

CHALLENGER

SITE SERVICES

Corporate Handbook

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

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Policy Statement

For the purposes of this Handbook:

- “**Challenger**” refers to Challenger Site Services;
- “**Director**” means a director of Challenger as registered with Companies House;
- “**Driver(s)**” refers to a person(s) employed by Challenger as a driver/cleaner; and
- “**Management Team**” means the Challenger management team as identified in the Challenger structure chart.

Anti-Corruption Policy

Challenger is committed to the practice of responsible corporate behaviour and to instilling a strong anti-corruption culture. Challenger 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 Challenger or anyone working on behalf or in connection with Challenger.

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.

It is the responsibility of all 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’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's interests. Employees must act in the best interests of Challenger 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, failure to comply with this Policy and/or with the Act may result in disciplinary action (which may include dismissal) and/or criminal penalties under the Act (which may include in a fine and/or imprisonment for up to 10 years).

Any breach of this Policy by any employee or business associate may result in Challenger being in breach of the Act and therefore subject to fines, and/or 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'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; or
- 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; and
- report any and all concerns relating to bribery or collusion to a member of the Management Team, or their normal point of contact at Challenger, or in accordance with Challenger's Whistleblowing Policy.

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.

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.
- The giving or receiving of gifts or hospitality must not create the impression that the award of any business, custom, contract or similar will be in any way conditional upon them.
- Cash should be neither given nor received as a gift without explicit approval from a Director. Any attempt to give cash to a Challenger employee must be immediately reported to a Director.
- Gifts and hospitality should generally be avoided at the time of contracts being tendered or awarded.
- The value of all gifts and hospitality should be reasonable and proportionate when compared to prevailing practices, and not lavish or excessive.
- 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 will donate any gifts accepted for such reasons to a charity of its choosing.

Challenger recognises that proportionate hospitality can play an appropriate role in maintaining and developing long-standing commercial relationships. Accordingly, reasonable corporate hospitality may be offered to existing customers where:

- the purposes is to strengthen or maintain a legitimate business relationship;
- it is not connected to, or conditional upon, the award of new business, the continuation of existing business or a specific tender or award; and
- it is proportionate and in line with Challenger's normal hospitality practices.

Challenger employees must report all gifts and hospitality offered or received to a Director. All gifts and hospitality offered or received by Challenger is recorded in a register including details of the donor/recipient, a description of the offer, the value (approximated if not known) and the date.

Political donations

Challenger 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 and are not made to obtain any form of advantage in any business transaction.

Monitoring

Challenger is alert to any possible bribery or corruption issues. Employees can report any concerns to a member of the Management Team or by following the Whistleblowing Policy in the HR Handbook. Concerns will be investigated accordingly and action will be taken (if necessary) as a result of that investigation, including policy changes, if necessary.

Challenger has remained loyal to a core group of suppliers since its inception and has full confidence in the way those suppliers are run. However, in order to ensure as far as possible that its supply chain is free of bribery or corruption, Challenger adopts a risk-based approach to each supplier.

Each supplier with a spend in excess of a certain threshold is assessed according to a number of factors such as the type of product being supplied, the domicile of the supplier, the value of the spend, and any political or macro-economic factors. If Challenger has cause to suspect that a supplier or its supply chain may be susceptible to bribery or corruption, then it will in the first instance write to the supplier and seek confirmation that anti-bribery and corruption policies are in place. In the absence of a satisfactory response or in the face of evidence that contradicts any response provided, Challenger may take measures to obtain the product being sought from an alternative supplier.

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 operations

Challenger strictly prohibits the use of modern slavery and human trafficking in its operations. Challenger has been 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 is achieved by ensuring that all employees:

- are paid at least the national living wage;
- have a contract of employment including written Terms and Conditions of Employment and have not had to pay any fees to obtain work;
- are legally able to work in the UK and are in possession of legal documents to confirm this such as passport and/or birth certificate and National Insurance number;
- are aware of their statutory rights, including minimum wage, sick pay and holiday pay; and
- provide addresses to ensure there are no suspicions of exploitation (for example, a large number of employees listing the same address may indicate high shared occupancy, often a factor for those being exploited).

The prevention, detection, and reporting of modern slavery in any part of the company is the responsibility of all employees, and no employee may engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this Policy.

Ethical sourcing

Challenger is committed to ensuring that its supply chain does not utilise or encourage slavery or human trafficking, and that its suppliers adhere to the Ethical Trading Initiative Base Code (the "**Code**"), which requires that:

- employment is freely chosen;
- freedom of association and the right to collective bargaining are respected;
- working conditions are safe and hygienic;

- child labour shall not be used;
- living wages are paid;
- working hours are not excessive;
- no discrimination is practiced;
- regular employment is provided; and
- no harsh or inhumane treatment is allowed.

Challenger has remained loyal to a core group of suppliers since its inception and has full confidence in the way those suppliers are run. However, in order to ensure as far as possible that its supply chain is free of modern slavery or human trafficking, Challenger adopts a risk-based approach to each supplier.

Each supplier with a spend in excess of a certain threshold is assessed according to a number of factors such as the type of product being supplied, the domicile of the supplier, any macro-economic factors, and the price of the product compared to market rates. If Challenger has cause to suspect that a supplier's supply chain may not be fully compliant with the Code, then it will in the first instance write to the supplier and seek confirmation that the Code is being adhered to. In the absence of a satisfactory response or in the face of evidence that contradicts any response provided, Challenger may take measures to obtain the product being sought from an alternative supplier.

Corporate Social Responsibility Policy

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

Robert Allen, Director at Challenger, says: *“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”.*

The Directors 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 Challenger operates, the following values shape the decision-making process.

Long-term decision making

- Decisions are made with consideration of the future; Challenger is committed to work to improve our performance in the long-term as well as in the short-term.
- 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

- Challenger is guided by its aim to be the employer of choice in all communities in which it operates.
- Challenger strives to be diverse and inclusive with strong levels of employee engagement.
- Challenger encourages employee feedback and involvement in business practices and is committed to training and upskilling its workforce.

Suppliers and customers

- Challenger depends upon its customers.
- Every employee is responsible for ensuring that any contact with customers and the public at large reflects Challenger'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 are regarded as partners to help Challenger achieve its aspirations in the delivery of its products and services. All Challenger suppliers are carefully selected to ensure they share Challenger values.

Community and environment

- Challenger is committed to being a responsible corporate body through support for appropriate non-political and non-sectarian projects, organisations and charities.
- Challenger is committed to a programme of management, continuous improvement and reporting of Challenger's direct and indirect impacts, which marks its contribution to improving the world in which it exists.
- Challenger 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.

Reputation

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

Fairness and equality

- Challenger 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's structure means that employees share the responsibilities of ownership as well as its rewards.

- Challenger 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, but across the industry.

Complaints Policy

Whilst Challenger 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 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, Challenger 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. A full investigation is conducted by a member of the Management Team, considering 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 to prevent reoccurrence.

All formal complaints are recorded and investigated within 10 working days to identify whether control measures have failed and whether operational improvements can be made.

This Policy is also followed where Challenger identifies significant breaches of its operating procedures, regardless of whether the breach resulted in a customer complaint.

Environmental and Sustainability Policy

Challenger recognises that its activities may have some impact on the environment but will endeavour to minimise any impact where possible. Challenger believes good environmental performance helps ensure good business performance, and is committed to meeting industry best practice in environmental performance wherever possible.

In pursuit of Challenger's goals, Challenger will:

- Endeavour, as a minimum requirement, to always conduct Challenger activities within the law and the requirements of statutory regulations.
- Develop and promote policies and procedures that minimise, where practical, the detrimental impact that Challenger's activities may have upon the environment.
- Encourage the development of suitable methods, which promote environmental protection and/or minimise their environmental effects.
- Encourage contractors and suppliers to pursue best practice and to apply environmentally-friendly solutions.
- Provide education and training for employees, to help them include environmental considerations in all the aspects of their work friendly solutions.
- Attempt to make efficient use of natural resources and minimise, where possible, the use of utilities and production waste.
- Dispose of waste in accordance with waste management requirements; including where practical, respecting the environmental demands of the communities in which Challenger operate and society in general.

Challenger assesses its impact on the environment and implements appropriate measures to reduce those impacts. Those measures are monitored regularly and audited on an annual basis.

Environmental issues, environmental legislation and environmental priorities will change with time. Challenger will monitor environmental developments, regularly review and where necessary amend, or make additions to this Policy.

Equal Opportunities, Bullying and Harassment Policy

Challenger aims to be an equal opportunities employer and will not tolerate discrimination, bullying or harassment of any kind in any aspect of employment. All dealings with colleagues, customers and suppliers must be conducted in a proper and appropriate manner.

Challenger fully supports the rights and opportunities of all people to seek, obtain and hold employment without sexual harassment. Challenger endeavours to provide a working environment free of sexual harassment and all managers are expected to take appropriate action to ensure compliance with this policy.

Definitions

Equal opportunities means that no person should face discrimination on the basis of their age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation.

Bullying can be characterised as behaviour which is offensive, intimidating, malicious or insulting or an abuse of power which is intended to undermine, humiliate or denigrate the target of that behaviour.

Harassment does not depend upon the motivation of the harasser. Harassment means any unwanted conduct which affects the dignity of persons in the workplace. This often means harassment on grounds of sex and race, but it also extends to other types of behaviour, such as harassment based on a person's age, disability, sexual orientation, religion, political views, social class or membership (or non-membership) of a trade union.

Discrimination, bullying or harassment may be face-to-face or more remotely such as via email, memos or the telephone. It may be a single incident or a series of events over time. The conduct can include physical, verbal or non-verbal behaviour.

Sexual harassment is unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated. It includes situations where a person is asked to engage in sexual activity as a condition of that person's employment, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient.

Sexual harassment can involve one or more incidents and actions constituting harassment may be physical, verbal and non-verbal. Examples of conduct or behaviour which constitute sexual harassment include, but are not limited to:

- physical conduct;
- unwelcome physical contact including patting, pinching, stroking, kissing, hugging;
- fondling, or inappropriate touching;
- physical violence, including sexual assault;
- physical contact, e.g. touching, pinching;
- the use of job-related threats or rewards to solicit sexual favours;
- verbal conduct;
- comments on a worker's appearance, age, private life, etc.;
- sexual comments, stories and jokes;
- sexual advances;
- repeated and unwanted social invitations for dates or physical intimacy;
- insults based on the sex of the worker;
- condescending or paternalistic remarks;
- sending sexually explicit messages (by phone or by email);
- non-verbal conduct;
- display of sexually explicit or suggestive material;
- sexually-suggestive gestures;
- whistling; and
- leering.

This list is not exhaustive, and that sexual harassment can include any conduct of a sexual nature which is unwanted and unwelcome by the recipient.

Anyone can be a victim of sexual harassment, regardless of their sex and of the sex of the harasser. Challenger recognises that sexual harassment may also occur between people of the same sex. What matters is that the sexual conduct is unwanted and unwelcome by the person against whom the conduct is directed.

Challenger recognises that sexual harassment is a manifestation of power relationships and often occurs within unequal relationships in the workplace, for example between manager or supervisor and employee.

Responsibilities

Challenger endeavours to ensure that individuals are treated equally, including in vacancy advertising, selection, recruitment, training, conditions of service, and termination of employment.

Challenger has a duty to:

- promote a culture that welcomes diversity and fosters an ethos of equal opportunities throughout the business;
- treat complaints of discrimination, bullying or harassment seriously;
- ensure complainants are not victimised as a result of making a complaint; and
- ensure that cases are dealt with in accordance with the Grievance Policy, Whistleblowing Policy and Disciplinary Policy.

Employees have a duty to:

- accept responsibility for their own behaviour;
- not indirectly support discrimination, bullying or harassment by ignoring it but instead confront the individual informally to stop the behaviour; and
- report incidents and offer support to a known victim.

Challenger operates a zero-tolerance policy for any form of sexual harassment in the workplace and treats all incidents seriously. It will promptly investigate all allegations of sexual harassment and any person found to have sexually harassed another will face disciplinary action, up to and including dismissal from employment. All sexual harassment is prohibited whether it takes place within Challenger premises or outside, including at customer's sites, social events, business trips, or training sessions.

Complaints and liability

All complaints should be made, and will be dealt with, in accordance with the Grievance Policy or the Whistleblowing Policy in the HR Handbook.

Disciplinary action will be taken if an employee is victimised for making a complaint. If an employee abuses this policy and makes a complaint which is not bona fide, disciplinary action may be taken against them.

Employees who breach this Policy may be held personally liable if the person who has been harassed takes legal action. In cases of very serious harassment, the employee responsible for the harassment may be prosecuted in the criminal courts.

Insurance Policy

Challenger 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 and vehicle fleet insurance.

Insurance is managed by Challenger's external insurance broker, which deals with renewals, claims and investigations. Regular informal meetings and annual renewal meetings are held between the broker and Directors.

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.

See the Fleet Insurance Policy in the Drivers Handbook for further detail on fleet insurance requirements.

Privacy Policy

Challenger is committed to protecting the privacy of all personal information collected in the course of business. Challenger complies with all data protection laws applicable to the United Kingdom including the Data Protection Act 2018.

This privacy policy applies to personal information about:

- visitors to the Challenger website – <https://www.challengernw.co.uk>;
- customers who purchase goods or services from Challenger;
- suppliers who supply goods or services to Challenger; and
- members of the public who have contacted Challenger.

For details on how Challenger may process the personal information of employees, job applicants, interns and volunteers, please see the HR Data Protection Policy in the HR Handbook, which is supplemental to this Policy.

This 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.

Definitions

Personal information is any information that could be directly or indirectly used 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.

'**Processing**' 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 and processor

Challenger 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.

Challenger may 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 (the data controller) may ask another company (the data processor) to store employee personal information in its cloud services. As a result, the data controller will provide the data processor with the personal information required to carry out this request without being able to control the personal information directly.

Processing of personal information

As a general rule, special category data about the persons covered by this Policy (as outlined above) is not collected. The exception is where suspected criminal activity is identified, such as, the use of stolen payment card details. In this case, all details of the suspected criminal activity (including any special category data) 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.

Personal information may be processed by Challenger in the following circumstances.

Contractors and consultants

Contractors and consultants working for Challenger may have their personal information stored and used:

- to assess their suitability during a tendering process;
- to comply with relevant laws and regulations;
- to arrange payment for goods and/or services;
- to communicate with the contractor or consultant;
- for record keeping purpose; and/or
- for claims management and insurance purposes.

Customers and prospective customers

Personal information about customers and prospective customers may be provided over the telephone, in person at our depot, via email, via our website or via our social media accounts.

If products or services are purchased or enquiries are made, personal information of customers or prospective customers may be stored and used to:

- respond to enquiries;
- keep customers informed about Challenger's products and services;

- process orders;
- follow up on orders that are not completed;
- process initial and ongoing payments for orders;
- manage deliveries and collections;
- manage a customer's account or credit account (if applicable) including carrying out trade references;
- deal with complaints;
- assist with claims management and insurance obligations;
- produce testimonials; and/or
- conduct market research.

In addition, Challenger 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 Challenger at the address at the end of this Policy.

Website cookies

The Challenger 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:

- help Challenger 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 information or adverts shown on the website to the individual browsing; and
- provide insights into which areas of the website are useful and which areas need improvement.

The Challenger website uses the following types of cookies:

- essential cookies – these are used to make sure the information is displayed correctly on the website, and they record whether or not additional cookies have been accepted;

- analytics cookies – Google Analytics is used to better understand: how visitors use the website; how users arrived at the website; how long users remained on the website; and whether users return to the website. They also help to control website traffic at busy times. These cookies use anonymous information only and are deleted after 26 months.
- functionality cookies – these are 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 user's 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, install the Google Analytics opt-out add-on for your browser.

Suppliers

If products or services are supplied to Challenger, personal information of suppliers may be stored and used:

- for order processing and management;
- to manage deliveries/collections, installations, returns and refunds;
- to manage a Supplier's account, including conducting trade reference checks 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/or
- for record keeping purposes.

Members of the public (non-customers)

If contact is made with members of the public, personal information may be stored and used to deal with enquiries and complaints and for claims management and insurance purposes.

CCTV

A CCTV system is used within the offices, workshop and yard area. The CCTV system

may be used to:

- ensure the safety and security of staff, buildings, assets and information located or stored on the premises;
- investigate security incidents, should such incidents occur;
- investigate breaches of policies and procedures or staff conduct or behaviour;
- 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;
- ensure compliance with Challenger policies and procedures;
- capture images for training purposes; and
- 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.

The CCTV system will not be used for any other purpose without prior consultation with the Directors.

Challenger 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. It is therefore 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 of neighbouring spaces, 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 spaces 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:

- Challenger's name, as the entity responsible for the surveillance;
- the purpose of the surveillance;
- contact details of who to speak to regarding the CCTV; and
- an image of a camera.

CCTV recordings are only to be reviewed by Challenger Directors or members of the Management Team with authority from a Challenger Director. 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. All media will be disposed of securely when no longer required.

Vehicle dashcams

Challenger's fleet of vehicles utilise outward and inward facing dashcams. The impact of this system on Challenger employees is covered in the HR Data Protection Policy which is supplemental to this Policy. However, the outward facing cameras will inevitably capture members of the public on public highways and on customer's sites. This footage may be used for a number of reasons including during accident investigations, complaint investigations, training and driving safety improvements.

Footage may only be viewed in two circumstances: the camera's internal AI system has identified a safety infringement, policy violation, accident or harsh braking incident; or (b) upon manual request. Manual requests may only be made by member's Challenger's Management Team and will only be made if Challenger has a legitimate interest in viewing that footage.

If footage is not requested, it will be overwritten. If it is requested, it will be retained in accordance with the data retention policies of the dashcam provider.

Lawful basis for processing personal information

The specific grounds used for processing personal information depends on the nature of the processing. However, it is likely that the most applicable lawful basis for processing personal information in the circumstances outlined above would be that doing so is necessary to fulfil a contract between Challenger and a customer or supplier, or take steps at the request of the customer/supplier prior to entering into a contract. For example, Challenger may need to telephone an individual in response to a customer enquiry.

In other circumstances, the following lawful bases may apply:

- legitimate interest – processing personal information may be necessary for Challenger's legitimate interest in something;
- consent – Challenger may at times ask for an individual's consent to process their personal information; and/or
- legal obligation – in limited circumstances, Challenger may have a legal obligation to process personal information.

Security of personal information

Challenger is committed to safeguarding personal information that is provided in the course of business.

General security requirements

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 Director;
- report any suspicious behaviour and/or breaches of this policy to a Director 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; and
- special care should be exercised when using information contained on portable computers.

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. For example:

- visitors must always be escorted by a trusted employee when in areas that hold confidential data and information.
- personnel using the devices should report suspicious behaviour and indications of tampering of the devices to a Director without delay.

Network security

The following network security arrangements are in place at Challenger:

- 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 Director;
- all data must be securely disposed of when no longer required by Challenger, regardless of the media or application type on which it is stored;
- Challenger will arrange for the destruction of hardcopy materials; and
- all documents and files that are backed-up are encrypted.

Cardholder security

Challenger utilises a PCI-compliant payment platform which allows payments to be processed without card details being visible by Challenger or any of its employees. This is the safest and most secure method that Challenger has identified to be able to process card payments for customers without taking card details over the telephone.

It is strictly prohibited to store the contents of the payment card magnetic stripe (track data), the CVV/CVC or the PIN or encrypted PIN block on any media whatsoever or in any circumstances.

Website security

Appropriate measures are used to protect the information that is submitted through Challenger's 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 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. Use of these links will result in leaving the Challenger website and Challenger is not responsible for the contents of any third-party website.

Disclosure

Like most organisations, Challenger engages service providers to run the IT, payroll and pension processing systems. 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.

Personal information may also be disclosed to tax, customers and excise authorities; regulators, courts and the Police; central and local government; screening agencies; insurance companies and other professional advisors.

Some of the companies who provide services to Challenger 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 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 an International Data Transfer Agreement for the transfer of personal information to third countries.

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

Data breach procedure

If Challenger IT systems are breached then a Director should arrange for the compromised system to be isolated from the network in the first instance. Law enforcement agencies and the ICO should be notified as required, depending on the nature of the breach. Notifications may also need to be made to other agencies such as merchant providers, internet service providers, insurance providers and card services providers.

A Director should then investigate the incident by gathering a reviewing logs and related information and conducting appropriate forensic analysis of the compromised system. A third-party agency may be used to assist with the investigation. Findings should be made available to law enforcement agencies as required.

The Director should 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 will retain personal information for no longer time than is necessary for the legitimate business purposes described above. Information from website visitor

enquiries will be 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.

Record description	Minimum retention period
CCTV	1 month
Vehicle tracking	1 month
Tachograph records	2 years
Accident book records	3 years
Waste transfer notes	3 years
Customer and supplier records	7 years
Invoice and accounting records	7 years

Changes to this policy

Challenger reserves the right to amend this policy from time to time without 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;
- 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'); and
- 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 a Director in writing

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/> or 0303 123 1113.

Version Control

Version 2026.0 represents the annual review issue. Amendments made before the next annual review will be recorded below.

Version number	Date	Reviewed by	Approved by