

KGB Cleaning South West Ltd

General Data Protection Regulations 2018

Privacy Policy



This policy is provided with the intention to comply with your right to be informed under the General Data Protection Regulations 2018.

This policy is effective from the 25th May 2018 and will be reviewed on an annual basis.

We will hold and process the following information:

- Your personal contact details including your name, address, telephone numbers, and emails.
- Particulars of your employment including your job title, salary, benefits.
- Financial information including your bank details, National Insurance Number, tax statements, payslips.
- Particulars of your Right to Work in the UK.
- Particulars of your Enhanced DBS application.
- Particulars of your qualifications and skills including references, licences, certificates and training.
- Emergency contact information (Next of Kin).
- Particulars of your performance including tasks, attendance
- Sensitive information including protected characteristics under the Equality Act 2010 for Equal Opportunities Monitoring and Compliance
- IT usage information including email addresses, log-ins, passwords
- Particulars of processes e.g. disciplinary, grievance, performance management processes undertaken with yourself.
- Particulars related to any health assessments carried out with yourself.
- Particulars related to any individual risk assessments carried out with yourself.
- Copies of letters and communications between the Company and yourself.

We are the controller of this information and we are also the processor of this information. This data has been gathered with your consent and in the legitimate interest of assisting us in fulfilling the contractual requirements to supply hours and pay in the course of your employment. It will also be necessary for us to hold and process this data in the interests of your health, safety and welfare in work.

The Data Protection Officer responsible for the protection of your data is:

Ian Stangoe
Compliance Manager
07399612468 / 01235 832599
ian.stangoe@kgsouthwest.com
KGB Cleaning South West Ltd
Harwell Innovation Centre
Building 173
Curie Avenue
Harwell
Didcot
OX11 0QG

Your data will be used to assign you work, provide you with hours of work, pay you, monitor your performance, write to you with important documents, check your skills,

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qualifications and experience, appraise your performance and safeguard your health, safety and wellbeing in the workplace.

This is done on the basis of your consent and the legitimate interests to safeguard the health, safety and welfare of you and your colleagues, clients and third parties in the workplace. Your data is also processed in accordance with a contractual requirement between the Company and yourself. Failure to provide us with the data or to withdraw your consent may impact upon your recruitment, employment or tasks, duties and responsibilities with your role and/or assignment. You should discuss the further impact of this with your Line Manager.

The recipients of your data are the Company and we anticipate that we may need to share personal data with the HMRC, this being your name and National Insurance Number, Health Safety Executive, this being your name and employment details where there has been a reportable accident or investigation, Legal Advisers and professional advisers, this being your name and employment details, where the Company needs advice, Tribunals and Courts, this being your name, employment details and other personal data which is necessary for the determination of claims where litigation is commenced. It is not anticipated that there will be any other recipients nor any transfers of data to a third country. Accordingly, it is considered that safeguards for the transfer of data to a third country are not necessary. Should this change you will be notified.

Your employment data will be kept for the duration of your employment and for a further period thereafter of 6 years. This period has been set for the protection of our organisation throughout your employment and for a period thereafter in the event of any employment tribunal claims. If such a claim has been filed, the data will be retained for a period of 6 years following resolution of that claim and for 6 years following the resolution of any further claims. This period has been determined for the protection of the organisation in the event any professional negligence or breach of contract claims in the event we use representation to defend any claims.

Your financial data will be kept for the duration of your employment and for a further period thereafter of 6 years. This period has been set for the protection of our organisation throughout your employment and for a period thereafter in the event of any employment tribunal or breach of contract claims. If such a claim has been filed, the data will be retained for a period of 6 years following resolution of that claim and for 6 years following the resolution of any further claims. This period has been determined for the protection of the organisation under HMRC requirements and in the event any professional negligence or breach of contract claims in the event we use representation to defend any claims.

You have the right to be informed of fair processing information with a view to transparency of data. This statement is intended to fulfil that right

You have the right to access the information we hold. You should make such a request in writing to the Compliance Manager using the above contact information.

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You have the right to request the information we hold is rectified if it is inaccurate or incomplete. You should contact the Compliance Manager using the contact information provided within this policy and provide the Compliance Manager with the details of any inaccurate or incomplete data. The Company will then ensure that this is amended within one month. The Company may, in complex cases, extend this period to two months.

You have the right to erasure in the form of deletion or removal of personal data where there is no compelling reason for its continued processing. We have the right to refuse to erase data where this is necessary in the right of freedom of expression and information, to comply with a legal obligation for the performance of a public interest task, exercise of an official authority, for public health purposes in the public interest, for archiving purposes in the public interest, scientific research, historical research, statistical purposes or the exercise or defence of legal claims. You will be advised of the grounds of our refusal should any such request be refused.

You have the right to restrict our processing of your data and contest the accuracy of the data until the accuracy is verified. You have the right to restrict our processing of your data where you object to the processing, where it was necessary for the performance of a public interest task or purpose of legitimate interests and we are considering whether our organisation's legitimate grounds override your interests. You have the right to restrict our processing of your data when processing is unlawful and you oppose erasure and request restriction instead. You have the right to restrict our processing of your data where we no longer need the data and you require the data to establish, exercise or defend a legal claim. You will be advised when we lift a restriction on processing.

You have the right to data portability in that you may obtain and reuse your data for your own purposes across different services, from one IT environment to another in a safe and secure way, without hindrance to usability. The exact method will change from time to time. You will be informed of the mechanism that may be in place should you choose to exercise this right.

You have the right to object to the following:

- processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority, including profiling.
- direct marketing, including profiling.
- processing for purposes of scientific/historical research and statistics.
- The data collected is not anticipated to fall within the above categories.

Whilst there is no anticipated automated decision making relating to the data you provide, you have rights where there is automated decision making including profiling. We may only do this where it is necessary for the entry into or performance of a contract, authorised by EU or the UK law or based on your explicit consent. Whilst it is not anticipated that this will occur, where it does, we will give you information about this processing, introduce to you simple ways for you to request human intervention or challenge a decision, and carry out regular checks to ensure that our systems are working as intended.

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You have the right to withdraw your consent at any time.

You have the right to lodge a complaint with a supervisory authority such as the Information Commissioner's Office (ICO) or any other of our regulators or accreditors that may regulate or provide accreditations to us from time to time. We advise that you exhaust the Company's internal complaints/grievance procedure prior to referring the matter to any supervisory, regulatory or accrediting body. A copy of our complaints/grievance procedure is available in the Company Employee Handbook, Statement of Particulars and/or your Line Manager.

A handwritten signature in black ink, appearing to read 'John Nicholls'.

John Nicholls, Managing Director

25th May 2018