



Data Processing Record

Best Companies Services

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Data Processing Record

Best Companies Limited

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This record has been created to meet the requirements of the UK General Data Protection Regulation; Article 30, as amended by applicable UK data protection legislation, including the Data (Use and Access) Act 2025, where relevant, and to explain how personal data is processed when a Client uses Best Companies services. It sets out the responsibilities of the Client, Employee and Best Companies, the lawful basis relied on, the purposes of the processing, and the safeguards used to protect personal data. It is intended to support transparency, accountability and consistent understanding of the processing activity.

Errors and omissions: This record has been prepared in good faith to reflect Best Companies’ understanding of the relevant processing activities, roles, responsibilities and safeguards at the time of review. If any error, omission or material change is identified, Best Companies will review and update the record as appropriate.

Document Control and Review

Classification	Public
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Review frequency	At least annually, or sooner where there is a material change to the processing activity, service, supplier arrangements, lawful basis, retention period, international transfer position or risk profile.

Name and Contact Details

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ICO Registration No: Z8349843.

Data Protection Officer: Eleanor Blore. Email: privacy@b.co.uk. Tel: 01978 856 222.

EU Representative: Best Companies has instructed Rickert Law as its EU Representative in accordance with Article 27 of the GDPR for EU supervisory authorities and EU citizens.

Email: art-27-rep-bestcompanies@rickert.law

Post: Rickert Rechtsanwaltsgesellschaft mbH, Best Companies Limited, Colmantstraße 15, 53115 Bonn, Germany.

Client: The person, firm, company or organisation requesting the service and, by accepting the terms of service agreement, choosing to use the Best Companies service. The Client is the controller for the personal data it provides to Best Companies.

Employee: An employee or worker of the Client whose personal data may be provided by the Client and/or collected directly by Best Companies through the survey process.

Best Companies: Best Companies Limited acts as a separate controller for survey responses and related statistical, benchmarking and research processing where it determines the purposes and means of that processing. For activities, including the administration of a survey, where the Client provides Employee Data, Best Companies is a data processor.

Notes

This document will be maintained, saved and provided to our Clients, EU Representative and, where requested, Supervisory Authority(s). Each party to the services shall maintain a record of the categories of processing activities carried out.

For the avoidance of doubt, Best Companies will process the data as a Separate data controller. This is completed under the lawful basis of legitimate interest.

The Client will not have sole controller responsibility for the service, even though it initiates the work by commissioning the report. Best Companies also has controller responsibility where it independently determines what information is collected and processed to deliver the service, conduct statistical analysis and benchmarking, and maintain the integrity of the methodology. This reflects UK Information Commissioner's Office guidance. To support transparency and fairness, Best Companies contractually requires the Client to assist in delivering the "Best Companies Privacy Notice" so Employees understand that Best Companies is also a controller of their personal data.

Client Lawful Basis

The Client, as controller, is responsible for determining and documenting the appropriate lawful basis for its own processing activity before requesting and using the Best Companies services. For the majority of Clients, this is expected to be either legitimate interests or public interest, depending on the nature of the organisation and the purpose for which the reporting is used.

Where a Client purchases additional services such as workshops, the Client remains responsible for confirming that the selected lawful basis is appropriate for the nature of the services, the level of detail provided, and the way the organisation intends to use any outputs.

Personal Data

The personal data requested and shared between the parties has been considered against the data minimisation principle and should be limited to what is necessary and proportionate for the services purchased, the survey delivery required and the reporting outputs selected by the Client.

Fields may include mandatory fields required for all survey types, such as first name, surname, employee reference or unique identifier, survey type required, email address, eligibility for Accreditation, workplace or reporting office postcode, reporting manager, employment group and job grade or level. Optional fields may include date of birth, start date, contracted weekly hours, annual salary, sex, working from home arrangements and other demographic or organisational reporting fields where these are relevant to the reporting package purchased or the insight the Client expects to receive.

The resource "[Requirement Considerations for Fields of Data Being Shared](#)" should be read alongside this record. It explains why each field may be requested, whether it is mandatory or optional, how it supports survey delivery, reporting, Accreditation or recognition services, and how the request aligns with data minimisation, retention and privacy by design.

Where optional demographic fields are not provided in advance by the Client, they may be presented to employees as part of the survey. Employees are not required to answer these optional questions and may choose to skip them or select "prefer not to say" where available. Pre-populating relevant demographic fields can reduce the number of questions asked during the survey and support more accurate, reliable and complete reporting.

The Client provides pre-populated fields to support delivery of the survey, including a unique identifier for each data subject to avoid duplication and relevant demographic information where reasonable. Best Companies then conducts statistical analysis and benchmarking across its client database regionally, nationally and by sector.

As set out in the Best Companies Terms of Service, personal data provided by the main controller requesting the services remains personal data for which the Client is the data controller and Best Companies is the data processor. Personal data collected directly from individual survey respondents means Best Companies is the sole and separate data controller of all survey responses.

Categories of Data Subjects

- Client employees and workers invited to complete the b-Heard survey.
- Client project leads, administrators and authorised users involved in survey set-up, reporting access or service management.
- Managers and people leaders, where Elevate or manager-level reporting is purchased and enabled.
- Prospective or existing Client contacts associated with accreditation, recognition, publishing partner activity or Best Companies events, where relevant.
- Individuals who register for Best Companies events, where relevant.

Categories of Personal Data

Category	Examples
Identity and contact data	First name, surname, email address and employee number or unique identifier.
Employment and organisational data	Employment group, reporting manager, job grade or level, survey type required, eligibility for Accreditation and reason for not surveying, where applicable.
Location and reporting data	Workplace or reporting office postcode and other reporting structure information relevant to the services purchased.
Optional demographic or reporting data	Date of birth, start date, contracted weekly hours, annual salary, sex, working from home arrangements and other optional fields where relevant to the reporting package purchased.
Survey response data	Responses submitted directly by employees through the b-Heard survey, including engagement responses and optional survey questions.
Manager and team insight data	Manager, team and leadership insight data generated through Elevate where the service is purchased and enabled.
Workshop, event and publishing contact data	Name, organisation, phone number, email address and organisation address where needed for publishing activities or workshop and event participation.

Controller and Processor Role Summary

Processing activity	Client role	Best Companies role	Lawful basis
Employee upload data used to set up and administer the survey	Controller	Processor	Client determines and documents its lawful basis.
Survey responses submitted directly by employees	Not included as part of Client Dataset	Independent controller	Legitimate interests
Anonymous or aggregated reporting to the Client	N/A – no personal data	Independent controller for producing the reporting outputs	Legitimate interests for creating analysis and reporting.
Benchmarking, methodology integrity, accreditation assessment and compatible research	N/A – no personal data	Independent Controller	Legitimate interests and compatible further processing for statistical, historical and research purposes. Whilst personal data is held.
Publishing partner or event contact data, where relevant	Controller where it provides, attendees, project lead contact details	Processor for Client Workshop or controller for events dependent on event and/or publishing activity	Legitimate interests, unless another basis applies to a specific event or activity.

Description of the Processing

Purpose: Best Companies services fulfil two purposes for organisations that work with us:

- Insightful reporting, to help organisations understand employee engagement, leadership effectiveness and organisational health, inform their people strategy, and identify areas of strength, risk and opportunity for improvement; and
- Recognition, evaluation for an accolade, including Accreditation and Best Companies to Work For lists

Services: Best Companies provides employee engagement survey services, workplace insight and reporting, accreditation and recognition assessment, benchmarking, research and, where selected by the Client, additional insight services such as Elevate, workshops, events and related support

designed to help organisations understand and improve employee engagement, leadership effectiveness and organisational health.

Clients are responsible for considering and documenting their lawful basis for using Best Companies services to understand employee engagement, workplace experience, organisational health and, where relevant, manager or team-level insight. Unless specifically advised otherwise, the Client has selected legitimate interests as its lawful basis.

Best Companies administers the data received from the Client to deliver the services selected by the Client. This may include the b-Heard survey, workplace insight and reporting, Elevate where purchased and enabled, workshops, events, accreditation and recognition assessment, benchmarking, methodology integrity checks and compatible research.

To provide anonymous and aggregated reporting to the Client, Best Companies, acting as a separate controller, conducts statistical analysis and benchmarking across its client database nationally, by sector and regionally. Depending on the service selected, this may support the production of a Best Companies Index (BCI) Score, Predicted Best Companies Index (PBCI) Score, workplace insight outputs, Elevate insight, accreditation assessment and consideration for Best Companies lists where the relevant eligibility criteria are met.

Best Companies has a Legitimate Interest for further research such as historical and statistical purposes, providing benchmarking and data analysis as data controller.

The further processing of data Best Companies conducts can reasonably be determined as compatible with the original purpose. The UK GDPR specifically states that further processing for scientific research purposes and statistical purposes should be considered compatible lawful processing operations.

Balance Assessment for Legitimate Interest

Sharing of data is achieved on the legal basis of Legitimate Interest.

The legal basis for data processing is Legitimate Interest. Best Companies has conducted a Legitimate Interests Assessment to ensure the decision is justified. The UK GDPR acknowledges that organisations may have a legitimate interest in processing data as long as the processing does not have a disproportionate impact on the individual. On balance, the legal basis of legitimate interest against the individual impact means the services are reasonable, the Client organisation interests in the services appear compelling, and there is little impact on the individual. The additional research conducted by Best Companies is considered compatible under data protection law.

It is reasonable to expect that the anonymous reporting data provided to the Client, based on the collective individual responses, should benefit not only the employer but every employee across the organisation. This is in consideration of the ability for employers to better support their staff to become happier and more productive, increase publicity for the organisation by being recognised as a Best Company, assist in retaining existing talent and attracting top talent through PR and

marketing opportunities, and measure employee engagement to inform the people strategy and improve engagement.

The additional research conducted by Best Companies greatly assists employers with understanding how employee engagement impacts their organisation, produces best practice content, provides the ability for comparative historical research, and provides learning for the benefit of wider society in the form of white papers, case studies and articles.

Methodology

The processing is underpinned by the Best Companies Methodology, which is used to assess all organisations.

The modelling of the methodology looks for statistically improbable survey response patterns. This is to ensure the integrity of fair competition and meaningful reporting.

The process using the Best Companies methodology will exclude surveys where they are following certain patterns. Insight on the reasons a survey may be excluded can be considered in the article [“How we ensure the integrity of the data we report upon”](#).

To ensure fair competition for all organisations being evaluated, and to protect the integrity of our services, Best Companies would not look to reverse a decision based on the methodology. To ensure no organisation is placed at a competitive advantage, disclosure of when a survey has been excluded or the specific reason for exclusion will not be disclosed. The methodology ensures we fulfil the purpose for organisations requesting Best Companies services.

Elevate

How Elevate differs from standard reporting: Elevate is distinct from standard organisation-level reporting. Standard reporting provides anonymous, organisation-level insight to support the Client’s people strategy. Elevate provides more detailed manager and team-level insight through Manager Insights and the Management Report, where purchased and enabled by the Client organisation.

Unlike standard organisation reporting, Manager Insights and the Management Report are not fully anonymous because they can display results linked to a manager or team. Where the Client organisation chooses to enable these features, star ratings and scores may be visible, including the People Leadership Index, Index scores, Element scores and Sub-element scores.

Use of AI within Elevate: Elevate includes AI functionality within the application to support managers and people leaders in interpreting insight data. The AI functionality may generate summaries of survey results and insight data, highlight key themes and patterns, and suggest coaching prompts or potential next steps. The purpose is to support constructive, development-focused conversations and help managers understand insights more efficiently. The AI provides supportive guidance only and does not make decisions. Client data is not used to train, fine-tune or improve the underlying AI models.

The People Leadership Index and associated scoring are calculated using predefined scoring logic and are not AI-driven. The AI functionality operates separately and is limited to interpretive and coaching-support outputs.

Data used to deliver Elevate: The Client organisation will share data required for the processing, including but not limited to employee name, reporting manager name or payroll number, and information identifying whether an individual manages employees. Personal data will also be collected directly from employees completing the survey. Survey responses submitted by employees completing the survey will inform the reporting.

The Client organisation project leads will review the reporting structure to ensure employees are aligned correctly to the reporting manager. Managers will also have the opportunity to verify their direct reports before manager and team-level reporting is finalised.

Automated processing and profiling: Elevate involves automated processing, including profiling, to generate manager and team-level insights where the service is purchased and enabled by the Client. The scores, ratings and related calculations within Elevate are generated through the Best Companies methodology and predefined scoring logic, not by AI. The AI functionality within Elevate operates separately and is limited to supportive and interpretive outputs, such as summaries, themes, coaching prompts and suggested next steps. This processing supports insight, reporting, development conversations, organisational improvement and coaching. It does not involve solely automated decision-making by Best Companies, and Best Companies does not consider this processing to be high risk when the documented safeguards are applied.

Best Companies relies on legitimate interests for this processing where it has assessed that the processing is necessary, proportionate and balanced against the rights and freedoms of individuals. The assessment takes into account the nature of the insight generated, the purpose of the service, the safeguards included within Elevate, and the controls set out in Best Companies' "[Artificial Intelligence in Best Companies](#)" resource.

Safeguards include layered transparency through privacy information, Client review of the reporting structure, manager verification of direct reports, predefined scoring logic, role-based access, appropriate human involvement, AI outputs being supportive and interpretive only, and the ability for a manager to request a manual review, provide their perspective and challenge the outcome. Client data is not used to train, fine-tune or improve the underlying AI models.

Purpose and benefits of Elevate: On balance, Best Companies has reasonably determined that Elevate supports the Client organisation by providing a more detailed understanding of manager and team-level insight, enabling development conversations, action planning and continuous improvement.

Elevate is intended to support leadership development by helping managers understand areas of strength and areas for development, improve organisational clarity, strengthen team cohesion and relationship building, and encourage managers to take ownership of their ongoing development. The service may also support those on their journey into management by providing insight that helps them become future-ready leaders.

Review and challenge: Should a manager disagree with the results, they can request a manual review, provide their perspective and challenge the outcome to support fairness and transparency.

Diversity Monitoring

Best Companies offers two forms of diversity related survey content, depending on the Client's requirements and the services selected.

Diversity monitoring statements: Best Companies can include, on request, a series of diversity monitoring statements. These are intended to help the Client better understand employee experience, inclusion and workplace sentiment without collecting special category data. Employees respond to statements rather than being asked to provide demographic characteristics, which supports a lower risk approach where the Client wants insight without collecting diversity demographics.

Diversity survey: Where a Client, organisation or sector has identified a duty, requirement or evidence need to collect certain demographic information, the Client may select a diversity survey. Depending on the questions selected, this may involve collecting special category data. Employee consent is collected as part of the diversity survey at the point of surveying before those responses are used for anonymous reporting.

Employees have a clear and free choice when completing the diversity survey, including the option to abstain at question-level where available. Diversity survey responses are reported anonymously and do not become part of the Client's own dataset. Where diversity survey data supports equality monitoring, evidence-based decision-making or equality of opportunity or treatment within an organisation, the processing is carried out with appropriate transparency, employee choice and reporting safeguards.

Research and Further Processing

Best Companies conducts its own processing of data collected for benchmarking purposes. Best Companies may also conduct historical, scientific and statistical research to further understand the factors that influence employee engagement. This includes inspecting, cleansing, transforming and modelling the data held by Best Companies with the aim of identifying trends, producing insight, suggesting conclusions and supporting decision-making.

Best Companies may conduct data analysis on behalf of third parties, such as organisations seeking further insight or correlations in how the data collected compares with other organisations in their sector or nationally. Best Companies also conducts its own independent research, which may be made publicly available. All reporting to other parties, and any publicly available reporting, is anonymous. No personal data is shared with third parties for these research outputs, and data rendered anonymous is not considered personal data under data protection legislation.

Best Companies relies on legitimate interests for further processing where it can reasonably be considered compatible with the original purpose. UK data protection legislation, including the UK GDPR, recognises that further processing for research and statistical purposes may be compatible

lawful processing. To protect the rights and freedoms of data subjects, responses provided to Best Companies as a separate controller do not become part of a Client dataset. Employees are provided with “Best Companies’ Privacy Notice” to support fair and transparent surveying.

Data Subject Rights and Transparency

Best Companies provides layered privacy information to support transparency, including privacy information on its website, survey communications and information presented during the survey journey. The Client is contractually required to assist with delivery of the “Best Companies Privacy Notice” before survey participation so Employees understand how their data will be processed and that Best Companies acts as a separate controller for survey responses.

Employees may exercise their data protection rights by contacting Best Companies at privacy@b.co.uk. Survey responses are not returned to the Client as identifiable responses, which supports confidentiality and helps employees respond honestly.

Individuals may also raise a complaint or concern about how their personal data has been processed by contacting Best Companies at privacy@b.co.uk. Best Companies will review and respond to data protection complaints through its internal data protection process, in line with applicable UK data protection complaint handling requirements, including those introduced by the Data (Use and Access) Act 2025 where relevant. Individuals may also raise a complaint with the Information Commissioner’s Office if they remain dissatisfied.

DPIA and Risk Assessment Position

The processing activity has been considered against the rights and freedoms of data subjects. The core b-Heard survey processing is not expected to result in a high risk to individuals when the documented safeguards, transparency measures, access controls, anonymised reporting and retention arrangements are applied. Where additional services involve automated processing, profiling, AI functionality, diversity monitoring or more detailed manager and team-level insight, the risk position should be assessed and documented as part of the relevant product, service or Client implementation review.

Retention by Data Type

Data type	Retention position
Client upload data and personal identifiers	Retained for up to three years following the lapse of the subscription term, unless anonymisation is requested sooner by the Client.
Survey responses before anonymisation	Retained as needed to deliver reporting, benchmarking, methodology integrity, accreditation assessment and compatible research purposes.

Anonymised or statistical data	Retained indefinitely where individuals are no longer identifiable and the data is no longer personal data.
Backups	Azure configuration backups are maintained within Azure for six months, with automated deletion. Barracuda also retains backups for business continuity and recovery purposes, including backups of relevant Azure data and configurations, SharePoint data and any remaining on-premise configurations where applicable. Barracuda backups are retained for three months and are subject to documented retention and deletion controls.
Event or publishing contact data	Retained only for as long as necessary for the relevant event, publishing, profile, case study or related legitimate business purpose.

On request, Best Companies can reconfigure personal data held from previous years' participation to correlate reports following organisational restructure or change. If a Client does not require Best Companies to retain personal identifiers for this period, a written request can be made for the personal data to be anonymised. This is completed within one month. Best Companies will not accept a request to extend the retention period.

Vulnerable Employees

Best Companies expects the Client to identify any vulnerable employee and consider that individual's capacity to complete the b-Heard survey in the purchased format and understand the "Best Companies Privacy Notice". Where the standard method of delivering the "Privacy Notice" may not be appropriate, the Client should contact Best Companies for assistance or an alternative version.

Best Companies has set the minimum age for its services at 16 years of age. This has been applied to protect the rights and freedoms of a child, as individuals aged 15 and under may not have the capacity to understand how their data may be used and could be unduly influenced.

General Overview of Security Measures

Best Companies processes personal data securely by means of appropriate technical and organisational measures, having taken into consideration the state of the art and costs of implementation. Best Companies has an information security policy and has taken steps to make sure the policy is implemented. To ensure availability and continued operations, Best Companies also has a business continuity plan.

Encryption: All data is encrypted in transit using 256-bit encryption algorithms and all websites use a 4,096-bit public key. All websites are HTTPS. All backups with Barracuda and Microsoft Azure are encrypted at rest. All laptops with Windows OS are Microsoft BitLocker encrypted with TPM, while those with macOS are encrypted with FileVault. On the rare occasion a USB pen is required in the business, these are also encrypted and logged in and out.

Multifactor Authentication (MFA): Authorised users that need to access the network externally do so through VPN and are required to log in with their password and a one-time use generated password. MFA is also available at company-level for Clients accessing Best Companies applications, and Best Companies recommends that Clients enable and use this control.

Office Security: To break into the offices someone would have to go through multiple locked doors and override a modern alarm system. There is internal and external CCTV recording 24/7 with partial motion detection. Recordings are kept for 30 days. There is electrified fencing at the rear of the offices.

Backups: Backups are taken at the end of every working day. Backups are kept securely with Barracuda Networks for three months and encrypted at rest in a UK data centre. Backups of the Azure setup are also maintained in Azure, with six-monthly backups kept at a time and 30 days of daily backups. All backup data is encrypted in transit.

Development: All development code is peer reviewed before being pushed to a staging environment. It is then checked by front-end users to help catch development issues before they reach the live server. Code is checked for security, performance and functionality. Dynamic vulnerability testing and static source code security scanning and review are performed through www.mend.io.

Availability: Best Companies has considered its services and does not classify them as business-critical services requiring a high availability or failover model. The cloud processors used by Best Companies provide contractual uptime commitments and service availability assurances; however, Best Companies does not operate an automatic failover arrangement for these cloud services.

Vulnerability Assessment and Penetration Tests: Best Companies instructs an external company to perform an annual vulnerability assessment and penetration test and, should they find any issues, Best Companies will ensure these are rectified without undue delay. Best Companies conducts quarterly network perimeter scans and frequently reviews its security posture through Security Scorecard, which is reported to the board as an agenda item.

Access: All data is only accessible by Best Companies authorised personnel. Restrictions apply to users designated on customer accounts and third parties who can access the information only in specific and limited circumstances, and who are bound by confidentiality agreements.

Services of Sub-Processors

Best Companies works with other organisations to enable it to provide the service. These third-party suppliers perform functions that may be considered sub-processing under applicable data protection laws. All sub-processors have undergone due diligence and have written contracts in place relevant to the data processing.

Further information is available in the Best Companies resource: [Who Are Best Companies Data Processors, Or Your Sub-Processors?](#)

Categories of Recipients

- Authorised Best Companies personnel who require access to deliver, support, secure or administer the services.
- Approved sub-processors who support the delivery, hosting, communication, security, backup or operational management of the services.
- Client authorised users who receive access to anonymous, aggregated or permitted reporting outputs.
- Publishing partners, where a Client is included on a list and contact is necessary for profile or case study activity.
- Event platform providers or event suppliers, where an individual registers for a Best Companies event.
- Supervisory authorities, regulators, legal advisers or other recipients where disclosure is required by law or necessary to establish, exercise or defend legal rights.

International Transfers and Safeguards

Best Companies is based in the United Kingdom and the data processors assisting Best Companies in processing personal data are located within the UK and EEA. Personal data used to deliver services for Clients in the European Region is processed within the UK and EEA. No personal data will be transferred outside the European Region for the provision of services where the personal data has been provided from within the European Region. For EEA clients, where personal data is transferred from the EEA to the UK, Best Companies relies on the applicable adequacy decision while it remains in force. Clients should confirm the current status of adequacy decisions periodically to ensure ongoing compliance.

Rest of World: Where services extend to countries outside of the European Region, personal data will be transferred, stored and processed within the European Region. This includes personal data received by Best Companies whether collected directly or indirectly from data subjects. Where an organisation operates outside the UK or within a country without a UK adequacy decision and an international transfer agreement is required, requests should be sent to privacy@b.co.uk where applicable.

Workshops and Events

Where a Client is considered for, or included in, The Best Companies to Work For Lists, Best Companies may share limited Client contact details with third parties who assist with related activity. This is limited to what is necessary for the relevant purpose, such as name, organisation, phone number, email address and organisation address. The lawful basis for this processing is legitimate interests.

Best Companies events include, but are not limited to, workshops, insight sessions and celebrations. Best Companies may on occasion invite individuals associated with Best Companies to register for events on the lawful basis of legitimate interests. Best Companies is the controller of personal data it receives directly from individuals who register for events. Best Companies may also use third-party suppliers to assist with the planning, administration, filming, delivery or hosting of workshops, events and related activities. Where those suppliers process personal data on behalf of Best Companies, appropriate due diligence, contractual controls and data protection terms are applied.

Data Flows

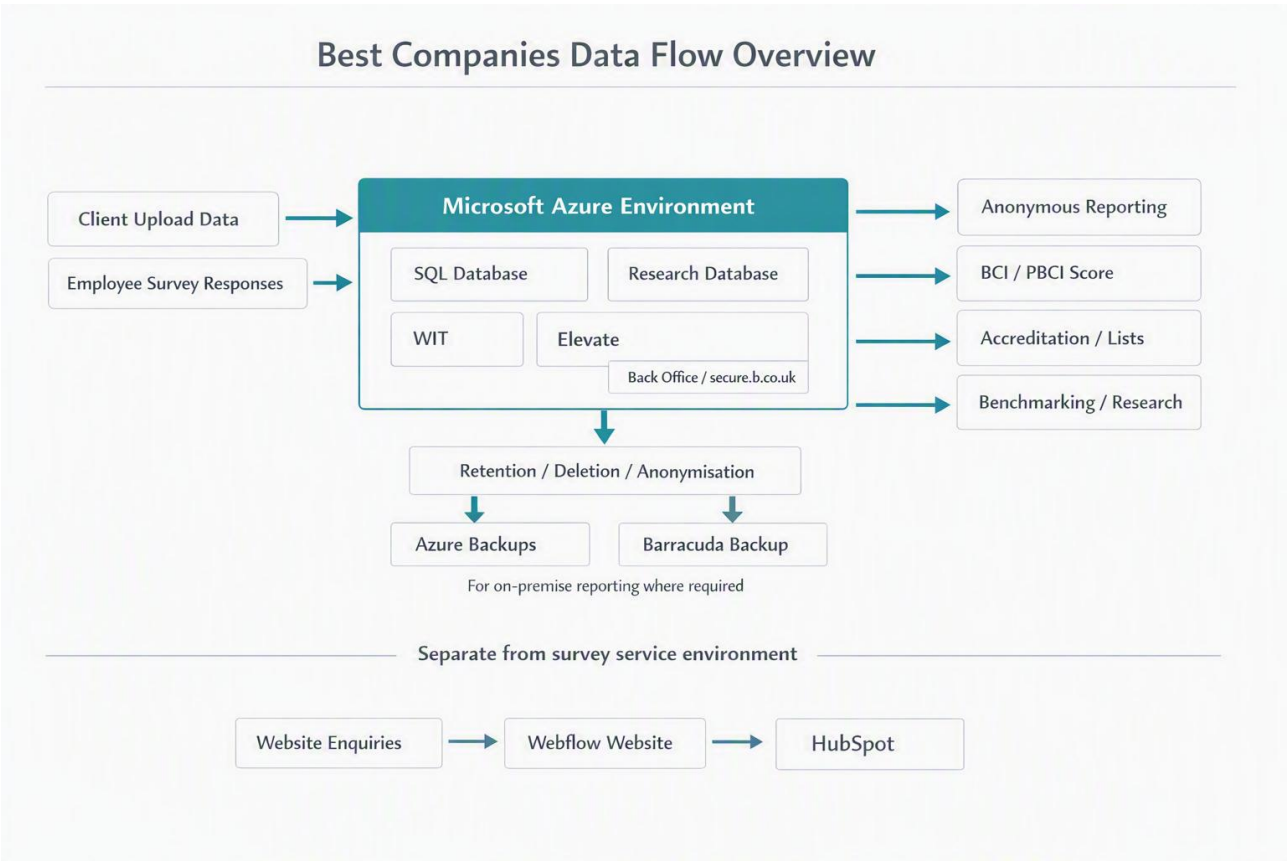


Illustration note: This AI-generated Best Companies Data Flow Overview is provided for illustrative purposes only. It shows the general flow of personal data across Best Companies services and is not intended to represent every technical component, system integration, support process, supplier interaction or Client specific configuration.

Data Transfers to Best Companies

Client to Best Companies: Personal data is securely uploaded by the Client via the Best Companies dashboard. Where additional assistance is required, the Client should contact Best Companies, who will provide instructions for supplying the data through Zivver.

Data subject to Best Companies: Employees receive an email invitation containing a unique link and login details to the b-Heard survey. The email comes from survey@b.co.uk and is personalised to the employee. Alternative options may be accommodated on request.

Personal data is collected from the Client to support the provision of the selected services and to enable Best Companies to invite employees to complete the b-Heard survey. Employees then submit their survey responses directly to Best Companies. Survey administration data, survey responses, calculations and reporting outputs are processed within the Best Companies Microsoft Azure environment, including SQL databases and relevant applications such as Workplace Insights and Elevate. Backup arrangements are managed through Best Companies' documented backup processes. Barracuda is used to back up relevant Azure data, SharePoint data and any data retained on Best Companies' on-premise environments, where applicable. Backups are encrypted and retained in line with the documented backup retention period.

Live websites are hosted on Microsoft Azure, with the main data centre in UK South, London. The developer system where code is stored is in Azure Amsterdam and may include client data where manual script changes are needed, or details may be stored on work items in Azure DevOps.

The public marketing website, www.b.co.uk, is externally hosted via Webflow and is separate from the Best Companies Azure environment, service platforms, dashboards, survey tools and databases. It does not process personal data relating to the delivery of survey services, but enquiry and interest-capture forms transfer submitted personal data into HubSpot for follow-up by Best Companies.

Client Data and Employee Engagement Data are retained in accordance with documented retention periods. Client Data is automatically deleted up to three years following the lapse of the subscription term. Once Client Data is deleted, remaining survey respondent data has lost personal identifiers and is rendered anonymous, leaving statistical data only. Azure configuration backups are maintained for six months with automated deletion.