

TOGIP™ HR Privacy Notice

Introduction

TOGIP™ is committed to conducting its business in accordance with all applicable Data Protection laws and regulations and in line with the highest standards of ethical conduct. This notice sets forth the expected behaviour of TOGIP™ in relation to the collection, use, retention, transfer, disclosure and destruction of any Personal Data belonging to a TOGIP™ employee.

Definitions

Employee - An individual who works part-time or full-time for TOGIP™ under a contract of employment, whether oral or written, express or implied, and has recognised rights and duties. Includes temporary employees and independent contractors.

Third Party - An external organisation with which TOGIP™ employs their services and is also authorised to, under the direct authority of TOGIP™, to process the Personal Data of TOGIP™ Employees.

Personal Data - Any information (including opinions and intentions) which relates to an identified or Identifiable Natural Person. Personal Data is subject to certain legal safeguards and other regulations, which impose restrictions on how organisations may process Personal Data.

Identifiable Natural Person - Any past, current or prospective TOGIP™ employee/customer.

Data Controller - An organisation that handles Personal Data and makes decisions about its use is known as a Data Controller. TOGIP™, as a Data Controller, is responsible for ensuring compliance with the Data Protection requirements outlined in this notice. Non-compliance may expose TOGIP™ to complaints, regulatory action, fines and/or reputational damage.

(This notice applies to all Processing of Personal Data in electronic form (including electronic mail and documents created with word processing software), third party databases such HROnline and Docusign or where it is held in manual files that are structured in a way that allows ready access to information about individuals.

TOGIP™ leadership is fully committed to ensuring continued and effective implementation of this notice and, expects all TOGIP™ Employees and Third Parties to share in this commitment. Any breach of this notice will be taken seriously and may result in disciplinary action or business sanction.

This notice has been approved by TOGIP™'s Chief Executive Officer, Ariana Pampoulides. party for the purpose of their or any other third party's direct marketing.

How your information will be used

1. As your employer, the Company needs to keep and process information about you for normal employment purposes. The information we hold and process will be used for our management and administrative use only. We will keep and use it to enable us to run the

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business and manage our relationship with you effectively, lawfully and appropriately, during the recruitment process, whilst you are working for us, at the time when your employment ends and after you have left. This includes using information to enable us to comply with the employment contract, to comply with any legal requirements, pursue the legitimate interests of the Company and protect our legal position in the event of legal proceedings. If you do not provide this data, we may be unable in some circumstances to comply with our obligations and we will tell you about the implications of that decision.

2. As a company providing outsourcing services to our clients, we may sometimes need to process your data to pursue our legitimate business interests, for example to prevent fraud, administrative purposes or reporting potential crimes. The nature of our legitimate interests are providing a range of outsourcing services to our clients. We will never process your data where these interests are overridden by your own interests.

3. Much of the information we hold will have been provided by you, but some may come from other internal sources, such as your manager, or in some cases, external sources, such as referees, recruitment agencies, HMRC.

What sort of information we hold

4. The sort of information we hold includes:

- your application form and references;
- your contract of employment and any amendments to it;
- correspondence with or about you, for example letters to you about a pay rise or, at your request, a letter to your mortgage company confirming your salary;
- information needed for payroll, benefits and expenses purposes;
- contact and emergency contact details;
- records of holiday, sickness and other absence;
- proof of address e.g. utility bill, identification e.g. passport
- information needed for equal opportunities monitoring policy;
- and records relating to your career history, such as training records, appraisals, other performance measures and, where appropriate, disciplinary and grievance records.

5. You will, of course, inevitably be referred to in many company documents and records that are produced by you and your colleagues in the course of carrying out your duties and the business of the company. You should refer to the Data Protection Policy which is available on our TOGIP™ Wiki.

6. Where necessary, we may keep information relating to your health, which could include reasons for absence and GP reports and notes. This information will be used in order to comply with our health and safety and occupational health obligations – to consider how your health affects your ability to do your job and whether any adjustments to your job might be appropriate. We will also need this data to administer and manage statutory and company sick pay and health insurance.

7. Where we process special categories of information relating to your racial or ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, biometric data

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or sexual orientation, we will always obtain your explicit consent to those activities unless this is not required by law or the information is required to protect your health in an emergency. Where we are processing data based on your consent, you have the right to withdraw that consent at any time.

8. In addition, we monitor computer, internal and external email and telephone/mobile telephone use, as detailed in our company handbook.

Who we disclose your information to

9. Other than as mentioned below, we will only disclose information about you to third parties if we are legally obliged to do so or where we need to comply with our contractual duties to you, for instance we may need to pass on certain information to our payroll department, pension or health insurance schemes.

10. We may transfer information about you to other group companies for purposes connected with your employment or the management of the company's business.

11. In limited and necessary circumstances, your information may be transferred outside of the EEA or to an international organisation to comply with our legal or contractual requirements. We have in place safeguards to ensure the security of your data.

How long we store your information

12. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes as stipulated by the ICO. For example, data relating to PAYE, maternity pay or SMP is kept for 3 years as that is how long the HMRC may be interested in terms of conducting reviews.

13. Your Personal data will be held for a maximum of six years, after which it will be destroyed. If in the future we intend to process your personal data for a purpose other than that which it was collected we will provide you with information on that purpose and any other relevant information.

Your rights regarding your information

14. Under the General Data Protection Regulation (GDPR) and The Data Protection Act 2018 (DPA) you have a number of rights with regard to your personal data. You have the right to request from us access to and rectification or erasure of your personal data, the right to restrict processing, object to processing as well as in certain circumstances the right to data portability.

15. If you have provided consent for the processing of your data you have the right (in certain circumstances) to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn.

16. You have the right to lodge a complaint to the Information Commissioners' Office if you

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believe that we have not complied with the requirements of the GDPR or DPA 18 with regard to your personal data.

Identity and contact details of controller and data protection officer

TOGIP™ is the controller [and processor] of data for the purposes of the DPA 18 and GDPR.

If you have any concerns as to how your data is processed, you can contact:

Data Protection Officer at support@togiprecruitment.com

or you can write to us using the address of:

Human Resources, TOGIP™
120 - 122 Braymere Road
Hampton,
Peterborough, PE7 8NB