eligible to re-join your previous scheme.

### *3.11 Other uses*

In addition to the above CDC may collect and process your information where we have obtained your consent or another legitimate and lawful purpose to do so, including:

- ✦ **Accounts:** including keeping accounts relating to any business and activity carried out by CDC and keeping records of purchases, sales and transactions;
- ✦ **Safety and security:** any method, system or process used by CDC to protect its physical and intellectual property, to protect its economic and financial interests and to protect the integrity of its directors, employees, investees and stakeholders.
- ✦ **IT support and development:** including processing as part of security event logging and monitoring of systems, business continuity planning and disaster recovery.
- ✦ **Compliance and legal claims:** including ensuring compliance with legal obligations or establishing, exercising or defending legal claims;
- ✦ **Scientific, historical and statistical research:** including the collection and processing of personal data for statistical surveys (or necessary to reach statistical results), analysing earlier events, and establishing patterns and rules of conduct;
- ✦ **Mergers and acquisitions:** To prepare for and carry out a merger, take-over, transfer of an undertaking, transfer of assets or any other type of corporate transaction; and
- ✦ **Any other purpose** described and communicated to you prior to using your personal data for such other purpose.

CDC will only process your personal data to achieve the purposes it was collected for, or for any other legitimate and lawful purpose.

CDC will notify the processing of personal data to the relevant authorities to the extent required under all applicable data protection laws and regulations.

## **4. Accurate Data**

It is important for us to maintain accurate and up to date records of your personal data. Please inform us of any changes to or errors in your personal data as soon as possible by contacting the DPO at [dataprotection@cdcgroupp.com](mailto:dataprotection@cdcgroupp.com). We will take reasonable steps to make sure that any inaccurate or out-of-date data is deleted, destroyed or amended accordingly.

## 5. Access and rectification

You have the right to access the personal data we hold about you and, if such personal data is inaccurate or incomplete, to request the rectification or erasure of such personal data. If you require further information in relation to your privacy rights or would like to exercise any of these rights, please contact the DPO at [dataprotection@cdcgroup.com](mailto:dataprotection@cdcgroup.com).

## 6. Timely processing

We shall retain your personal data in a manner consistent with the applicable data protection laws and regulations. We will only retain your personal data for as long as necessary to comply with the applicable laws and regulations or for the purposes for which we process your personal data. For guidance on how long certain personal data is likely to be kept before being destroyed, please contact the DPO at [dataprotection@cdcgroup.com](mailto:dataprotection@cdcgroup.com).

## 7. Data security

We shall ensure that appropriate technical and organisational security measures are taken against unlawful or unauthorised processing of personal data, and against the misuse, destruction, disclosure, acquisition, accidental loss of, or damage to personal data. Personal data shall only be processed by a third party processor if they can demonstrate adequate compliance or certification to relevant information security standards and practices.

Maintaining data security means protecting the confidentiality, integrity and availability of the personal data:

- ✚ Confidentiality: we will protect your personal data from unauthorised disclosure to third parties.
- ✚ Integrity: we will protect your personal data from being modified by unauthorised third parties.
- ✚ Availability: we will ensure that authorized parties are able to access your personal data when needed.

CDC has implemented an information security management system to protect the confidentiality, availability and integrity of our assets, including protection of information processing facilities and your personal data.

## 8. Data protection officer (DPO)

CDC has taken the decision to appoint a Data Protection Officer (DPO) to monitor internal compliance, inform and advise on our data protection obligations, provide advice regarding Data Protection Impact Assessments (DPIAs) and to act as a contact point for data subjects and the supervisory authority. The designated DPO for CDC and their contact information is as follows:

### **Director Business Integrity & Compliance**

**CDC Group**

**123 Victoria Street**

**Victoria**

**London**

**SW1E 6DE**

[dataprotection@cdcgroup.com](mailto:dataprotection@cdcgroup.com)

If you have a query in relation to this policy or our processing of your personal data, you can contact the DPO.

## 9. Disclosure of personal data

### 9.1 Categories of recipients

For the above-mentioned purposes, we may disclose your personal data to the following categories of recipients:

- ✦ Authorised staff members of the CDC Group plc
- ✦ Corporate affiliates and subsidiary companies of the CDC Group;
- ✦ Our communication agencies: to help us deliver and analyse the effectiveness of our communications;
- ✦ Business partners: trusted companies that may use your personal data to provide you with the services and/or the information you requested and/or that may provide you with communications (if you have consented to receiving them). We ask such companies to always act in compliance with applicable laws and this privacy policy and to pay high attention to the confidentiality of your personal data.

### 9.2 Service providers

Service providers are a core part of our IT strategy. CDC may share your personal data with external providers of IT related services (for example Microsoft, EACS, SAS, Spitfire, eFront, Mimecast):

A full list of service providers can be found in Appendix B.

### 9.3 Other parties when required by law or as necessary to protect CDC

CDC may share your personal data with other third parties:

- ✦ to comply with the law, regulatory requests, court orders, subpoena, or legal process;
- ✦ to verify or enforce compliance with CDC's policies and agreements; and
- ✦ to protect the rights, property or safety of CDC and/or its clients.

### 9.4 Other parties in connection with corporate transactions:

CDC may share your personal data with other third parties in the context of a divestiture of all or a portion of its business, or otherwise in connection with a merger, consolidation, change in control, reorganisation or liquidation of all or part of CDC's business.

### 9.5 Other parties with your consent or upon your instruction:

CDC may share your personal data with:

- ✦ third parties when you consent to or request such sharing; and
- ✦ Any other third party communicated to you by CDC prior to sharing your personal data with that third party.

Be aware that recipients as referred to above –especially service providers who may offer products and services to you through CDC applications or via their own channels– may separately collect data from you and, in these instances, are responsible for the control of your data. Your dealings with these service providers would fall under their own terms and conditions.

## 10. Use of social networks

CDC sometimes facilitates the publication of (personal) data via social media such as Twitter and Facebook. These social media have their own terms of use which you are required to consider and observe if you make use of them. Publication on social media may have (undesired) consequences, including for your privacy or

that of persons whose data you share, such as the impossibility of withdrawing publication in the short term. You must estimate these consequences yourself, for you are taking the decision about the publication on these media. CDC does not accept any responsibility in that regard.

## 11. Disclosures outside the EU

Your personal data may be transferred to any of the recipients identified in this policy, some of which may be outside the EU and may be processed by us and any of these recipients in any country worldwide. The countries to which your personal data is transferred may not offer an adequate level of protection. In connection with any transfer of personal data to countries that do not offer the same level of protection as in the EU, CDC shall implement appropriate measures to ensure an adequate level of protection of your personal data.

## 12. Your choices and your rights

We want to be as transparent as possible with you, so that you can make meaningful choices about how you want us to use your information.

We can contact you by post and by phone, and if you give us your prior consent to do so, by email, SMS and other electronics means.

### *12.1 Your choices*

In this context, you can make a variety of choices about how you want to be contacted by us, through which channel (e.g. email, mail, social media, etc.), for which purpose and how frequently, by contacting us at [dataprotection@cdcgroupp.com](mailto:dataprotection@cdcgroupp.com) or by following the unsubscribe instructions included in the communication.

Please note that by default, if you don't make a choice, you will receive our communications at the following frequency: at the date of publication.

### *12.2 Your personal information*

You may always contact us by post or email to find out what personal information we have concerning you, the origin of the data and to access or receive a copy of your data.

### *12.3 Your corrections*

If you find any mistake in your personal information or if you find it incomplete or incorrect, you can request that we correct it or complete it.

### *12.4 Your objections*

You may also object to the use of your data for direct marketing purposes (if you prefer, you can also advise us on which channel and how frequently you prefer to be contacted by us) or to the sharing of your personal information with third party for the same purpose.

### *12.5 Portability*

You may request a copy of your personal data from us in a structured, commonly used and machine-readable format. You can also request that we transfer your personal data to another controller. Portability applies when

we process your personal data in an automated means, either with your consent or for the performance of a contract.

#### *12.6 Erasure*

Finally, you may request for us to erase any data concerning you (except in some cases, for example, where we are required to retain the data by law).

### **13. Contact**

For any privacy issues, questions or complaints concerning the application of this policy or to exercise your rights within the context of this policy, you may contact CDC at [dataprotection@cdcgroupp.com](mailto:dataprotection@cdcgroupp.com). Alternatively, you may write to us:

Director Business Integrity and Compliance  
CDC Group plc  
123 Victoria Street  
London  
SW1E 6DE  
United Kingdom

## *Appendix A - CDC Group Companies*

### *UK Companies and entities:*

- ✦ CDC Group plc
- ✦ Ayana Holdings Ltd
- ✦ CDC Emerging Markets Limited
- ✦ CDC Holdings Guernsey Ltd
- ✦ CDC India Opportunities Limited
- ✦ CDC Limited
- ✦ CDC Overseas Holdings Ltd
- ✦ CDC Pakistan Power Projects Limited
- ✦ CDC Scots GP Limited
- ✦ CDC Scots LP
- ✦ Dayton Advisers Ltd (formerly called CDC Capital Partners Ltd)
- ✦ MedAccess (Private) Limited (formerly called CFAM Limited)
- ✦ Zambian Transmission LLP
- ✦ CDC Pensions Trust Limited
- ✦ CDC Asset Management Limited
- ✦ CDC Funds Management Limited
- ✦ CDC Capital for Development Limited

### *Non-UK Companies and entities:*

- ✦ CDC West Africa Investments Ltd
- ✦ Ayana Renewable Power Private Limited
- ✦ CDC East Africa Advisers Ltd
- ✦ Dayton Investments Limited
- ✦ CDC India Advisers Private Limited
- ✦ CDC Pakistan Power Limited
- ✦ Sinndar Holdings Limited
- ✦ CDC Africa Power Limited
- ✦ CDC Africa Cement Limited
- ✦ Africa Power XF Limited
- ✦ Globeleq Limited
- ✦ Africa Power Group Ltd
- ✦ CDC South Asia Ltd
- ✦ CDC Investment Holdings Ltd
- ✦ CDC Financial Services (Mauritius) Ltd
- ✦ North African Foods Ltd
- ✦ Pan African Foods Ltd
- ✦ Development Corporation Pakistan Advisers (Private) Limited
- ✦ Feronia Inc
- ✦ CDC PTL Holdings Ltd

## *Appendix B – CDC Service Providers*

- ✦ Access UK Ltd
- ✦ Automatic Data Processing Ltd
- ✦ Board Intelligence Ltd
- ✦ Bridewell Consulting LLP
- ✦ Capita Employee Benefits Ltd
- ✦ Celerity Systems (Pty) Ltd
- ✦ CIM Corporate Services Ltd
- ✦ CommunicateResearch Ltd
- ✦ Concur Holdings B.V.
- ✦ Dayton Advisers Ltd
- ✦ Deloitte LLP
- ✦ EACS Ltd
- ✦ eFront Ltd
- ✦ Egress Software Technologies Ltd
- ✦ Eventbrite UK Ltd
- ✦ Eximius Group Ltd
- ✦ Express Vending Ltd
- ✦ Factiva Limited
- ✦ Fruitful Office Ltd
- ✦ Google LLC
- ✦ HedgeOp Compliance LLC
- ✦ Hillgate Travel Ltd
- ✦ Holland Mountain Ltd
- ✦ International SOS Assistance UK Ltd
- ✦ IPES (Guernsey) Ltd
- ✦ ISCA Software International Ltd
- ✦ Joss Search & Selection Ltd
- ✦ Land Securities Properties Ltd
- ✦ Microsoft
- ✦ Mimecast Services Limited
- ✦ Morgan Spencer Ltd
- ✦ Nasdaq OMX Corporate Solutions International Ltd
- ✦ Posturite Ltd
- ✦ SAS Global Communications Ltd
- ✦ Scottish Widows Plc
- ✦ Sidekicks London Ltd
- ✦ SpitFire Digital Networks Ltd
- ✦ Survey Monkey
- ✦ Tenon FM UK Ltd
- ✦ The Hill Company Ltd
- ✦ The Rocket Science Group LLC
- ✦ Total Pest Control (UK) Ltd
- ✦ TxtLocal Ltd
- ✦ Typeform S.L.
- ✦ Xref (UK) Ltd



Investment works

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[cdcgroup.com](http://cdcgroup.com)

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 [@CDCgroup](https://twitter.com/CDCgroup)

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