# Data Protection Policy

In running our business, we need to keep information about our employees. This includes information such as name, address, salary and the other matters highlighted in this policy. In doing this, we are required to comply with legal obligations concerning data protection.

## Who is responsible for Data Protection?

Although the A1 Group has overall responsibility for data protection, our HR Consultant is responsible for ensuring that we comply with our obligations regarding staff data. If you have any questions about this policy, or data protection in general, please speak to Human Resources.

## Why do we hold and process Personal Information?

We hold and process personal information relating to you, prospective employees and former employees for the following purposes:

- Recruitment and appointment
- Pay, benefits and other terms and conditions including pensions
- Work and performance management including appraisals
- Personnel administration and management including communicating with employees, managing absence and sick pay, promotions, monitoring and ensuring compliance with the A1 Group procedures (including Use of Email, Intranet, Internet and Voicemail Policy), disciplinary and similar processes, grievances, termination of employment, management planning and forecasting, equal opportunities monitoring, training and provision of references
- Complying with statutory, contractual and legal obligations including health and safety at work
- Security
- Any purpose set out in our data protection notification to the Information Commissioner (available from the HR Consultant)
- Any other purposes associated with recruitment and employment

## What is sensitive Personal Data?

Certain information is known as ‘sensitive personal data’. This includes personal information relating to racial or ethnic origin, physical and mental health, political opinions, religious beliefs, sexual orientation, age, trade union membership and criminal offences or alleged offences.

We hold and process the following types of sensitive personal data for the following purposes:

| Type of sensitive personal data | Purpose for which held and processed |
|---|---|
| Information relating to health | Recruitment, administering and managing your employment where it is or may be affected by your health. This includes obtaining, holding and using records of absence and sickness, medical and occupational health reports and certificates, making adjustments to your working arrangements, making decisions on your capacity for work and continuing employment, providing insurance benefits. |

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| Information relating to gender, race and ethnic origin | Ethnic monitoring, ensuring equal opportunity. Such information may also be apparent on photographs and CCTV which is operated for reasons of security. |
| Information relating to criminal offences and alleged offences | Recruitment and managing your employment in the light of any criminal offence or alleged offence, making decisions on continuing employment. |
| Other sensitive personal data given by you to us | The purposes for which you gave us the information. |

## Who gets to see your Personal Information?

Generally, unless employees permit it in any particular case, personal information will only be seen by other employees in connection with their duties. However, there are circumstances where such information may be disclosed outside the A1 Group.

We cannot identify these exhaustively but they include disclosure to or in connection with:

- Persons providing services to us or our employees if the information is reasonably necessary for the provision of those services
- Persons providing benefits (such as insurers and pension providers)
- Persons providing medical or occupational health advice or legal advice
- Our provision of services to clients and customers and prospective clients and customers where it is appropriate or they request it
- Statutory requests from government bodies
- Subsidiaries, holding companies and other members of our group of companies for the purposes of their or our businesses

We will hold your personal information securely and it will not be used or seen by others except for legitimate business purposes.

## Transfer of Information abroad

We may transfer personal information outside the European Economic area (EEA) to our subsidiaries, holding companies and other members of our group of companies. We will do this only if they agree to use the information for purposes for which we could have used it ourselves (and not other purposes) and hold the information in accordance with the principles of the Data Protection Act.

## What are your Rights?

The law gives you rights to see details of personal data held by us about you by making a subject access request.

In order to access personal data, you will be required to provide:

- the request in writing
- some indication of the likely location(s) of the data; and a fee of £10

In turn, A1 Group will:

- provide the data within 40 days of the request and provision of the fee

- make a proper search to retrieve the information and not disclose information on third parties that is written in a private rather than official capacity without the express permission of the person concerned, unless it is reasonable to do so without consent

## What are your Duties?

During your employment, you may have access to personal information about other employees or other individuals (including individual contacts at clients, customers, suppliers, and other organisations with which you may deal in the course of your duties). You must keep such information confidential and use it only for authorised purposes in connection with your duties. Any failure by you to do so may result in disciplinary action. If you are in any doubt about how to handle any personal data, you should contact your manager or the HR Consultant.

You must also keep us informed of any changes to your personal circumstances which we may need to know. This will include changes to your address or bank details or any other changes that may affect your employment.