



PRIVACY POLICY

1. What is the purpose of this document?

The Company is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR). It applies to all employees and workers.

The Company is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice. This notice applies to current and former employees and workers. This notice does not form part of any contract of employment or other contract to provide services. The Company may update this notice at any time.

It is important that you read this notice, together with any other privacy notice the Company may provide on specific occasions when the Company is collecting or processing personal information about you, so that you are aware of how and why we are using such information.

2. Data protection principles

The Company will comply with data protection law. This says that the personal information the Company holds about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that the Company has clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes the Company has told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes the Company has told you about.
- Kept securely.

3. The kind of information the Company holds about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). There are “special categories” of more sensitive personal data which require a higher level of protection.

The Company may collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Gender.
- Marital status and dependants.
- Next of kin and emergency contact information.
- National Insurance number.
- Bank account details, payroll records and tax status information.
- Salary, annual leave, pension and benefits information.
- Start date.
- Location of employment or workplace.
- Copy of driving licence.
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process).

- Employment records (including job titles, work history, working hours, training records and professional memberships).
- Performance information.
- Disciplinary and grievance information.
- CCTV footage and other information obtained through electronic means.
- Information about your use of our information and communications systems.
- Photographs.

The Company may also collect, store and use the following “special categories” of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences.

4. How is your personal information collected?

The Company typically collects personal information about employees and workers through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. The Company may sometimes collect additional information from third parties including former Company’s, credit reference agencies or other background check agencies such as the Disclosure and Barring Service. The Company will collect additional personal information in the course of job-related activities throughout the period of you working for us.

5. How the Company will use information about you

The Company will only use your personal information when the law allows the Company to. Most commonly, the Company will use your personal information in the following circumstances:

1. Where the Company needs to perform the contract the Company has entered into with you.
2. Where the Company needs to comply with a legal obligation.
3. Where it is necessary for the Company’s legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
4. The Company may also use your personal information in the following situations, which are likely to be rare:
 - Where the Company needs to protect your interests (or someone else’s interests).
 - Where it is needed in the public interest or for official purposes.

Situations in which we will use your personal information

The Company needs all the categories of information in the list above (see the kind of information the Company holds about you) primarily to allow the Company to perform the contract with you and to enable the Company to comply with its legal obligations. In some cases the Company may use your personal information to pursue legitimate interests of its own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which the Company will process your personal information are listed below:

- Making a decision about your recruitment or appointment.
- Determining the terms on which you work for the Company.
- Checking you are legally entitled to work in the UK.
- Paying you and deducting tax and National Insurance contributions.
- Providing benefits to you.
- Liaising with your pension provider.
- Administering the contract, the Company has entered into with you.
- Business management and planning, including accounting and auditing.
- Conducting performance reviews, managing performance and determining performance requirements.
- Making decisions about salary reviews and compensation.
- Assessing qualifications for a particular job or task, including decisions about promotions.
- Gathering evidence for possible grievance or disciplinary hearings.
- Making decisions about your continued employment or engagement.
- Making arrangements for the termination of our working relationship.

- Education, training and development requirements.
- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work.
- Ascertaining your fitness to work.
- Managing sickness absence.
- Complying with health and safety obligations.
- To prevent fraud.
- To monitor your use of our information and communication systems to ensure compliance with our IT policies.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- To conduct data analytics studies to review and better understand employee retention and attrition rates.
- Equal opportunities monitoring.

Some of the above grounds for processing will overlap and there may be several grounds which justify the Company's use of your personal information.

If you fail to provide personal information

If you fail to provide certain information when requested, the Company may not be able to perform the contract it has entered into with you (such as paying you or providing a benefit), or the Company may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

Change of purpose

The Company will only use your personal information for the purposes for which the Company has collected it, unless the Company reasonably considers that it needs to use it for another reason and that reason is compatible with the original purpose. If the Company needs to use your personal information for an unrelated purpose, the Company will notify you and the Company will explain the legal basis which allows it to do so.

Please note that the Company may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. How the Company uses particularly sensitive personal information

"Special categories" of particularly sensitive personal information require higher levels of protection. The Company needs to have further justification for collecting, storing and using this type of personal information. The Company may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations and in line with the Company's policies.
3. Where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme, and in line with the Company's policies.
4. Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.

Less commonly, the Company may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

Our obligations as a Company

The Company will use your particularly sensitive personal information in the following ways:

- The Company will use information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws.
- The Company will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits.

- The Company will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

Do we need your consent?

The Company does not need your consent if it uses special categories of your personal information in accordance with its written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, the Company may approach you for your written consent to allow the Company to process certain particularly sensitive data. If the Company does so, it will provide you with full details of the information that the Company would like and the reason it is needed, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

7. Information about criminal convictions

The Company may only use information relating to criminal convictions where the law allows it to do so. This will usually be where such processing is necessary to carry out our obligations and provided the Company does so in line with its policies.

Less commonly, the Company may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

The Company will only collect information about criminal convictions if it is appropriate given the nature of the role and where the Company is legally able to do so. Where appropriate, the Company will collect information about criminal convictions as part of the recruitment process or the Company may be notified of such information directly by you in the course of you working for us.

8. Data sharing

The Company may have to share your data with third parties, including third-party service providers, where required by law, where it is necessary to administer the working relationship with you or where the Company has another legitimate interest in doing so.

The Company requires third parties to respect the security of your data and to treat it in accordance with the law.

9. Data security

The Company have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, the Company limits access to your personal information to those employees, agents, contractors and other third parties who have a business need to know.

The Company have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where the Company is legally required to do so.

10. Data retention

The Company will only retain your personal information for as long as necessary to fulfil the purposes the Company collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. In some circumstances the Company may anonymise your personal information so that it can no longer be associated with you, in which case the Company may use such information without further notice to you. Once you are no longer an employee or worker of the Company, the Company will retain and securely destroy your personal information in accordance with applicable laws and regulations.

11. Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information the Company holds about you is accurate and current. Please keep the Company informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information the Company holds about you and to check that the Company is lawfully processing it.
- Request correction of the personal information that the Company holds about you.
- Request erasure of your personal information.
- Object to processing of your personal information where the Company is relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where the Company is processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that the Company transfers a copy of your personal information to another party, please contact your manager in writing.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, the Company may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, the Company may refuse to comply with the request in such circumstances.

What the Company may need from you

The Company may need to request specific information from you to help the Company confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact your manager.

12. Changes to this privacy notice

The Company reserves the right to update this privacy notice at any time, and the Company will provide you with a new privacy notice when it makes any substantial updates. The Company may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact your manager.

Date of Issue: March 2019	Signed: 
Date of Next Review: January 2020	Print Name: B Algate