

Supply Chain Management+ Privacy Notice

Information regarding how HS2 processes personal data can be found on our corporate Privacy Notice (<https://www.hs2.org.uk/privacy-policy/>).

This Notice aims to provide details regarding the specific circumstances in which we are processing (i.e. 'using') your personal data.

1. Why Are We Processing Your Personal Data?

Supply Chain Management + (SCM+) is an initiative which is providing HS2 with transparency of its supply chain under priority categories. It delivers mapping, data and insights into supply chain contractors, their capacity and capability, and specific market constraints that have the potential to impact the HS2 programme - direct from the suppliers at Tiers 2, 3, 4 and 5 etc.

As standard, HS2 Supply Chain Management (SCM) has visibility of Tier 1 and critical Tier 2 contracts only across the HS2 programme. Gaining greater transparency and mapping the capability of the deeper supply chain enables HS2 to:

- evidence, respond to and mitigate risks that could impact cost and programme (e.g. advanced warning of supplier insolvency);
- develop a deeper understanding of risk from the suppliers delivering works;
- provide a route to engage, embed and obtain support from our suppliers to achieve HS2's strategic goals collectively;
- support and develop lower tier suppliers who are unaware of the guidance HS2 can provide (i.e. Jobs Brokerage, Sustainability School, CompeteFor etc.);
- gain information that can feed into continuous improvement and lessons learned, particularly for Phase 2, improving value for the UK taxpayer.

Supplier employee contact details are requested by the SCM team in order to engage with the next tier of suppliers for the next level of transparency. It is not possible to gain awareness of lower tier suppliers and contracts without this communication approach, as there is no contractual requirement of HS2's suppliers to track and share this information beyond critical Tier 2s.

Furthermore, contact details enable on-going 2-way communication between HS2 and

its supply chain in support of delivering HS2's Strategic Goals and rebalancing the economy, through raising awareness of the development provisions and opportunities available to all supply chain organisations.

No personal data is stored or shared outside of the limited access excel datasets created as part of this initiative, nor utilised other than in line with the initiative purpose of expanding visibility and providing a route to engage with HS2's supply chain, except where expressly consented to (e.g. for HS2 supply chain case studies). Not all contact details provided under the initiative are utilised to gain further visibility as not all suppliers at the lower tiers are directly engaged during the meeting phase of the project. All contact details provided may be utilised for on-going communication purposes.

2. What Personal Data Is Being Processed?

Personal data is collected under this project in the form of supplier contact details, where an employee name, title, email address and/or phone number has been provided (as opposed to generic company contact details). All information provided to HS2 is shared voluntarily by the companies spoken to. We take every reasonable step to make sure that we keep your personal information safe, in line with best practice, ICO guidance, the UK General Data Protection Regulations (GDPR) and any other relevant laws.

3. What Is The Lawful Basis For Processing Your Data?

Under UK GDPR Article 6(1)(e), the processing is necessary for the performance of a task carried out in the public interest. HS2 Ltd is tasked to ensure that benefits of the project are realised in a manner that makes the best use of public monies. This processing looks to meet that task by enabling improved risk management, as well as support of and integration with our Tier 2, 3, 4, and 5 etc. supply chain partners, thereby increasing capacity and capability, and driving innovation.

4. Is There a Requirement to Supply HS2 the Personal Data?

No.

5. Will the Personal Data Processing Be Subject to Any Form of Automated Decision Making?

No.

6. Who Do We Disclose Your Personal Data To?

Your data will not be disclosed outside of HS2, except where we are required to by law or court order as defined by UK GDPR.

7. Where Do We Process Your Personal Data?

All personal data is processed and stored within the UK. Where it is necessary to process data outside of the UK, we will be clear with you about why we need to do this and what steps we have taken to make sure we have the right safeguards in place to certify that your information is protected in line with the UK GDPR. This Privacy Notice will be updated to reflect that.

8. How Long Will We Be Holding Your Personal Data For?

Your information will be held for a period 15 years, after which it will be anonymised (all personally identifiable information is removed) or securely erased.

9. Your Rights:

You are afforded a number of rights regarding the way in which HS2 process data about you, which are as follows:

- the right to access a copy of your personal data held by, or on behalf, of HS2.
- the right to request HS2 to rectify, erase, or restrict the personal data we hold about you,
- the right to object to HS2 processing your personal data,
- the right at any time to withdraw your consent allowing HS2 to process your data.
- the right to lodge a complaint with the Information Commissioner's Office.

If you would like to exercise any of the above rights you are invited to contact the HS2 Data Protection Officer, contact details for which are provided in Section 8 below.

If, however, you would like to lodge a complaint with the Information Commissioner's Office.

10. HS2 Data Protection Officer Details:

If you have any questions or queries regarding the way in which HS2 are processing personal data about you or the person(s) that you represent, you are invited to contact the HS2 Data Protection Officer on the details provided below:

Email: HS2DataProtection@hs2.org.uk

Mail:

Data Protection Officer,
High Speed Two Ltd
Two Snow Hill
Queensway
Birmingham
B4 6GA

Freephone: 08081 434 434

Minicom: 08081 456 472

Alternatively, you can lodge a complaint with the Information Commissioner's Office:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Email: <https://ico.org.uk/global/contact-us/email/>
Helpline: 0303 123 1113