



WESTON PARK

WESTON PARK ENTERPRISES LIMITED

PERSONNEL PRIVACY NOTICE

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1. Purpose of this Personnel Privacy Notice

Weston Park Enterprises Ltd is a limited company registered in England and Wales and is the ‘data controller’ of your personal data. This means that we are responsible for deciding how we hold and use personal information about you.

Weston Park is registered with the UK Information Commissioners Office, registration number 28196202.

This notice applies to any person employed/engaged in a relationship with Weston Park Enterprises Ltd and to include, as an example, current and former employees, volunteers, workers and contractors. This notice does not form part of any contract of employment or other contract to provide services.

It is important that you read and retain this notice, together with any other privacy notice we may provide when we are collecting or processing personal information about you. This is to ensure that you are aware of how and why we are using such information and what your rights are under the data protection legislation.

We reserve the right to update this Personnel Privacy Notice at any time, and we will provide you with relevant information in respect of any changes made. We use dashboards to assist with delivering privacy information.

This Personnel Privacy notice describes how we collect and use personal information about you during and after your relationship with us, in accordance with the General Data Protection Regulation (GDPR) and applies to all personnel as per the “definitions” below.

2. Definitions:

DEFINITION	MEANING
Company	Weston Park Enterprises Limited
Consent	Agreement which must be given freely
Contact Details	Email either: DataProtectionOfficer@weston-park.com PrivacyManager@weston-park.com Or you can write to: Weston Park Enterprises Ltd Weston-under-Lizard

DEFINITION	MEANING
	Nr Shifnal, Shropshire, TF11 8LE
Data Controller	The person or organisation that determines when, why and how to process Personal Data. It is responsible for establishing practices and policies in line with GDPR. We are the Data Controller of all Personal Data relating to our Company Personnel and Personal Data used in our business for our own commercial purposes, in this instance the Company
Data Protection Officer (DPO)	The person required to be appointed in specific circumstances under GDPR legislation. Where a mandatory DPO has not been appointed, this term means a Privacy Manager or other voluntary appointment of a DPO with responsibility for data protection compliance. The CEO is the Company's appointed DPO
General Data Protection Regulation (GDPR)	The General Data Protection Regulation ((EU) 2016/679). Personal Data is subject to the legal safeguards specified in the GDPR
Personnel	The definition of personnel means any person employed/engaged in a relationship with Weston Park Enterprises Ltd. All employees (current, former & potential), workers, volunteers, contractors, agency workers, consultants, students, apprentices, work experience, directors, trustees, members and others
Privacy Manager	The Personnel Officer
Third Party Service Provider	Contractors and designated agents such as pension provider/HMRC as an example

3. Data protection principles

We will comply with data protection law. This states that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
- Relevant to the purposes we have told you about and limited only to those purposes
- Accurate and kept up to date
- Kept only as long as necessary for the purposes we have told you about
- Kept securely

4. What is personal information?

Personal data, or personal information, can cover a wide range of topics, but in general, it includes any information you tell us about yourself and your preferences. Personal information can include things that can allow someone to identify you either directly through your name or national insurance number, or indirectly, through your address, date of birth, phone number, bank account details or email address.

Some of your personal information is treated as being sensitive under GDPR and therefore needs additional controls and a higher level of protection; this includes information regarding your medical history, criminal convictions, trade union membership or racial/ethnic origin. For the purposes of this document this information is known as "special categories of personal data". We will only ever use sensitive personal data where processing is necessary for the purposes of carrying out the Company's obligations under Government legislation. We will request individual consent for this type of data.

It does not include data where the identity has been removed (anonymous data).

5. What will we collect?

We will collect, store, and use the following categories of personal data/information about you:

CATEGORY	INFORMATION PROCESSED
Contact Data	Address, email, contact telephone numbers

CATEGORY	INFORMATION PROCESSED
Disciplinary and Grievance Data	Information relating to any disciplinary investigations, hearings or appeals Information relating to grievances raised
Emergency Contact Data	Name, relationship to yourself, telephone numbers for work and home
Employment Data	Start date (and if different, the date of your continued employment) Job title Location of work Working hours Bank account details Payroll records and tax status information Salary All types of leave to include holiday, lieu, compassionate, sick Pension and benefits information Leaving date Exit interview
Equipment, Systems and Processes Data	Log in data Information about your use of our information and communication systems Network and information security Software use
Identity Data	Title, first name, middle name and surname Username or similar identifier Date of birth National Insurance number Photographic images e.g. ID documents such as passport/ driving licence Photographic images taken for marketing and/or social events Moving video images such as CCTV
Recruitment Data	Application forms/CV's and covering letters 'Right to work' information Professional qualifications Providing and/or requesting references

CATEGORY	INFORMATION PROCESSED
Training, Development and Performance Data	Training records Personal development records Professional memberships Performance/appraisal information
We may also collect, store and use the following, more sensitive personal information, known as "Special Categories Data":	
Special Categories Data	Trade union membership Health including medical conditions Criminal convictions Ethnic origin

6. How is the personal information collected?

We collect personal information through the application and recruitment process, either directly from personnel, candidates, employment agency or background check provider. We may sometimes collect additional information from third parties including former employers.

We will collect additional personal data in the course of work-related activities throughout the period of our relationship.

7. What will we use the personal information for?

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- When we need to perform the contract we have entered into with you
- When we need to comply with a legal or regulatory obligation
- When it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests

We may also use your personal information in the following situations, which are likely to be rare:

- When we need to protect your interests (or someone else's interests)
- When it is needed in the public interest (or for official purposes)

We have set out below, in a table format, a description of all the ways we will use your personal data, and which of the lawful bases we rely on to do so. We have also identified what our legitimate interests (purpose/activity) are where appropriate.

We may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data. Please contact the Privacy Manager if you need more details about the lawful basis we are relying on to process your personal data.

	PURPOSE/ACTIVITY	PERSONAL DATA USED	LAWFUL BASIS FOR PROCESSING
1.	Making a decision about your recruitment or appointment	Identity data Recruitment data Special categories data	Performance of a contract with you To comply with our legal and regulatory obligations For our legitimate interests (to ensure sound recruitment practices and that the Company has the necessary resources and skill set to achieve its business objectives)
2.	Determining the terms on which you work for us	Contact data Employment data Identity data	Performance of a contract with you To comply with our legal and regulatory obligations For our legitimate interests (to ensure sound recruitment practices and that the Company has the necessary resources and

	PURPOSE/ACTIVITY	PERSONAL DATA USED	LAWFUL BASIS FOR PROCESSING
			skill set to achieve its business objectives)
3.	Checking you are legally entitled to work in the UK	Contact data Identity data	Performance of a contract with you To comply with our legal and regulatory obligations
4.	Paying you and, if you are an employee or deemed employee for tax purposes, deducting tax and National Insurance contributions (NIC's)	Contact data Employment data Identity data	Performance of a contract with you To comply with our legal and regulatory obligations
5.	Providing benefits: Estate Pass Death in Service and other benefits	Contact data Employment data Identity data	Performance of a contract with you
6.	Enrolling you in a pension arrangement in accordance with our statutory automatic enrolment duties	Contact data Employment data Identity data	Performance of a contract with you To comply with our legal and regulatory obligations
7.	Administering the contract we have entered into with you	Contact data Employment data Identity data	Performance of a contract with you To comply with our legal and regulatory obligations

	PURPOSE/ACTIVITY	PERSONAL DATA USED	LAWFUL BASIS FOR PROCESSING
8.	Conducting and manage performance reviews	Contact data Employment data Identity data Training, development and performance data	Performance of a contract with you To comply with our legal and regulatory obligations For our legitimate interests (to ensure the Company has the necessary resources and skill set to achieve its business objectives)
9.	Making decisions about salary reviews and compensation	Contact data Employment data Identity data Training, development and performance data	Performance of a contract with you Necessary for our legitimate interests (to ensure employees are remunerated fairly and appropriately)
10.	Assessing qualifications for a particular role or task	Contact data Employment data Identity data Training, development and performance data	Performance of a contract with you To comply with our legal and regulatory obligations For our legitimate interests (to ensure the Company has the necessary resources and skill set to achieve its business objectives)

	PURPOSE/ACTIVITY	PERSONAL DATA USED	LAWFUL BASIS FOR PROCESSING
11.	Gathering evidence for possible grievance or disciplinary hearings	Contact data Disciplinary and grievance data Employment data Equipment, systems and processes data Identity data Training, development and performance data	To comply with our legal and regulatory obligations Necessary for our legitimate interests (to ensure that such procedures are dealt with effectively and efficiently) Performance of a contract with you
12.	Making decisions about your continued employment or engagement	Contact data Disciplinary and grievance data Employment data Equipment, systems and processes data Identity data Training, development and performance data	Performance of a contract with you To comply with our legal and regulatory obligations For our legitimate interests (to ensure the Company has the necessary resources and skill set to achieve its business objectives)
13.	Making arrangements for the termination of our working relationship	Contact data Disciplinary and grievance data Employment data	Performance of a contract with you To comply with our legal and regulatory obligations

	PURPOSE/ACTIVITY	PERSONAL DATA USED	LAWFUL BASIS FOR PROCESSING
		Equipment, systems and processes data Identity data Training, development and performance data	
14.	Education, training and development requirements	Contact data Employment data Identity data Training, development and performance data	Performance of a contract with you To comply with our legal and regulatory obligations For our legitimate interests (to ensure the Company has the necessary resources and skill set to achieve its business objectives)
15.	Dealing with legal disputes involving you, or other employees, workers, contractors, including accidents at work	Contact data Disciplinary and grievance data Employment data Identity data Special categories data	Performance of a contract with you To comply with our legal and regulatory obligations Necessary for our legitimate interests (to ensure that legal disputes are dealt with effectively and efficiently)
16.	Ascertaining your fitness to work	Contact data	Performance of a contract with you

	PURPOSE/ACTIVITY	PERSONAL DATA USED	LAWFUL BASIS FOR PROCESSING
		<p>Employment data</p> <p>Identity data</p> <p>Special categories data</p>	<p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests (to ensure the Company has the necessary resources and skill set to achieve its business objectives)</p>
17.	Managing sickness absence	<p>Contact data</p> <p>Emergency contact data</p> <p>Employment data</p> <p>Identity data</p> <p>Special categories data</p>	<p>Performance of a contract with you</p> <p>To comply with our legal and regulatory obligations</p> <p>Necessary for our legitimate interests (to ensure the safety and well-being of our employees)</p>
18.	Complying with health and safety obligations	<p>Contact data</p> <p>Emergency contact data</p> <p>Employment data</p> <p>Identity data</p> <p>Special categories data</p>	<p>Performance of a contract with you</p> <p>To comply with our legal and regulatory obligations</p> <p>Necessary for our legitimate interests (to ensure the safety and well-being of our employees)</p>

	PURPOSE/ACTIVITY	PERSONAL DATA USED	LAWFUL BASIS FOR PROCESSING
19.	To prevent fraud	Contact data Disciplinary and grievance data Equipment, systems and processes data Identity data Training, development and performance data	Performance of a contract with you To comply with our legal and regulatory obligations Necessary for our legitimate interests (to safeguard the Company from loss – financial or otherwise)
20.	To monitor your use of our information and communication systems to ensure compliance with our IT Policies	Contact data Equipment, systems and processes data Identity data Training, development and performance data	Performance of a contract with you To comply with our legal and regulatory obligations Necessary for our legitimate interests (to ensure the security of the Company's information assets)
21.	Network and information security, including preventing unauthorised access to computer/ electronic communications systems and preventing malicious software	Contact data Equipment, systems and processes data Identity data Training, development and performance data	Performance of a contract with you To comply with our legal and regulatory obligations Necessary for our legitimate interests (to ensure the security of the Company's information assets)

	PURPOSE/ACTIVITY	PERSONAL DATA USED	LAWFUL BASIS FOR PROCESSING
22.	To conduct data analytics studies to review and better understand employee retention and attrition rates	Contact data Employment data Identity data Recruitment data Special categories data Training, development and performance data	Performance of a contract with you To comply with our legal and regulatory obligations For our legitimate interests (to ensure the Company has the necessary resources and skill set to achieve its business objectives)
23.	Equal opportunities monitoring	Contact data Employment data Identity data Special categories data	Performance of a contract with you To comply with our legal and regulatory obligations Necessary for our legitimate interests (to maintain status as an equal opportunities employer)

8. Failure to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our personnel).

9. Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

10. Our obligations as a Data Controller

We will use your particularly sensitive personal information (Special Categories Data) in the following ways:

- We will use information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws
- We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits including statutory maternity pay, statutory sick pay, pensions and permanent health insurance
- We will use information in accordance with the Equality Act 2010 to ensure meaningful equal opportunity monitoring and reporting

11. Do we need your consent?

We do not need your consent to use your personal information in accordance with our written policy or to carry out our legal obligations or to exercise specific rights in the field of employment law. In certain circumstances, we may approach you for your written consent to allow us to process other data. If we do, we will provide you with details of the information required and the reason for the request. This is to enable you to carefully consider whether you wish to consent.

12. Special Categories

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

- With your explicit written consent

- When we need to carry out our legal obligations or exercise rights in connection with employment
- When it is needed in the public interest, such as for equal opportunities monitoring or in relation to our pension scheme

Less commonly, we may process this type of information when it is needed in relation to legal claims or when it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or when you have already made the information public. We may also process such information about members or former members in the course of legitimate business activities with the appropriate safeguard.

When appropriate, we may collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of your relationship with us.

You should be aware that it is not a condition of your contract with us to consent to any request from us in respect of special categories data.

13. Data sharing and Security

We may have to share your data with third parties, including third-party service providers and other entities.

We require third parties to respect the security of your data and to treat it in accordance with the law.

If we do, you can expect a similar degree of protection in respect of your personal information.

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

"Third parties" includes third-party service providers (including contractors and designated agents)

As an example, the following activities are carried out by third-party service providers. This list is not exhaustive.

Third party service provider	Activity
Company Pension provider	Company Pension administration
Government Pension provider	Government Pension administration

Third party service provider	Activity
Advisers	Advice for employees
HM Revenue & other authorities	Returns, to comply with law

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. In this situation we will, so far as possible, share anonymised data with the other parties before the transaction completes. Once the transaction is completed, we will share your personal data with the other parties if and to the extent required under the terms of the transaction.

We may also need to share your personal information with a regulator or to otherwise comply with the law. This may include making returns to HMRC as an example.

14. Transferring information outside the EU

We will not transfer personal information we collect about you to any country outside the EU.

15. Data security

Measures are in place to protect the security of your information. Details of these measures are available upon request in our Data Protection Policy and our Information Security Policy.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties on a business need to know basis. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures can be found in our Data Protection Policy which can be obtained from the Privacy Manager.

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

16. Data retention

We will retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

We will retain your personal information based on the following criteria:

- For as long as we have reasonable business needs, such as managing our relationship with you and managing our operations to allow us to respond to any questions or queries you may have
- For as long as we provide goods and/or services to you and then for as long as someone could bring a claim against us
- Retention periods in line with legal and regulatory requirements

Details of retention periods can be found in the Company's Data Protection Policy or available from the Privacy Manager.

To determine the appropriate retention period for personal data, we consider:

- the amount, nature, and sensitivity of the personal data
- the potential risk of harm from unauthorised use or disclosure of your personal data
- the purposes for which we process your personal data and whether we can achieve those purposes through other means
- the applicable legal requirements

In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case we may use such information without further notice to you.

17. Personal data access rights

It is important that the personal information we hold about you is accurate and current. Remember, it is your duty and obligation to keep us informed if your personal information changes during your relationship with us. Any amendments can be emailed to our Privacy Manager.

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected

- **Request deletion** of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below)
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes, where applicable
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it
- **Request the secure transfer** of your personal information to another party

If you want to review, verify, correct or request deletion of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Privacy Manager, see definitions table for further information.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Privacy Manager. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another lawful basis for doing so.

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.



WESTON PARK

PERSONNEL PRIVACY NOTICE DECLARATION

I have read this Personnel Privacy Notice and understand how and why my personal information/
data is used and what my rights are under GDPR.

Name:	
Signature:	
Date:	