

## Employee Privacy Notice – Gledhill 2018

This document provides further information about how GA - UK & ROI collects and uses personal information whilst you are working for us and after you have left to manage the employment relationship. It applies to current and former employees, consultants, interns, apprentices, agency workers, work experience placements and directors together referred to as 'Employees' or 'you'.

We are required by data protection law to give you the information in this Privacy Notice. It is important that you read the Privacy Notice carefully, together with any other information that we might give you from time to time about how we collect and use your personal data. You should also read our Data Protection Policy which explains our obligations in relation to personal data and how we keep it secure, as well as what we expect from you when you are handling personal data in the course of your work.

This Privacy Notice applies from 25 May 2018, when the General Data protection Regulation comes into force. We may update this Privacy Notice at any time. This version of our Privacy Notice was last updated 17 May 2018.

### Who is the controller?

GA - UK & ROI is the “controller” for the purposes of data protection law. This means that we are responsible for deciding how we hold and use personal data about you. Your point of contact for the Company is John Glanville, Chief Communications Officer.

This Privacy Notice also covers how Groupe-Atlantic uses any personal data about you that we share with them (for more information, see the Table in the Appendix, **Who we share your data with**) Groupe-Atlantic is the controller of any personal data they hold and use about you. Groupe-Atlantic applies the same high standards to data protection compliance as we do.

### What type of personal data do we hold about you?

Personal data means any information relating to a living individual who can be identified (directly or indirectly) in particular by reference to an identifier (e.g. name, NI number, employee number, email address, physical features). It can be factual (e.g. contact details or date of birth), an opinion about an individual's actions or behaviour, or information that may otherwise impact that individual in a personal or business capacity.

We hold and use various types of personal data about you, including, for example: biographical details; recruitment information; details of the terms of your employment with us; pay and benefits details; working hours; performance information; details of your holidays and other leave; disciplinary, conduct and grievance matters; employee representation; health and safety; CCTV footage; business equipment, technology and systems usage information, etc.

Data protection law divides personal data into two categories: ordinary personal data and special category data. Any personal data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health conditions, sexual life or sexual orientation, or biometric or genetic data that is used to

identify an individual is known as **special category data**. The rest is **ordinary personal data**.

We hold and use various types of special category data about you, including: sickness absence and medical information; details of family leave which could include information about your health, marital status; equal opportunities monitoring data which could include information about your race or ethnicity; trade union membership.

### **Why do we hold your personal data and on what legal grounds?**

We hold and use your ordinary personal data for employment, HR and business administration purposes. This will include, for example: management of our employment relationship with you; administration of pay and benefits; monitoring and assessment of performance; provision and regulation of holidays and other leave; addressing conduct, disciplinary and grievance issues; performance of day-to-day business activities, etc.

Data protection law specifies the legal grounds on which we can hold and use personal data.

Most commonly, we rely on one or more of the following legal grounds when we process your personal data:

- Where we need it to perform the contract we have entered into with you (**performance of the contract**) whether this is an employment contract, a contract for services or another type of contract. This may include, for example, ensuring that we pay you correctly and that we provide your contractual holiday entitlement.
- Where we need it to comply with a legal obligation (**legal obligation**). Typically, this may include legal obligations such as the obligation: to provide statutory holidays and statutory family leave and pay (maternity, paternity, adoption, shared parental, etc.); to pay the National Living Wage /National Minimum Wage; to comply with limits on working time; to meet health and safety requirements; not to discriminate or dismiss Employees unfairly.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests (**legitimate interest**). This may include, for example, managing working hours to ensure effective business operations, and monitoring your use of computers or other technology.

We hold and use your special category data for purposes including, for example: managing absence and ensuring cover; making adjustments to your job to accommodate health conditions; facilitating the taking of family related leave; paying sick pay, maternity, paternity, adoption or shared parental pay as applicable; monitoring equality of opportunity and diversity in our organisation; paying trade union subscriptions, facilitating meetings with trade union representatives, permitting time off for trade union activities; ensuring security of laptops/controlling access to our premises.

Since special category data is usually more sensitive than ordinary personal data, we need to have an additional legal ground to use and hold it. Most commonly, as well as one of the legal grounds listed above, we rely on one or more of the following additional legal grounds when we process your special category data:

- Where we need to exercise our legal rights or carry out our legal obligations in relation to employment or social security and the processing is in line with our Data Protection Policy **(legal obligation/right in relation to employment)**
- Where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme, and in detecting and preventing unlawful acts and in line with our Data Protection Policy **(public interest in monitoring equal opportunities within the workforce)**
- Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards **(assessment of working capacity)**

Occasionally, we may also hold and use ordinary personal data: in the public interest for the detection or prevention of crime; or where needed to protect your vital interests or those of another person. We may also occasionally hold and use special category data: to establish, exercise or defend a legal claim; where needed to protect your interests (or someone else's interests) where you are not capable of giving your consent; or where you have already made the information public.

Sometimes we may use your personal data for purposes that are different from or incompatible with those for which we collected it. If we do this, we will notify you and explain our legal ground for using your data in this way, as required under data protection law.

The Appendix to this Privacy Notice sets out in more detail the types of ordinary and special category personal data we collect and hold about you, what we use it for, who we share it with and the relevant legal grounds under data protection law for doing so.

### **Where we collect your information**

You provide us with most of the personal data about you that we hold and use. Other personal data about you we hold and use is generated by you in the course of carrying out your duties. For example, during email correspondence or when producing documents or when you are using certain equipment such as computers and fob entry records.

Some of the personal data we hold and use about you is provided by or generated from internal sources during the course of running our business. For example, colleagues may refer to you in emails or documents, your manager will assess you as part of the appraisal process and information about you may be generated as part of our business and operational planning.

Some of the personal data about you that we hold and use may come from external sources. For example: when we offered you a job, we may have collected references from previous employers; we may ask for a report from an occupational health professional if you have long-term sickness absence; customers may give feedback about you; we might seek advice from a professional adviser that includes information about you; or your Trade Union representative might correspond with us in particular situations.

### **If you give us someone else's personal data**

Sometimes, you might provide us with another person's personal data – e.g. details of your beneficiaries. In such cases, we require you to inform the individual what personal data of

theirs you are giving to us. You must also give them our contact details and let them know that they should contact us if they have any queries about how we will use their personal data.

### **Who may we share your information with?**

We will only share your personal data with third parties where we have an appropriate legal ground under data protection law which permits us to do so. Commonly, this could include situations where we are legally obliged to provide the information (e.g. to HMRC for tax purposes), to comply with our contractual duties (e.g. to providers of your contractual benefits such as occupational pension, health insurance, etc.), or where it is necessary in our legitimate interest (e.g. to manage the contractual relationship).

Further details of who we share your personal data with, and our purposes and legal grounds for doing so, are set out in the Appendix to this Privacy Notice.

### **Consequences of not providing personal data**

We only ask you to provide personal data when we have a good reason and there may therefore be consequences if you do not provide particular information to us.

Some of the personal data you provide to us is required by law. For example, if you do not provide your national insurance number, we will not be able to make correct tax/NI deductions on PAYE, and, if you are pregnant, we require a MATB1 in order to pay statutory maternity pay.

We may require you to provide other personal data, where it is necessary for us or our pensions/benefits providers to fulfil our contractual obligations to you, or for you to fulfil your contractual obligations to us, or where our use of the data is necessary in our legitimate interests. For example, if you do not complete the application form for health insurance, we cannot provide you with health insurance.

If you choose not to provide us with personal data requested, we will tell you about the particular implications of any such decision at the relevant time.

### **Where your information is processed.**

Some processing may also involve transferring personal data to countries outside the European Economic Area (the "EEA"). These countries may not offer the same level of protection for personal data as provided within the EEA so we will put in place appropriate safeguards, and require the organisations we deal with to do the same.

### **How we protect your information**

The company takes the security of your data seriously. The organisation has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employee in the performance of their duties. Any personal information which is collected, recorded or used in any way, whether on paper or electronically, will have appropriate safeguards applied in line with our data protection obligations.

Where the company engages third parties to process personal data on its behalf, they do so on the basis of written instruction, are under a duty of confidentiality and are obliged to implement appropriate technical and organisation measure to ensure the security of data.

### **How long we keep your information**

We will not keep your personal data for longer than we need it for our legitimate purposes.

We take into account the following criteria when determining the appropriate retention period for Employees' personal data:

- the amount, nature, and sensitivity of the personal data
- the risk of harm from unauthorised use or disclosure
- the purposes for which we process your personal data and how long we need the particular data to achieve these purposes
- how long the personal data is likely to remain accurate and up-to-date
- for how long the personal data might be relevant to possible future legal claims
- any applicable legal, accounting, reporting or regulatory requirements that specify how long certain records must be kept

Given the variety of Employees' personal data that we use and the varying circumstances in which we use it, it is difficult to specify ahead of time precisely how long we will keep particular items of personal data. Where possible, the Tables in the Appendix to this Privacy Notice identify retention periods applicable to your personal data, which have been determined on the basis of the above criteria and which represent the longest period for which we will ordinarily keep it. We may often keep particular items of your personal data for less time. However, there may also be circumstances in which it is appropriate for us to keep particular items of your personal data for a longer period than that set out in the Tables. In particular, we will always keep your personal data for so long as we are required to do so under legal, accounting, reporting or regulatory requirements.

In addition, for some types of personal data, it is more appropriate to decide retention periods on a case by case basis (also using the criteria described above), and this is indicated in the Tables where applicable.

We will base these decisions on relevant circumstances, taking into account the criteria listed above.

### **Your rights**

You have a number of legal rights relating to your personal data, which are outlined here:

- The right to make a subject access request. This enables you to receive certain information about how we use your personal data, as well as to receive a copy of it and to check that we are lawfully processing it.
- The right to request that we correct incomplete or inaccurate personal data that we hold about you.
- The right to request that we delete or remove personal data that we hold about you where there is no good reason for us continuing to process it. You also have the

right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).

- The right to object to our processing your personal data where we are relying on our legitimate interest (or those of a third party), where we cannot show a compelling reason to continue the processing
- The right to request that we restrict our processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- The right to request that we transfer your personal data to you or to another party, in a structured format. This right applies in respect of data that you have provided where our legal ground for using the data is that it is necessary for the performance of a contract or that you have consented to us using it (this is known as the right to “data portability”).

Our Data protection Policy outlines how you may exercise any of the above rights. Note that these rights are not absolute and in some circumstances we may be entitled to refuse some or all of your request.

If you have any questions or concerns about how your personal data is being used by us, you can contact John Glanville, Chief Communications Officer.

Note too that you have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues. Details of how to contact the ICO can be found on their website: <https://ico.org.uk>

## APPENDIX - FURTHER DETAILS FOR GLEDHILL EMPLOYEES

**This section of the Privacy notice tells you in more detail about the type of personal data we hold about you, what we use it for, our legal grounds for doing so, who we share it with and how long we keep it.**

Please note that we will not necessarily hold, use or share *all* of the types of personal data as described in this Appendix in relation to you. The specific types of data about you that we will hold, use and share will depend on your role, the terms on which you work for us, your individual circumstances and circumstances affecting the company from time to time. For example, if you do not have a work computer or use any other technical device in your role, we will not hold any computer or device usage records for you; if you have not taken a day off sick, we will not currently hold any sickness absence records for you; and we are only likely to share information about you with professional advisers in particular circumstances.

Note also that the first 2 Tables below divide items of personal data into relatively broad categories (under heading “Type of ordinary personal data held by us”). Where multiple purposes and/or legal ground for our use of a given “type” of personal data are identified, this does not necessarily mean that *all* of the purposes and/or legal grounds are applicable to *all* items of personal data falling within that “type” of personal data.

### More information about your ordinary personal data

Type of ordinary personal data held by us	What we use it for	Legal ground	Guideline retention period
Basic personal information and contact details (including name, address, date of birth, gender, marital status, telephone number and emergency contact details).	To allow the organisation to maintain accurate employee records and contact details, and emergency contact details for Employee welfare in the event of an emergency; for administration of the contract, gender for Gender Pay reporting, DOB for pension administration; for HR and business administration purposes and defence against potential legal claims.	Necessary for the performance of a contract or to enter into a contract.  Necessary for compliance with a legal obligation.  Necessary for the legitimate interests of the organisation – In our legitimate interest to hold emergency contact details in order to inform a person nominated by you in an emergency situation.	During employment and up to 6 years after employment ends.  Emergency contacts: during employment and up to 6 months after employment ends.
Recruitment records (including CVs, interview notes, test results, proof of right	To assess an individual's suitability for work and to determine to whom to	Necessary for the performance of a contract or to enter into a contract.	During employment and up to 6 years after employment ends.

<p>to work in UK (such as passports and visas), driving licence, evidence of skills and qualifications, DBS check).</p>	<p>offer employment; to comply with legislative and regulatory requirements; for HR and business administration purposes and defence against potential legal claims.</p>	<p>Necessary for compliance with a legal obligation.</p> <p>Necessary for the legitimate interests of the organisation - to maintain relevant and appropriate records of recruitment for business administration and administration of employment.</p>	
<p>Employment details (including start date, location, job title and career history).</p>	<p>For administration of the contract and our relationship with Employees on an ongoing basis; details about role/ experience etc. may be used in communications within the Group and in communications with customers and potential customers.</p>	<p>Necessary for the performance of a contract or to enter into a contract.</p> <p>Necessary for compliance with a legal obligation.</p> <p>Necessary for the legitimate interests of the organisation - to manage ongoing relationships and promote services to customers and potential customers.</p>	<p>During employment and up to 6 years after employment ends.</p>
<p>Payroll &amp; Induction information (including pay and benefits entitlements, bank details, national insurance number, proof to work in UK (such as passports and visas) driving licence and partner's driving licence (if company vehicle includes personal use).</p>	<p>To pay employees and make appropriate tax payments and keep appropriate records; for HR and business administration, and financial planning purposes and defence against legal claims.</p>	<p>Necessary for the performance of a contract or to enter into a contract.</p> <p>Necessary for compliance with a legal obligation.</p>	<p>During employment and up to 6 years after employment ends.</p>



<p>Working hours and arrangements.</p>	<p>To pay employees correctly and comply with legal requirements regarding working time and for operational management.</p>	<p>Necessary for the performance of a contract or to enter into a contract.</p> <p>Necessary for compliance with a legal obligation.</p> <p>Necessary for the legitimate interests of the organisation - to manage working hours/ arrangements to ensure effective business operations.</p>	<p>During employment and up to 6 years after employment ends.</p>
<p>Pension records (including name, marital status, address, DOB, Salary, Pension age and beneficiaries).</p>	<p>To make appropriate pension payments; to comply with Legislative and regulatory requirements; for HR &amp; pension administration purposes and to allow Trustees to assess an individual's eligibility for drawing a pension; to allow the discharge of life assurance benefits; for auditing and reporting of Company pension schemes.</p>	<p>Necessary for the performance of a contract or to enter into a contract.</p> <p>Necessary for compliance with a legal obligation.</p> <p>Necessary for the legitimate interests of the company - to analyse benefits and make decisions about Company pension provision and appropriate life assurance payments.</p>	<p>During employment and 30 years after employment ends.</p>

<p>Performance records (including appraisal documents, probation and performance reviews, targets and objectives, performance improvement plans, records of capability meetings and related correspondence, and warnings).</p>	<p>To maintain a record of the operation of performance improvement processes; for HR and business administration purposes and defence against potential legal claims.</p>	<p>Necessary for the performance of a contract or to enter into a contract.</p> <p>Necessary for compliance with a legal obligation.</p> <p>Necessary for the legitimate interests of the organisation -to manage performance and roles to ensure effective business operations and set appropriate levels of remuneration.</p>	<p>During employment and up to 6 years after employment ends.</p>
<p>Qualifications and Training Records (including educational vocational training).</p>	<p>To ensure Employees are appropriately qualified and trained for current or potential roles.</p>	<p>Necessary for the performance of a contract or to enter into a contract.</p> <p>Necessary for compliance with a legal obligation.</p> <p>Necessary for the legitimate interests of the company - to ensure that there are appropriate qualifications and training for current or potential roles.</p>	<p>During employment and up to 6 years after employment ends.</p>
<p>Holidays and other leave (including leave taken, leave requests and responses).</p>	<p>To manage statutory and non-statutory holiday and leave.</p>	<p>Necessary for the performance of a contract or to enter into a contract.</p> <p>Necessary for compliance with a legal obligation.</p> <p>Necessary for the legitimate interests of the organisation - to ensure leave taken is compatible with business requirements and that any consequent</p>	<p>During employment and up to 6 years after employment ends.</p>

		operational adjustments are made.	
Disciplinary and grievance records (including records of investigations which may include witness statements, CCTV site footage and surveillance information; notes of disciplinary or grievance meetings and appeal hearings, correspondence with employees and warnings).	To maintain a record of the operation of disciplinary and grievance procedures and their outcome; for HR and business administration purposes and defence against potential legal claims.	<p>Necessary for the performance of a contract or to enter into a contract.</p> <p>Necessary for compliance with a legal obligation.</p> <p>Necessary for the performance of a task in the public interest - in detecting and preventing unlawful acts.</p> <p>Necessary for the legitimate interests of the organisation - to deal effectively with disciplinary, conduct or grievance matters whether Employees are the subject of them or otherwise connected to the issues raised.</p>	During employment in accordance with our disciplinary and grievance policies, and up to 6 years after employment ends.
Employee representation.	Establishing and facilitating consultation with staff forum and GMB on relevant matters.	<p>Necessary for compliance with a legal obligation.</p> <p>Necessary for the legitimate interests of the organisation - to engage with appropriate Employee representatives on relevant matters.</p>	During employment and up to 6 years after employment ends.

<p>Health and Safety.</p>	<p>Conducting risk assessments; establishing safety measures to mitigate identified risks; providing a safe working environment; keeping required records for BSI Audit and HSE including accident reports and training records.</p>	<p>Necessary for compliance with a legal obligation.</p> <p>Necessary for the legitimate interests of the organisation - to ensure Employees are able to perform their duties in a safe environment for the efficient operation of the business.</p>	<p>Case by case basis in accordance with criteria set out in Employee Privacy Notice, in particular any legal requirement to retain particular information.</p>
<p>Changing terms of employment or termination of employment (including offer letters, contracts of employment and related correspondence).</p>	<p>Administration of the contract, making changes to the terms of employment to fit business requirements; managing relationships with Employees on an ongoing basis including during notice, promotions, role changes, and other career progression; termination of the working relationship however instigated; managing post-employment issues; for defence against potential legal claims.</p>	<p>Necessary for the performance of a contract or to enter into a contract.</p> <p>Necessary for compliance with a legal obligation.</p> <p>Necessary for the legitimate interests of the organisation - to manage, alter and where relevant, to terminate the contractual relationship or respond to resignations and deal effectively with post-employment issues.</p>	<p>During employment and up to 6 years after employment ends.</p>

<p>CCTV footage.</p>	<p>Primarily for security purposes, although we may also use CCTV footage when investigating allegations of misconduct by Employees (see Disciplinary and grievance records).</p>	<p>Necessary for the performance of a contract or to enter into a contract.</p> <p>Necessary for compliance with a legal obligation.</p> <p>Necessary for the performance of a task in the public interest - in detecting and preventing unlawful acts.</p> <p>Necessary for the legitimate interests of the organisation - to deal effectively with allegations of misconduct and to maintain the security of our premises.</p>	<p>60 days after date on which footage was recorded.</p> <p>External cameras over railway indefinitely.</p>
<p>Information about Employee use of business equipment, technology and systems including computers, desk telephones, mobile phones, software, applications, social media, fob entry system, performance output recording, time recording on Optim.</p>	<p>Maintaining the operation, security and integrity of business communications systems (e.g. protection from hackers, malware, etc); providing IT and communications systems support; preventing excessive personal use; recording communications with customers for quality control and training purposes; keeping premises secure; Fire safety; recording efficiency of work.</p>	<p>Necessary for compliance with a legal obligation.</p> <p>Necessary for the legitimate interests of the organisation - to maintain operation, security and integrity of communication systems and adherence to IT Usage Policy; providing IT and communications systems support; to monitor and maintain quality of communications with customers; record time worked and efficiency of work.</p>	<p>ServiceDesk system, Active Directory &amp; Emails during employment and 30 days after employment ends.</p> <p>Web browsing and email security 30 days from date information captured</p> <p>Call recording of customer calls 18 months from date recorded</p> <p>Back up tapes 5 years</p>

<p>Personal data produced by Employees in the course of carrying out their duties (e.g. job-related emails, minutes of meetings, written reports, business social media presence etc.)</p>	<p>To carry out the business of the company.</p>	<p>Necessary for the performance of a contract or to enter into a contract.</p> <p>Necessary for compliance with a legal obligation.</p> <p>Necessary for the legitimate interests of the organisation - to carry out the company business.</p>	<p>Case by case basis in accordance with criteria set out in Employee Privacy Notice.</p>
<p>Personal data that is relevant to strategic decision making processes, to planning business operations, actual and potential legal claims, corporate reporting and business risk analysis.</p>	<p>To carry out the company business, analyse current business performance, plan for the future, present information in reports to relevant audiences such as Group company, protect the company from legal claims, and seek professional advice as and when required in the course of running our business.</p>	<p>Necessary for the performance of a contract or to enter into a contract.</p> <p>Necessary for compliance with a legal obligation.</p> <p>Necessary for the legitimate interests of the organisation - to carry out the company business, including taking strategic decisions in the interests of the business, communicating about the business with relevant audiences and seeking professional advice where appropriate.</p>	<p>Case by case basis in accordance with criteria set out in Employee Privacy Notice.</p>

### More information about your special category data

<b>Type of special category personal data held by us</b>	<b>What we use it for</b>	<b>Legal ground</b>	<b>Special category legal ground</b>	<b>Guideline retention period</b>
<p>Absence records containing (including details of absence taken, the reasons for absences, information about medical or health conditions, reasonable adjustments, drug and alcohol testing, records of absence management discussions such as Return to Work Interviews, correspondence with employees).</p>	<p>To maintain a record of the operation of absence procedures and ensure that employees receive statutory and contractual sick pay or other pay entitlements and benefits; to meet health and safety obligations and comply with the requirement to make reasonable adjustments; for HR and business administration purposes and defence against potential legal claims.</p>	<p>Necessary for the performance of a contract or to enter into a contract.</p> <p>Necessary for compliance with a legal obligation.</p> <p>Necessary for the legitimate interests of the organisation - to manage Employees with health conditions, to comply with requirement to make reasonable adjustments, maintain a safe working environment and to manage sickness absence of the workforce and ensure appropriate cover.</p>	<p>Necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment.</p> <p>Necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent.</p> <p>Necessary for the purposes of preventative medicine or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or management of health care systems.</p>	<p>During employment and up to 30 years after employment ends.</p>

<p>Family leave including maternity, paternity, adoption and shared parental leave, parental leave and time off for dependents (which could include information about Employee health and sexual orientation).</p>	<p>To maintain a record of leave and ensure appropriate cover; to ensure that employees receive statutory and contractual pay entitlements (such as maternity or other family-related pay and benefits).</p>	<p>Necessary for the performance of a contract or to enter into a contract</p> <p>Necessary for compliance with a legal obligation</p> <p>Necessary for the legitimate interests of the organisation - to manage absences and ensure appropriate cover.</p>	<p>Necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment.</p> <p>Necessary for the purposes of preventative medicine or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or management of health care systems.</p>	<p>During employment and up to 6 years after employment ends.</p>
<p>Trade Union Membership</p>	<p>To make payment of trade union subscriptions via payroll deductions; facilitating meetings with union representatives for collective bargaining purposes and compliance with legal obligations to allow time off for trade union activities, training etc.</p>	<p>Necessary for compliance with a legal obligation.</p> <p>Necessary for the legitimate interests of the organisation - to engage with Trade Union representatives and manage and facilitate time off, etc. for trade union activities.</p>	<p>Necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment.</p>	<p>During employment and up to 6 years after employment ends.</p>



<p>Equal opportunities and diversity including information about race or ethnicity.</p>	<p>To monitor equality of opportunity and diversity in the organisation and comply with company policies.</p>	<p>Necessary for the legitimate interests of the organisation - to understand how the organisation is doing with regard to diversity and equal opportunities.</p>	<p>Necessary for reasons of substantial public interest.</p>	<p>During employment and up to 6 years after employment ends.</p>
<p>Criminal convictions/offences.</p>	<p>If a criminal conviction of an Employee comes to light, to investigate and assess the impact, if any, on their continued employment (see Disciplinary Policy).</p>	<p>Necessary for the performance of a contract or to enter into a contract.</p> <p>Necessary for compliance with a legal obligation.</p> <p>Necessary for the legitimate interests of the organisation - to determine whether to employ individuals with criminal convictions in particular roles e.g driving bans for Sales and service roles, vulnerable customers for Service engineers.</p>	<p>Relates to personal data which are manifestly made public by data subject.</p> <p>Necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.</p> <p>Necessary for reasons of substantial public interest.</p>	<p>During employment and up to 6 years after employment ends.</p>

<p>Occupational Health records containing special categories of personal data (including base-line medical records with details of any disabilities or medical conditions disclosed and any reasonable adjustments; health monitoring information including hearing and lung function tests, first aid treatment, referrals for treatment such as counselling, physiotherapy and reflexology and related reports and correspondence with external practitioners or GP's).</p>	<p>To assess suitability for work; to meet Health &amp; Safety obligations and comply with the requirements to provide reasonable adjustments; for HR &amp; business administration processes and defence against legal claims.</p>	<p>Necessary for compliance with a legal obligation.</p> <p>Necessary for the legitimate interests of the organisation - to manage Employees with health conditions, to comply with requirement to make reasonable adjustments, maintain a safe working environment and defence against legal claims.</p>	<p>Necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment.</p> <p>Necessary for the purposes of preventative medicine or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or management of health care systems.</p>	<p>During employment and up to 30 years after employment ends.</p>
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<p>Insurance records including name, address, NI, DOB and special categories of data (such as details of injuries, absences and information about medical or health conditions and health monitoring records).</p>	<p>To provide life assurance cover for all employees; the defence or acceptance of liability in Civil Claims; to meet Health &amp; Safety obligations; for HR and business administration purposes.</p>	<p>Necessary for legitimate interests of the organisation - for defence against legal claims &amp; to provide life assurance cover for all employees</p>	<p>Health data processing for diagnosis, treatment or social care purposes.</p> <p>Necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent.</p> <p>Necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.</p>	<p>Life assurance: Up to 3 years after employment ends.</p> <p>Health &amp; Safety: During employment and up to 30 years after employment ends.</p>
<p>Basic personal and health information and contact details for Work experience under the age of 16 (including name, address, date of birth, telephone number and emergency contact details, existing health conditions).</p>	<p>To allow the organisation to maintain accurate emergency contact details for Employee welfare in the event of an emergency; to comply with the requirements to provide reasonable adjustments; for HR and business administration purposes and defence against potential legal claims.</p>	<p>Necessary for compliance with a legal obligation.</p> <p>Necessary for the legitimate interests of the organisation - to inform an Employee nominated person in an emergency situation; to ensure placements are able to perform their duties in a safe environment.</p>	<p>Necessary for the purposes of preventative medicine or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or management of health care systems.</p>	<p>For length of placement and up to 6 months after it ends.</p>

## More information about how we share your personal data

Who we share your personal data with	What data we share	Why we share it	Legal ground
Groupe- Atlantic	Name, Job title, Start date, category of job, reporting lines	For Group headcount and demographic statistics	In our legitimate interest to manage the business
Payroll department	Basic personal information and induction information, Holidays and other leave and absence, Pension membership and other benefits, changing terms of employment and working hours	To pay employees and make appropriate tax and pension payments; to ensure the correct payment of statutory and contractual leave and absence	Necessary for the performance of the contract or to enter into a contract Necessary for compliance with a legal obligation
Police	CCTV footage; basic personal information and contact details	Requirement to help with investigations	Necessary for the performance of a task in the public interest – in detecting and preventing unlawful acts
Pension administrators – Scottish Widows / The Peoples Pension	Pension and beneficiary records Information about health conditions in relation to ill-health retirement	To enable the service provider to provide and administer pension benefits	Necessary for the performance of the contract or to enter into a contract Necessary for compliance with a legal obligation In our legitimate interest in the discharge of pension and life assurance benefits In relation to special category data - health data processing for diagnosis, treatment and social care purposes
Our legal and other professional advisers appointed from time to time	Any of your personal data that is relevant	To obtain legal or other professional advice about matters related to you or in the course of dealing with legal disputes with you or other	Necessary for the performance of the contract or to enter into a contract Necessary for compliance with a legal obligation

		Employees; to obtain advice on business management and planning, including accounting advice; to independently audit our accounts	In our legitimate interest to seek professional advice to clarify our rights/obligations and appropriately defend ourselves from potential claims; to manage the business and its finances In relation to special category data – legal obligation/right in relation to employment; defending legal claims
Fleet administrator – Total Motion	Driving licence and accident details	To administer the company car scheme	Necessary for the performance of a contract or to enter into a contract Necessary for compliance with a legal obligation
Legal authorities and regulators e.g. HMRC, HSE, BSI	Pay, tax and NI details; accident reporting and H&S records	To comply with regulatory and legal obligations	Necessary for compliance with a legal obligation In relation to special category data – Legal obligation/right in relation to employment; assessment of working capacity
Insurance companies and brokers e.g. Amlin, AON	Any of your personal data that is relevant	In the defence of Civil Claims and to provide life assurance cover for all employees	In our legitimate interest to provide life assurance cover In relation to special category data – legal obligation/right in relation to employment; defending legal claims; assessment of working capacity; health data processing for diagnosis, treatment and social care purposes; Vital interests.
Occupational health professionals/medical professionals	Details of your sickness absences, information we already have about	To seek a medical report about you in accordance with our sickness and absence	Necessary for compliance with a legal obligation

	your health/medical conditions as relevant	policy and to carry out assessments required by health and safety legislation	In our legitimate interest to manage sickness, absence and health issues arising in our workforce In relation to special category data – Legal obligation/right in relation to employment; assessment of working capacity
Potential purchasers/new service providers	Any of your personal data that is relevant	To provide relevant information to prospective purchasers or new service providers in the event of a possible business transfer, a business or share sale, takeover or other corporate transaction	Legal obligation In our legitimate interest to consider/proceed with a transfer/sale of the business and information is required by prospective purchasers
Customers, potential customers, shareholders and interested parties	Any of your personal data that is relevant, including in particular business contact details, information about role and experience	Inclusion in corporate reports, for use in business communications, to obtain security clearance to work on customers' premises	Legal obligation In our legitimate interest to communicate about the business and our Employees to appropriate audiences, which include customers, potential customers, shareholders and other interested parties
Third parties at your request	Employment details as relevant	At your request, to provide a reference to a potential new employer/details of your employment to a mortgage or letting company etc	In our legitimate interest/that of the third party recipient to action reasonable requests by you to provide your personal data to third parties with your consent