



## PRIVACY NOTICE

### 1. Purpose

- 1.1 Z-Tech is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR).
- 1.2 This policy applies to all employees, officers, consultants, contractors, casual workers and agency workers.
- 1.3 This policy does not form part of an employee's contract of employment and may be amended by the Company at any time.
- 1.4 Z-Tech is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under the data protection legislation to notify you of the information contained in this privacy notice.
- 1.5 It is important that you read this notice, together with the Data Protection Policy and Retention Policy.

### 2. Data Protection Principles

- 2.1 Anyone processing personal data must comply with the data protection principles. These provide that personal data must be:
  - Processed fairly, lawfully and in a transparent manner ('Lawfulness, fairness and transparency')
  - Processed for specified, explicit and legitimate purposes ('Purpose limitation')
  - Adequate, relevant and not excessive for the purpose ('Data minimisation')
  - Accurate and, where necessary, kept up to date ('Accuracy')
  - Not kept longer than necessary for the purpose ('Storage limitation')
  - Processed in line with data subjects' rights ('Data subject's rights and requests')
  - Processed in a manner that ensures appropriate security ('Integrity and confidentiality')
  - Not transferred to people or organisations situated in countries without adequate protection ('Transfer limitation').
- 2.2 The Company must also be able to demonstrate compliance with the data protection principles ('Accountability').

### 3. The kind of information we hold about you

- 3.1 Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).
- 3.2 We will collect, store, and use the following categories of personal information about you:
  - Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses
  - Date of birth



- Gender
- Marital status and dependents
- Next of kin and emergency contact information
- National Insurance number
- Bank account details, payroll records and tax status information
- Salary, level, annual leave, pension and benefits information
- Start date
- Location of employment or workplace
- Copy of driving license
- Copy of passport
- Copy of visa
- Recruitment information (including copies of right to work documentation, reference and other information included in CV or cover letter or as part of the application process).
- Employment records (including job titles, work history, working hours, training records and professional memberships).
- Compensation history
- Performance information (including one to ones, performance management documents and file notes)
- Disciplinary and grievance information
- CCTV footage and other information obtained through electronic means
- Information about your use of our information and communication systems
- Photographs

3.3 We may also collect, store, and use the following special categories of more sensitive personal information about you:

- Information about your health, including any medical condition, health and sickness records
- Information about criminal convictions and offences

#### **4. How your personal information is collected**

4.1 We collect personal information through the applicant and recruitment process, either directly from candidates or sometimes from an employment agency.

4.2 We may collect additional information from third parties including former employers, credit reference agencies or other background check agencies.

4.3 We will collect additional personal information in the course of job-related activities throughout the period of you working for us.

#### **5. How your personal information will be used**

5.1 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:

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

5.2 We may also use your personal information in the following situations:

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

## **6. The situations in which we will use your personal information**

6.1 The situations in which we will process your personal information are listed below:

- Making a decision about your recruitment or appointment
- Determining the terms on which you work for us
- Checking you are legally entitled to work in the UK
- Checking you have a valid driving licence where there is a need to drive a company vehicle
- Paying you and, if you are an employee, deducting tax and national insurance contributions
- Administrating the childcare voucher scheme
- Liaising with your pension provider
- Administering the contract we have entered into with you
- Business management and planning, including accounting and auditing
- Conducted personal reviews, management performance and determining performance requirements
- Making decisions about salary reviews and compensation
- Assessing qualifications for a particular job or task, including decisions about promotions
- Gathering evidence for possible grievance or disciplinary hearings
- Making decisions about your continued employment or engagement
- Making arrangements for the termination of our working relationship
- Education, training and development requirements
- Dealing with legal disputed including accidents at work
- Ascertaining your fitness to work
- Managing your fitness to work
- Managing sickness absence
- Complying with health and safety obligations
- To prevent fraud
- To monitor your use of our information and communication systems to ensure compliance with our IT Policies
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution

## **7. If you fail to provide personal information**



7.1 If you do not provide certain information when request, 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 workers).

## **8. Changes of purpose**

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

8.2 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.

8.3 Please note that we may process your personal information without your knowledge or consent, in compliance with the rules set out in this notice, where this is required or permitted by law.

## **9. How your particularly sensitive personal data will be used**

9.1 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.

9.2 We may process special categories of personal information in the following circumstances:

- In limited circumstances, with your explicit written consent
- Where we need to carry out our legal obligations and in line with our date protection privacy standard
- Where it is needed in the public interest, such as for equal opportunities monitoring, and in line with our data protection privacy standard
- Where is it needed to assess your working capacity on health ground, subject to appropriate confidentiality safeguards

9.3 Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

9.4 We will use your particularly sensitive personal information 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

## **10. Do we need your consent?**

10.1 We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law.



10.2 In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

## **11. Criminal convictions**

11.1 We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our data protection privacy standard.

11.2 Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

11.3 We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so.

11.4 Where appropriate, we will 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 you working for us.

11.5 We will use information about criminal convictions and offences to decide what level of data access an employee should have in their role

11.6 We are allowed to use your personal information in this way to protect the rights of Z-Tech, its employees and all its trading partners.

## **12. Data sharing**

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

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

12.3 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.

12.5 We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

12.6 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.



### **13. Data retention**

- 13.1 We will only 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.
- 13.2 Details of retention periods for different aspects of your personal information are available in our retention policy which is available on Sharepoint or from the Head of HR.
- 13.3 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, and the applicable legal requirements.
- 13.4 In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee, officer, consultant, casual worker or agency worker for the Company, we will retain and securely destroy your personal information in accordance with our data retention policy.

### **14. Your duty to inform us of changes**

- 14.1 It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

### **15. Your rights**



- 15.1 You have the right to:
- Withdraw your consent at any time;
  - Request access to any personal data held by us about you (although we also have the right under the Data Protection Legislation, in certain circumstances, to determine the form in which such data shall be provided to you and to limit or withhold certain information);
  - Request that your personal data be deleted if it is no longer necessary in respect of the purposes for which it was collected;
  - Data portability (in limited circumstances);
  - Request restriction of the processing of your personal data in specific circumstances;
  - Prevent the processing of your data for direct-marketing purposes;
  - Ask to have inaccurate data held about you amended;
  - Prevent processing that is likely to cause unwarranted, substantial damage or distress to you or anyone else;
  - Be notified of a personal data breach which is likely to result in a high risk to your rights and freedoms;
  - Make a complaint to the Information Commissioner's Office; and
  - Object to any decision that significantly affects you where such decision is taken solely by a computer or other automated process.



15.2 Requests for access, correction, restriction or erasure and/or objections to processing should be in writing and addressed to Jeremy Bull at [Jeremy.bull@z-tech.co.uk](mailto:Jeremy.bull@z-tech.co.uk). Employees who receive a written request should forward it to Jeremy Bull immediately. If the Company cannot comply with the request, you will be informed, and the reasons will be documented. A log of all requests will be maintained.

**16. Right to withdraw consent**

16.1 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 Jeremy Bull at [Jeremy.bull@z-tech.co.uk](mailto:Jeremy.bull@z-tech.co.uk). 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 legitimate basis for doing so in law.

Issue	Changes made	Date	Reviewed by	Signature
1	Published	01/10/2019	Head of HR	
2	Reviewed	05/03/2020	Head of HR	
3	Reviewed	01/07/2021	HR Director	