



TRAFFIC IQ LIMITED

PRIVACY POLICY & PRIVACY NOTICE

Version: V1

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Table of Contents

Table of Contents	2
1. Purpose	3
2. Scope.....	3
3. Legal and regulatory framework.....	3
4. Data protection principles	3
5. Personal data Traffic IQ may process.....	4
6. Sources of personal data.....	4
7. Purposes and lawful bases for processing	5
8. Special category and criminal offence data	6
9. Recruitment, agency and right-to-work information.....	6
10. Sharing personal data.....	6
11. International transfers.....	6
12. Retention and secure disposal.....	7
13. Information security	7
14. Individual data protection rights	7
15. How to exercise rights.....	8
16. Personal data breaches.....	8
17. Monitoring, CCTV and technology.....	8
18. Automated decision-making and profiling	8
19. Training and responsibilities.....	8
20. Complaints and ICO.....	9
21. Policy governance and review	9
22. Related documents and records.....	9

1. Purpose

Traffic IQ Limited ("Traffic IQ", "we", "us" or "our") is committed to protecting personal data and respecting the privacy of individuals whose information we collect, receive, use or otherwise process. This policy explains the principles and arrangements Traffic IQ applies when processing personal data in connection with its business, including temporary traffic-management workforce solutions, recruitment, assignments and related operational activities.

This document operates both as an internal data protection policy and, where appropriate, as privacy information for individuals. Where a more specific, just-in-time privacy notice is required (for example for a particular medical assessment, drug/alcohol test, monitoring activity or recruitment process), Traffic IQ will provide that information separately.

2. Scope

This policy applies to personal data processed by or on behalf of Traffic IQ relating to:

- employees and workers;
- agency workers, temporary workers and operatives;
- job applicants, candidates and prospective workers;
- contractors, consultants and professional advisers;
- clients, hirers, suppliers and their personnel;
- emergency contacts and referees;
- visitors and other individuals who interact with Traffic IQ; and
- other individuals whose personal data Traffic IQ processes in the course of its activities.

3. Legal and regulatory framework

Traffic IQ will process personal data in accordance with applicable UK data protection law, including:

- UK General Data Protection Regulation (UK GDPR);
- Data Protection Act 2018 (DPA 2018);
- Data (Use and Access) Act 2025 (DUAA), which amends the UK GDPR, the DPA 2018 and PECR and is now in force in phases;
- Privacy and Electronic Communications Regulations 2003 (PECR), where applicable;
- applicable employment, immigration, health and safety and other legislation where personal data is processed to comply with legal obligations; and
- relevant guidance issued by the Information Commissioner's Office (ICO) and other competent authorities.

Traffic IQ will review this document when relevant legislation or regulatory guidance changes and before introducing materially new processing activities.

4. Data protection principles

Traffic IQ will apply the following principles to personal data:

- Lawfulness, fairness and transparency — data will be processed lawfully, fairly and in a way individuals can understand.
- Purpose limitation — data will be collected for specified, explicit and legitimate purposes and not used incompatibly with those purposes.

- Data minimisation — only data that is adequate, relevant and necessary for the relevant purpose will be collected or used.
- Accuracy — reasonable steps will be taken to keep personal data accurate and up to date and to correct inaccurate information.
- Storage limitation — personal data will not be retained for longer than necessary, subject to legal, regulatory, contractual and evidential requirements.
- Security — appropriate technical and organisational measures will protect personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage.
- Accountability — Traffic IQ will maintain appropriate records and controls to demonstrate compliance.

5. Personal data Traffic IQ may process

Depending on the relationship and purpose, Traffic IQ may process:

- identity and contact information, such as name, address, telephone number and email address;
- recruitment and employment information, such as CVs, qualifications, experience, references, training and assignment history;
- right-to-work and immigration information, including evidence required to establish a right to work in the UK;
- payroll, tax, pension, holiday, attendance, timekeeping and absence information;
- health, disability, occupational health, fitness-to-work and safety-related information where necessary and lawfully processed;
- diversity and equality-monitoring information where collected for lawful purposes;
- disciplinary, grievance, incident and investigation records;
- information relating to drug and alcohol testing where such testing is lawfully undertaken;
- client, hirer, supplier and business-contact information;
- IT, communications, device and security information; and
- other information reasonably necessary for Traffic IQ's lawful business and workforce-management activities.

Traffic IQ will not collect information merely because it might be useful in the future. In particular, health information and other sensitive information will be limited to what is necessary and proportionate for the stated purpose.

Traffic IQ does not appoint its own occupational health provider. Where a client requires an operative to hold an occupational health certificate, Traffic IQ may collect and hold a copy of that certificate as part of the assignment process.

6. Sources of personal data

Personal data may be obtained directly from the individual or from other lawful sources, including:

- the individual, through applications, onboarding forms, correspondence and other communications;
- clients or hirers in connection with assignments;

- referees and previous employers, where appropriate;
- professional, training or qualification bodies;
- government departments and public authorities, including where required for right-to-work verification;
- service providers such as payroll, HR, occupational health or testing providers; and
- publicly available sources where use is lawful and proportionate.

Where personal data is obtained from another source, Traffic IQ will provide the privacy information required by applicable law, subject to any lawful exception.

7. Purposes and lawful bases for processing

Traffic IQ will identify and document an appropriate lawful basis before processing personal data. The applicable basis depends on the specific processing activity; no single lawful basis applies to all processing.

Purpose	Typical data	Potential UK GDPR lawful basis	Notes
Recruitment and selection	Identity, contact, CV, qualifications, references	Contract; legitimate interests; legal obligation where applicable	Exact basis confirmed for each process.
Assignment and workforce administration	Contact, assignment, attendance, hours, pay-related data	Contract; legal obligation; legitimate interests	Includes administration of agency/temporary work.
Right-to-work checks	Identity and immigration evidence	Legal obligation	Checks follow current Home Office requirements.
Health, safety and fitness for work	Relevant health/fitness information	Legal obligation; employment/social protection law; other applicable basis	Special category condition also identified where required.
Equality monitoring	Relevant diversity information	Legal obligation; substantial public interest; explicit consent depending on purpose	Used only where necessary and with appropriate safeguards.
Drug/alcohol testing	Test results and related fitness information	Art. 6: legitimate interests/legal obligation. Art. 9: employment, social security and social protection law (DPA 2018 Sch. 1, Part 1)	Traffic IQ does not currently carry out drug and alcohol testing directly. Where a hirer's own testing programme applies to an assignment, any test results or related data shared with Traffic IQ will be processed in accordance with this policy.
Legal claims, investigations and compliance	Relevant personnel, incident and correspondence records	Legitimate interests; legal obligation; establishment/exercise/defence of legal claims	Access restricted to those who need it.

Where Traffic IQ relies on legitimate interests, it will identify the legitimate interest and consider whether the processing is necessary and whether the individual's interests, rights and freedoms override that interest.

8. Special category and criminal offence data

Some information Traffic IQ may process is subject to additional safeguards. This includes, where applicable, health information, disability information and certain equality-monitoring information, as well as criminal offence data. Traffic IQ will only process such information where the requirements of applicable data protection law are satisfied, including identifying the relevant additional condition where required.

Where a Schedule 1 condition of the DPA 2018 requires an appropriate policy document, Traffic IQ will maintain the necessary documentation and safeguards. Access to sensitive information will be limited on a need-to-know basis.

9. Recruitment, agency and right-to-work information

Because Traffic IQ undertakes temporary employment agency activities, recruitment and workforce administration may involve processing information about candidates, agency workers and operatives. Information will be used only for stated recruitment, onboarding, assignment, compliance and workforce-management purposes.

Right-to-work evidence will be processed for the purpose of complying with immigration law and associated employer obligations. Traffic IQ will apply its right-to-work procedure consistently and will not use immigration checks as a pretext for unlawful discrimination.

10. Sharing personal data

Traffic IQ may disclose personal data where necessary and lawful to:

- clients, hirers and end users of temporary/agency workers, where necessary for assignment, safety, administration or contractual purposes;
- payroll, pension, HR, IT, recruitment, occupational health, testing and other service providers acting on Traffic IQ's behalf;
- professional advisers, insurers and auditors;
- government departments, regulators, law-enforcement bodies and courts where required or permitted by law;
- emergency services or other persons where necessary to protect an individual's vital interests or in another lawful emergency situation; and
- other recipients where the individual has been informed and a lawful basis exists.

Where a third party processes personal data on Traffic IQ's behalf, Traffic IQ will take appropriate steps to ensure that the processing is governed by appropriate contractual and security arrangements.

11. International transfers

Traffic IQ will not transfer personal data outside the UK unless the transfer is lawful under applicable data protection law. Where required, Traffic IQ will rely on an applicable adequacy regulation or implement appropriate safeguards and any required supplementary measures.

Traffic IQ will maintain records of any international transfers, including the countries, recipients and applicable transfer mechanism.

Traffic IQ uses third-party tools including Gmail for business communications and worker administration, which may involve the transfer of personal data outside the UK, including to the United States. These providers rely on Standard Contractual Clauses or equivalent safeguards recognised under UK data protection law to ensure such transfers are lawful.

12. Retention and secure disposal

Traffic IQ will maintain a documented retention schedule. Retention periods will be based on the purpose for which information is held and any applicable legal, regulatory, contractual, insurance, audit or limitation-period requirements. The company will:

- avoid retaining information indefinitely without justification;
- review retention periods periodically;
- delete, securely destroy or anonymise information when it is no longer required, subject to lawful preservation requirements;
- apply enhanced controls to sensitive information; and
- document exceptions where information must be retained for a legal claim, investigation or other lawful reason.

Specific retention periods will be documented in Traffic IQ's Records Retention Schedule.

13. Information security

Traffic IQ will use appropriate technical and organisational measures, proportionate to the risk, including where appropriate:

- role-based access and least-privilege controls;
- password and authentication controls;
- secure storage and transmission;
- device and system security measures;
- backup and recovery arrangements;
- physical security for paper records and premises;
- staff confidentiality and data protection training;
- supplier and processor due diligence;
- secure disposal of paper and electronic records; and
- periodic review of security arrangements.

Health and other sensitive information will receive enhanced access controls where appropriate. Managers will generally receive only the information necessary to carry out their responsibilities.

14. Individual data protection rights

Subject to applicable legal conditions and exemptions, individuals may have rights including:

- the right to be informed about processing;
- the right of access;
- the right to rectification;
- the right to erasure in applicable circumstances;
- the right to restrict processing in applicable circumstances;
- the right to object to certain processing, including where the legal conditions for objection apply;
- the right to data portability where applicable;
- rights concerning automated decision-making and profiling where applicable; and

- the right to withdraw consent where consent is the lawful basis.

Rights do not apply in exactly the same way to every processing activity. Traffic IQ will assess each request under the applicable legal requirements.

15. How to exercise rights

Individuals may submit a data protection request to Traffic IQ using the contact details below:

- Email: info@trafficiq.co.uk
- Post: Traffic IQ Limited, 182-184 High Street North, Office 11388, London, England, E6 2JA

Traffic IQ may need additional information to verify identity and will handle requests within the statutory time limits applicable to the request.

16. Personal data breaches

A personal data breach includes, for example, accidental loss, unauthorised disclosure, unauthorised access, alteration or destruction of personal data.

Anyone who becomes aware of a suspected breach must report it promptly to the designated data protection contact. Traffic IQ will:

- record and assess the incident;
- contain and investigate it;
- assess risks to affected individuals;
- take appropriate remedial action;
- notify the ICO where legally required and within the applicable statutory timeframe; and
- notify affected individuals where legally required or otherwise appropriate.

17. Monitoring, CCTV and technology

Traffic IQ does not currently use CCTV, GPS/vehicle tracking, biometric systems or other monitoring technologies. Should this change, Traffic IQ will assess the purpose, lawful basis and proportionality before implementation.

18. Automated decision-making and profiling

Traffic IQ will identify whether any processing involves solely automated decision-making, including profiling, that produces legal or similarly significant effects. Where such processing is used, Traffic IQ will comply with the applicable UK GDPR requirements and provide the information required by law.

19. Training and responsibilities

The Managing Director is the policy owner and is accountable for overall compliance with this policy. Dillon Turay as Managing Director, holds the role of Data Protection Lead for Traffic IQ Limited.

All personnel must follow this policy and report suspected breaches or inappropriate processing promptly.

- Managers must ensure that personal data is accessed only for legitimate business purposes.
- Personnel handling sensitive information must receive appropriate training.

- Service providers handling personal data must be subject to appropriate contractual and security controls.
- New processing activities will be assessed before implementation, particularly where they involve sensitive data, systematic monitoring, large-scale processing or other high risks.

20. Complaints and ICO

Individuals have a statutory right to complain to Traffic IQ directly about how their personal data has been processed. Traffic IQ will acknowledge complaints within 30 days and will handle them in accordance with its complaint-handling procedure and the requirements introduced by the Data (Use and Access) Act 2025.

Individuals also have the right to complain to the Information Commissioner's Office (ICO) if they believe their personal data has been handled unlawfully.

Traffic IQ Limited will maintain a valid data protection registration with the ICO as required by UK law.

ICO website: ico.org.uk | ICO helpline: 0303 123 1113

ICO registration number: **C1911395**

21. Policy governance and review

This policy will be reviewed at least annually and sooner where there is a material change to legislation, regulatory guidance, business activities, processing purposes, systems, suppliers or risk profile.

Traffic IQ will update its privacy information before introducing a new use of personal data where required by applicable data protection law.

22. Related documents and records

- Data Protection / GDPR Procedure
- Records Retention Schedule
- Data Breach / Incident Response Procedure
- Subject Access Request Procedure
- Right to Work Policy
- Drug and Alcohol Policy
- Equal Opportunities Policy
- Agency Worker Policy

Signature	 Dillon Turay Managing Director
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Date: 23/08/2026