

Employee Privacy Policy

1 PURPOSE

In accordance with the General Data Protection Regulation (GDPR), we have implemented this privacy notice to inform you, our employees, of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

2 SCOPE

This notice applies to current and former employees and workers.

3 DATA PROTECTION PRINCIPLES

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- processing is fair, lawful and transparent
- data is collected for specific, explicit, and legitimate purposes
- data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- data is not kept for longer than is necessary for its given purpose
- data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- we comply with the relevant GDPR procedures for international transferring of personal data

4 DATA PROTECTION OFFICER

The Company's Data Protection Officers are The People Team

5 ROLES AND RESPONSIBILITIES

Senior Managers:

- determining what personal data is held by their area
- ensuring that data is secure and controlled
- ensuring that personal data is password protected

Data Protection Officers (The People Team):

- monitoring compliance with GDPR, other data protection laws
- acting as a point of contact for the Information Commissioner's Office
- providing employees with guidance on data protection
- reporting any breaches of data protection

Employees:

- observing all guidance relating to personal data
- not disclosing any personal data to third parties
- ensuring personal data is kept secure, sent securely

6 TYPES OF DATA HELD

We keep several categories of personal data on our employees to ensure effective and efficient management of HR processes. Personal, employment, and recruitment information is securely stored in PeopleHR, our GDPR-compliant HR system.

Specifically, we hold the following types of data, as appropriate to your status:

- **Personal Details:** name, address, contact numbers, photograph, next of kin, gender, marital status and information on any disabilities or medical conditions.
- **Employment Details:** National Insurance number, bank account details, tax information, right to work documentation, criminal convictions (if applicable), driving licence, job title, job description, salary and wider terms and conditions
- **Recruitment Information:** CV's, cover letters, references, education and employment history, and any information provided during the recruitment process
- **Equality Monitoring Information:** data on race and religion, gender
- **Security and Access Information:** CCTV footage, building access card records, IT equipment use including telephones and internet access.

7 COLLECTING YOUR DATA

You provide several pieces of data to us directly during the recruitment period and subsequently upon the start of your employment.

In some cases, we will collect data about you from third parties, such as employment agencies, former employers when gathering references or credit reference agencies.

Personal data is kept in files or within the Company's People and IT systems.

8 LAWFUL BASIS FOR PROCESSING

The law on data protection allows us to process your data for certain reasons only. In the main, we process your data in order to comply with a legal requirement or in order to effectively manage the employment contract we have with you, including ensuring you are paid correctly.

The information below categorises the types of data processing, appropriate to your status, we undertake and the lawful basis we rely on.

Activity requiring your data	Lawful basis
Carry out the employment contract that we have entered into with you e.g. using your name, contact details, education history, information on any disciplinary, grievance procedures involving you	Performance of the contract
Ensuring you are paid	Performance of the contract
Ensuring tax and National Insurance is paid	Legal obligation
Carrying out checks in relation to your right to work in the UK	Legal obligation
Making reasonable adjustments for disabled employees	Legal obligation
Making recruitment decisions in relation to both initial and subsequent employment e.g. promotion	Our legitimate interests
Making decisions about salary and other benefits	Our legitimate interests
Ensuring efficient administration of contractual benefits to you	Our legitimate interests
Effectively monitoring both your conduct, including timekeeping and attendance, and your performance and to undertake procedures where	Our legitimate interests
Maintaining comprehensive up to date personnel records about you to ensure, amongst other things, effective correspondence can be achieved and appropriate contact points in the event of an emergency are maintained	Our legitimate interests

Activity requiring your data	Lawful basis
Implementing grievance procedures	Our legitimate interests
Assessing training needs	Our legitimate interests
Implementing an effective sickness absence management system including monitoring the amount of leave and subsequent actions to be taken including the making of reasonable adjustments	Our legitimate interests
Gaining expert medical opinion when making decisions about your fitness for work	Our legitimate interests
Managing statutory leave and pay systems such as maternity leave and pay etc	Our legitimate interests
Business planning and restructuring exercises	Our legitimate interests
Dealing with legal claims made against us	Our legitimate interests
Preventing fraud	Our legitimate interests
Ensuring our administrative and IT systems are secure and robust against unauthorised access	Our legitimate interests
Providing employment references to prospective employers, when our name has been put forward by the employee/ex-employee, to assist with their effective recruitment decisions	Legitimate interest of the prospective employer

9 SPECIAL CATEGORIES OF DATA

Special categories of data are data relating to your:

- a) health
- b) sex life
- c) sexual orientation
- d) race
- e) ethnic origin
- f) political opinion
- g) religion
- h) trade union membership
- i) genetic and biometric data.

We carry out processing activities using special category data:

- a) for the purposes of equal opportunities monitoring
- b) in our sickness absence management procedures
- c) to determine reasonable adjustments

Most commonly, we will process special categories of data when the following applies:

- a) you have given explicit consent to the processing
- b) we must process the data in order to carry out our legal obligations
- c) we must process data for reasons of substantial public interest
- d) you have already made the data public.

10 FAILURE TO PROVIDE DATA

Your failure to provide us with data may mean that we are unable to fulfil our requirements for entering into a contract of employment with you. This could include being unable to offer you employment or administer contractual benefits.

11 CRIMINAL CONVICTION DATA

We will only collect criminal conviction data where it is appropriate given the nature of your role and where the law permits us. This data will usually be collected at the request of a client.

We rely on the lawful basis of this request based on the reason provided to us by our client to process this data.

12 WHO WE SHARE YOUR DATA WITH

Employees within our company who have responsibility for recruitment, administration of payment and contractual benefits and the carrying out performance-related procedures will have access to your data which is relevant to their function. All employees with such responsibility have been trained in ensuring data is processing in line with GDPR.

We may also share your data with third parties as part of a Company sale or restructure, or for other reasons to comply with a legal obligation upon us. We have a data processing agreement in place with such third parties to ensure data is not compromised. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

We do not share your data with bodies outside of the European Economic Area.

13 PROTECTING YOUR DATA

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

14 RETENTION PERIODS

Your data will not be kept longer than we need it for legitimate purposes i.e. legal, accounting, reporting or regulatory requirements.

15 AUTOMATED DECISION MAKING

Automated decision-making means making decision about you using no human involvement e.g. using computerised filtering equipment. No decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

16 EMPLOYEE RIGHTS

You have the following rights in relation to the personal data we hold on you:

- a) the right to be informed about the data we hold on you and what we do with it;
- b) the right of access to the data we hold on you. (Subject Access Request Form)
- c) the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as 'rectification' (Data Rectification Request Form)
- d) the right to have data deleted in certain circumstances. This is also known as 'erasure (Data Erasure Request Form)
- e) the right to restrict the processing of the data (Data Restriction Request Form)
- f) the right to transfer the data we hold on you to another party. This is also known as 'portability (Data Portability Request Form)
- g) the right to object to the inclusion of any information (Data Objection Request Form)

17 CONSENT

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data.

18 MAKING A COMPLAINT

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.

RELATED DOCUMENTS

The following documents can be found in PeopleHR (Documents)

- GDPR Policy

The following forms can be requested from the People Team

- Subject Access Request Form
- Data Rectification Request Form
- Data Erasure Request Form
- Data Portability Request Form
- Data Objection Request Form
- Data Restriction Request Form

Signed:


Greg Scott

Managing Director

Date: 2/06/2026

This policy will be reviewed annually and updated as necessary in response to changes in employment law or company requirements