



# Creanova Employee Privacy Notice

## Purpose

This Fair Processing Notice, also known as a Privacy Notice, describes how the Company collects and uses personal information relating to all its employees, workers and contractors including agency staff. If you are an external candidate and seek further information, please speak with your recruiting manager.

## Key terms

- **Data controller** - A controller determines the purposes and means of processing personal data.
- **Data processor** - A processor is responsible for processing personal data on behalf of a controller.
- **Data subject** - A person
- **Personal data** - The Data Protection legislation applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier. For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.
- **Special categories personal data** - The Data Protection legislation refers to sensitive personal data as 'special categories of personal data'. The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.
- **Processing** - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- **Third party** - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct



authority of the controller or processor, are authorised to process personal data.

## Our privacy policy

It is the Company's policy to:

- Process your personal information fairly with a legal basis for processing your data;
- Tell you (either directly or in our policies) about how we will use your personal information;
- Only collect personal information from you when we need it for legitimate interests and fulfilment of legal obligations;
- Ensure that your personal information is adequate, relevant and not excessive for the purpose for which we collect it;
- Not keep your personal information for longer than we need to;
- Keep your personal information secure, and limit the people who can access it;
- Ensure that you know how to access your personal information and exercise your rights in relation to it, including being able to keep it accurate and up-to-date; and
- Ensure that any third parties we share your personal information with take appropriate steps to protect it.

## What personal information does the Company collect from and about you?

We collect and use different types of personal information about you, depending on your circumstances, your role and the law, which may include:

Type of information	Examples Please note that the examples are illustrative and non-exhaustive.
Information about you:	name, address, date of birth, marital status, nationality, race, gender, religion, and preferred language, details of any disabilities, work restrictions and/or required accommodations.
Information to contact you at work or home:	name, address, telephone, and e-mail addresses.



Information about who to contact in a case of emergency (yours or ours):	name, address, telephone, e-mail addresses and their relationship to you.
Information to identify you:	Photographs, passport and/or driving license details, electronic signatures.
Information about your suitability to work for us and/or a relevant third party:	References, interview notes, work visas ID information such as passport details and driving licence information, records/results of pre-employment checks, including criminal record checks, credit and fraud checks.
Information about your skills and experience:	CVs, resumes and/or application forms, references, records of qualifications, skills, training and other compliance requirements.
Information about your terms of employment with us:	Letters of offer and acceptance of employment, your employment contract.
Information that we need to pay you:	Bank account details, national insurance or social security numbers (where applicable).
Information that we need to provide you with benefits and other entitlements:	Length of service information, health information, leave requests.
Information to allow you to access our buildings and systems:	Employee identification number (UIN), computer or facilities access and authentication information, identification codes, passwords, answers to security questions, photographs, video images.
Information relating to your performance at work:	Performance ratings, leadership ratings, targets, objectives, records of performance reviews, records and/or notes of 1 to 1s and other meetings, personal development plans, personal improvement plans, correspondence and reports.
Information relating to discipline, grievance and other employment related processes:	Interview/meeting notes or recordings, correspondence.



Information relating to your work travel and expenses.	Bank account details, passport, driving licence, vehicle registration and insurance details.
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## Why do we need to collect and use your personal information?

We need to collect and use your personal information for a number of purposes. These may include:

Purposes for which we need your personal information:	Examples Please note that the examples are illustrative and non-exhaustive.
Recruitment.	<ul style="list-style-type: none"><li>● To assess your suitability to work for us;</li><li>● To perform requisition and applicant management activities;</li><li>● To perform precision matching to job vacancies;</li><li>● To conduct screening, assessments and interviews;</li><li>● To maintain a library of correspondence;</li><li>● To make offers and provide contracts of employment;</li><li>● To conduct pre-employment checks, including determining your legal right to work and carrying out criminal record and credit checks where needed</li></ul>
Human Resources (“HR”), finance and other business administration purposes.	<ul style="list-style-type: none"><li>● Staffing, including resource planning, recruitment, termination, and succession planning;</li><li>● Budgetary and financial planning and administration;</li><li>● Organisational planning and development and workforce management;</li><li>● Compensation, payroll, and benefit planning and administration, including salary, tax withholding, tax equalization, awards, insurance and pensions;</li><li>● Workforce development, education, training and certification;</li><li>● Performance management;</li><li>● Problem resolution, including carrying out internal reviews, grievances, investigations, audits;</li><li>● Business travel and expense management;</li><li>● To conduct business reporting and analytics;</li></ul>



	<ul style="list-style-type: none"><li>● Administration of flexible work arrangements;</li><li>● Administration of employee enrolment and participation in activities and programmes offered to eligible employees, including matching donations to non-profit organizations, political action committee contributions, and wellness activities;</li><li>● Work-related injury and illness, including the management of employee Health &amp; Safety, and disabilities;</li><li>● To provide HR support and case management;</li><li>● To communicate with you and to facilitate communication between you and other people;</li><li>● Compliance and compliance reporting, including conflict of interest and gifts and hospitality reporting;</li><li>● Risk management;</li><li>● Project Management; and Training and quality purposes.</li></ul>
Security purposes	<ul style="list-style-type: none"><li>● Physical access control;</li><li>● Authorizing, granting, administering, monitoring and terminating access to or use of our or third party facilities, records, property and infrastructure including communications services such as business telephones and email/internet use;</li><li>● CCTV; and</li><li>● Prevention and detection of crime.</li></ul>
Information Technology (“IT”) administration purposes:	<ul style="list-style-type: none"><li>● IT Systems access control and use monitoring;</li><li>● IT fault reporting, management and resolution;</li><li>● Systems administration, support, development, management and maintenance.</li></ul>
Legal purposes	<ul style="list-style-type: none"><li>● To comply with our legal obligations.</li></ul>

## How do we protect your personal information?

We have security arrangements in place to guard against unauthorised access, improper use, alteration, destruction or accidental loss of your personal information. You are required to help with this by ensuring that your own personal information and that of your colleagues and third parties are kept secure. You should not share your (or anybody else’s) personal information unless there is a genuine business reason for doing so.



We take appropriate organisational and technical security measures and have rules and procedures in place to ensure that any personal information we hold on computer systems is not accessed by anyone it shouldn't be. Information about the IT Security standards we use to protect your personal information can be found in the Company IT Policy.

When we use third party organisations to process information on our behalf we ask them to demonstrate their compliance with our security requirements, and any instructions we may give them and their compliance with relevant data protection legislation throughout the time they work for the Company. These organisations take their instructions from us and their obligations with regard to what information they process and what they can do with it are agreed in the contracts we have with them.

## **How can you request access to the personal information the Company holds about you?**

Creanova Ltd is the controller and processor of data for the purposes of the Data Protection Act 2018 and the requirements under the EU General Data Processing Regulations (GDPR).

If you have any questions about the personal information that we hold about you, we suggest that you speak to your line manager or in the first instance. Alternatively, you can contact:

**Ed Evans, Data Controller at [ed.evans@creanova.co.uk](mailto:ed.evans@creanova.co.uk)**

or you can write using the address of Creanova, 8 Sabrina House, Sabrina Court, Shrewsbury SY3 7BF

## **Changes to our privacy policy**

Any changes we may make to our privacy policy in the future will be posted on the Company Notice Board and/ or where appropriate, notified to you by email.

**Last Updated: 30 April 2018**