



## **Data Protection Privacy Notice**

This non-contractual notice explains what personal data (personal information) we hold about you, how we collect it, and how we use and may share personal information during your employment and/or engagement and after it ends. Please ensure that you read this notice (sometimes referred to as a 'privacy notice') and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

### **Who collects the personal information**

The Company is a 'data controller' and gathers and uses certain personal information about you.

### **Data protection principles**

The data protection principles which we will apply when gathering and using personal information are set out in our Data Protection Policy which is available in the Accounts Office or the Sawmill.

### **About the personal information we collect**

A table summarising the personal information we collect and hold, how and why we do so, how we use it and with whom it may be shared is attached to this notice.

Personal information may be shared with other parties, such as external contractors and our professional advisers, including legal and financial advisors, and pension and benefit providers, and potential purchasers of some or all of our business or on a re-structuring. The recipient of the personal information will be bound by confidentiality obligations. We may also be required to share some personal information to comply with the law.

We seek to ensure that our personal information collection and processing is always proportionate. We will notify you of any changes to personal information we collect or to the purposes for which we collect and process it.

### **Where personal information may be held**

Personal information may be held at our offices and third-party agencies, service providers, representatives and agents as described above and in cloud based IT services (such as Sage payroll, Microsoft OneDrive, Dropbox and Mailchimp). Where information is held in cloud based IT services, the Cloud based IT device has confirmed that it has appropriate safeguards in place. For example, in respect of Microsoft OneDrive which transfers data to the US, Microsoft are certified under the Trans-Atlantic Data Privacy Framework.

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

We keep personal information during and after your employment and/or engagement for no longer than is necessary and in the majority of cases for no more than 6 years after the end of your employment and/or engagement. Please see our Data Protection Policy for further information.

### **Your rights to correct and access your personal information and to ask for it to be erased**

Please contact our Data Protection Contact (Alison Bond, Director, on 07730 308 691 or at [alison@whbond.co.uk](mailto:alison@whbond.co.uk)) if (in accordance with applicable law) you would like to correct or request access to personal information that we hold or if you have any questions about this notice. You also have the right to ask our Data Protection Contact for some, but not all, of the personal information we hold and process to be erased (the 'right to be forgotten') in certain circumstances.

### **Keeping your personal information secure**

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing personal information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

### **How to complain**

We hope that we can resolve any query or concern you raise about our use of your personal information. If not, contact the Information Commissioner at [ico.org.uk/concerns/](http://ico.org.uk/concerns/) or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

The table below sets out the information we collect in respect of employees. If you are engaged as a contractor, we may collect information about you such as your name, contact details and financial information. This information will be collected from you and will be required in order to pay you for your services. In those circumstances, the information will be shared with the Relevant Personnel (defined below) and our bank.

<b>The information we collect</b>	<b>How we collect the information</b>	<b>Why we collect the information</b>	<b>How we use and may share the information</b>
<b>Your name, contact details (i.e. address, home and mobile phone numbers and email address) and emergency contacts (i.e. name,</b>	From you	To enter into/perform the employment contract ('PTC')  Legitimate	PTC  For staff administration  Information shared with



relationship and home and mobile phone numbers) and any other employment records <input type="checkbox"/>		interest: to maintain employment records, to comply with legal obligations and for good employment practice ('GEP')	relevant managers, payroll, HR personnel and legal advisors ('Relevant Personnel')
Details of salary and benefits, bank/building society, National Insurance and tax information and your age <input type="checkbox"/>	From you	PTC including payment of salary and benefits, GEP	To ensure you receive the correct pay and benefits  Information shared with Relevant Personnel, any benefit providers, HMRC and our bank
Details of your qualifications and any professional status <input type="checkbox"/>	From you	PTC, GEP	To ensure you are qualified for the role that you perform  May be shared with Relevant Personnel and clients if required
Details of your spouse/partner and any dependants <input type="checkbox"/>	From you	PTC including employment-related benefits  To ensure that they can be contacted if for any legitimate reason they need to be	Information shared with Relevant Personnel, any benefit providers, HMRC and our bank
Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information <input type="checkbox"/>	From you and, where necessary, the Home Office	PTC, GEP	To carry out right to work checks  Information may be shared with Relevant Personnel and the Home Office

<p><b>A copy of your driving licence if required by your role</b> <input type="checkbox"/></p>	<p>From you or the DVLA portal</p>	<p>PTC, GEP and to comply with the terms of our insurance</p>	<p>PTC</p> <p>Information shared with Relevant Personnel, our insurer and any penalties/banning check provider</p>
<p><b>Details of your pension arrangements, and all information necessary to implement and administer them</b> <input type="checkbox"/></p>	<p>From you, from our pension administrators and (where necessary) from your own pension fund administrators</p>	<p>PTC including employment-related benefits, GEP</p>	<p>To administer your pension benefits and to comply with our auto-enrolment pension obligations</p> <p>Information shared with Relevant Personnel, our or your pension administrators and with HMRC</p>
<p><b>Information in your sickness and absence records (including sensitive personal information regarding your physical and/or mental health)</b> <input type="checkbox"/></p>	<p>From you, from your doctors, from medical and occupational health professionals we engage and from any insurance benefit administrators</p>	<p>PTC including employment-related benefits, GEP and to ensure safe working practices</p>	<p>PTC</p> <p>To comply with our legal obligations to you as your employer</p> <p>Information shared with your doctors, with medical and occupational health professionals we engage, Relevant Personnel and with any insurance benefit administrators*</p>
<p><b>Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs</b></p>	<p>From you</p>	<p>To comply with our legal obligations and for reasons of substantial public</p>	<p>To comply with our equal opportunities obligations and to follow our</p>



		interest (equality of opportunity or treatment)	policies*
<b>Information on grievances raised by or involving you and information on conduct issues involving you</b>	From you, from other employees and from consultants we may engage and any interested third parties	PTC, to comply with our legal obligations, GEP and to ensure safe working practices	PTC Information shared with Relevant Personnel and if appropriate any interested third parties
<b>Details of your appraisals and performance reviews and details of your performance management/improvement plans (if any)</b>	From you and from other employees	PTC, to comply with our legal obligations, GEP and to ensure safe working practices	PTC Information shared with Relevant Personnel
<b>Details of your time and attendance records</b>	From you and any time recording systems, e.g. time sheets	PTC Legitimate interest: to monitor and manage staff access to our systems and facilities and to record staff absences ('Access')	PTC Information shared with Relevant Personnel
<b>Information about your use of our IT, communication and other systems and your actions in and around the work place</b>	Websites, applications and other technical systems (including CCTV, phone, email and internet)	PTC, Access and to protect our networks and personal data of employees and customers/clients to investigate and ensure our policies, security and IT use, are adhered to for operational reasons and for statistical	To protect and carry out our legitimate interests (see adjacent column) Information shared with Relevant Personnel and any interested third parties

		analysis	
<b>Your use of public social media (only in very limited circumstances, to check specific risks for specific functions within our organisation) and any business related social media such as LinkedIn and Twitter</b>	From relevant websites and applications	PTC, to protect our external reputation, adherence to restrictions and to ensure compliance with sickness absence policies	To protect and carry out our legitimate interests (see adjacent column)  Information shared with Relevant Personnel
<b>Photographs</b>	From you	ID documents and marketing	PTC and to promote the company (e.g. websites, promotional material)
<b>Details in references about you that we give to others</b>	From your personnel records, our other employees	PTC, to comply with our legal and regulatory obligations and GEP	To provide you with the relevant reference  Information shared with Relevant Personnel and the recipient(s) of the reference

You are required (by law or under the terms of your contract of employment, or in order to enter into your contract of employment) to provide the categories of information marked '□' above to us to enable us to verify your right to work and suitability for the position, to pay you, to provide you with your contractual benefits and to administer statutory payments such as statutory sick pay (SSP). If you do not provide this information, we may not be able to employ you, make these payments or provide these benefits.

\* Further details on how we handle sensitive personal information are set out in our Data Protection Policy