# **UK Data Privacy Notice**

The Premia group takes data privacy very seriously, and this Data Privacy Notice is designed to help you understand how we use your personal information. This Data Privacy Notice applies to prospective, current or past employees; contractors; consultants; workers; officers; volunteers; interns; agency workers and apprentices employed or engaged.

**The purpose of this Privacy Notice**

## **Identity**

We are Premia UK Services Company Ltd (Premia) .

**This Privacy Notice**

This Privacy Notice applies across our business. It is designed to help you understand how, and why, we use your personal information.

In addition to the information in this Privacy Notice, from time to time you may be given further information about the uses of your personal information.

This Notice does not form part of any contract of employment, or other contract to provide services, that we may enter into with you from time to time.

## **Updating this Privacy Notice**

This Privacy Notice will be made available on our website at [www.premia](http://www.premia)holdings.com and on the HR section of Sharepoint, and may be updated from time to time at our discretion, and as the law governing data protection and privacy evolve.

**What is personal information?**

Personal information is information that relates to you, or allows us to identify you. It may include your name, but it may also be other information such as your date of birth, nationality and gender which, when combined, identify you. This information may be collected in a variety of ways, including electronically, in paper form, by telephone or in person.

There are different types of personal information. The most important types for you to know about are:

* Special categories of personal information – these categories of personal information often have additional protection under data protection laws around the world. These categories include information about your health, racial or ethnic origin, political opinions, religious or philosophical beliefs and trade union membership, your genetic data and biometric data, and information concerning your sexual orientation.
* Criminal convictions information – this is information relating to your criminal convictions and offences. Local data protection laws may restrict the way in which we can use this information when compared to, for example, your name and address.

## **Our responsibility to you**

# We process your personal information in our capacity as a ***controller***. This means that we are responsible for ensuring that we comply with relevant data protection laws when processing your personal information.

## **Data protection contact**

# You can raise any data protection queries with our Head of Compliance. You can contact our Head of Compliance by sending:

# an email to: julia.davis@premiare.uk or pmalcompliance@premiare.uk

#  or

# a letter to: Head Of Compliance, Premia UK Services Company Ltd, The Minster Building, 21 Mincing Lane, London, EC3R 7AG .

# **Your personal information**

## **Why are we collecting personal information about you?**

# We only collect personal information about you in connection with your prospective, or actual employment or engagement, and the running of our business more generally.

## **What personal information do we collect about you?**

# *(a) Prospective employees or individuals contracted to work on behalf of Premia*

# The types of information we *may* process about you include:

# Name, including your first, middle and last names and any preferred or other names;

# Title;

# Address;

# Postcode;

# Telephone, including home, mobile and work contact numbers;

# Email address;

# Details of your secondary and/or tertiary education;

# Professional qualifications;

# Statement in support of your application;

# Details within your submitted Curriculum Vitae (CV);

# Details of your right to work in a country or territory where we are located and your immigration status (where applicable);

# Data relating to your criminal convictions and offences, where appropriate;

# Information about your current employment, and your employment history for the previous 6 years, including:

# Name and address of employer(s);

# Address

# Job title;

# Start and end dates for your employment;

# Salary; and

# Notice period (for your current position, if any).

# In addition, we, or our third-party provider, will contact your references as provided in your application to confirm the employment information that you provide.

# If you are a Senior Manager, Certified Person or Non-Executive Director, we, or our third party provider, will contact your references as provided in your application, to obtain a Regulatory Reference. The information requested in these references is detailed on the Financial Conduct Authority’s website, at [www.handbook.fca.org.uk](http://www.handbook.fca.org.uk).

# As part of the application process you will also be asked to complete an equal opportunities monitoring form, which will ask you to provide such information as your age, sex, ethnicity, religious beliefs, etc. You have the right to not provide this additional information to us. In which case we will, where relevant, note to statutory bodies that you chose not to provide this information.

#  *(b) Actual employees or individuals contracted to work on behalf of Premia members*

# In addition to the personal information we collect about you as part of our recruitment and selection process, we will process further personal information about you in order to meet our responsibilities as an employer (where relevant), and to manage our ongoing relationship with you. This may include the following information:

# Date of birth;

# Marital status;

# Sickness information, including the reasons for any absence from work;

# Bank account details;

# Driving licence and/or passport details;

# Visa details (where applicable);

# Sick pay;

# Leave entitlement (including holidays, parental leave, maternity leave, paternity leave, adoption leave);

# Parental pay (including statutory maternity and paternity pay);

# Pensions data;

# Remuneration and benefits;

# Emergency contacts;

# Trade union membership (where relevant);

# Occupational health data;

# Information in relation to any complaints that you make;

# Data relating to performance and reviews;

# Data relating to any disciplinary or grievance proceedings in which you are involved;

# Data relating to your criminal convictions and offences, where appropriate;

# Leaving date and your reason for leaving (where applicable);

# Location of employment or workplace; and

# Where we operate CCTV, we may also capture your image on CCTV whilst you are on our premises.

## **Where do we collect your personal information from?**

# We collect your personal information from various sources, including:

# You;

# Your current or any previous employer;

# Recruitment agencies and head-hunters;

# Approved Business partners; such as our background check providers.

# Government agencies, regulators, compliance services, and credit reference agencies– for example, to validate or obtain information with respect to your immigration or right to work status, or to confirm whether or not you hold any criminal convictions.

# Examples of the types of personal information we may receive from third parties include: CVs; details of your right to work in a country or territory, and your immigration status (where applicable). In certain circumstances, we may receive special category personal information, or criminal convictions, data from third parties.

# Throughout the period of your employment or engagement, we will collect additional personal information in the course of your work-related activities.

# **Our use of your personal information**

How do we use your personal information?

# In this section we set out in more detail:

# the main purposes for which we use your personal information; and

# the legal bases upon which we are using your personal information.

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| **Purpose** | **Legal basis** |
| **As part of our recruitment and selection process.*** We will use your personal information to:
	+ Process your application for a position within our business; whether received for a particular role, or as a speculative application.
	+ Assess your suitability for a particular role or task and to decide whether to engage you; and
	+ Communicate with you about your application and the application process.
* In some cases, the information processed will include special category personal information, such as information on your ethnicity and disabilities.
* The information processed may also include criminal convictions data. In most instances, we will need details of your unspent convictions. In addition, for certain positions we may require a criminal records check to be carried out as part of the assessment of suitability, which will provide us with details of both unspent convictions and relevant spent convictions. You will be notified prior to the processing if this is a requirement of the role for which you have applied.
 | For all personal information – **performance of a contract**. The processing of your personal information may be necessary in relation to the contract we will enter into with you, should we decide to employ or engage you. For all information – **legitimate interests**. We have a legitimate interest in using your personal information to evaluate whether you have the necessary skills, qualifications and experience to carry out a role we are recruiting for.For special category personal information – **equality of opportunity or treatment**. We process special category personal information in order to monitor equality of opportunity/treatment. For special category personal information – **employment law obligations**. We process special category personal information where this is necessary, so that we can meet our obligations in the field of employment law.For criminal convictions data –**employment law obligations**. We will only process criminal convictions information where this is necessary so that we can meet our obligations in the field of employment law.  |
| **To manage our relationship with you** We will use your personal information to: * + Fulfil our obligations under our contract with you;
	+ Carry out our obligations in relation to pay and salary review and other remuneration and benefits;
	+ Provide and administer benefits (including pension, healthcare schemes, salary sacrifice schemes and others) that we offer and that apply to you;
	+ Support your training, health, safety and welfare requirements, including to make any necessary arrangements or adjustments to the workplace in the case of disability;
	+ Undertake performance appraisals and reviews;
	+ Undertake talent, performance and succession planning activities;
	+ Carry out any necessary investigations in respect of disciplinary matters or grievances, in relation to you, or another person;
	+ Provide you with access to relevant systems to undertake your role and manage your use of facilities;
	+ Communicate with you – for example, in the form of e-mails – in order to keep you informed about important developments within our businesses, and seminars and events relevant to your role with us;
	+ Maintain sickness and other absence records;
	+ Monitor compliance by you with our policies and your other contractual and legal obligations;
	+ Monitor your use of our networks to protect the security and integrity of our IT network and information and electronic communications systems; and
	+ Provide references and information to future employers.
* We may process special category personal information – for example, data relating to health in order to make reasonable adjustments for disabilities, and to provide relevant support to staff members with ill health.
 | For all personal information – **performance of a contract**.The processing of your personal information may be necessary in relation to your contract of employment.For all personal information – **compliance with a legal obligation**. In this context, we will often process personal information in order to comply with our legal obligations – for example, in respect of tax, sick pay or parental leave.For all personal information – **vital interests**. In certain circumstances, your personal information may be processed by us and transferred to the emergency services where this is required to protect your vital interests.For all personal information – **legitimate interests**.There are circumstances in which we may rely on our legitimate interests, or the legitimate interests of a third party, when processing your personal information. In particular, if we provide a reference to a future employer on your behalf, we will generally rely on the legitimate interests of that employer.For **special** category personal information – **employment law obligations**. We may process certain special category personal information where this is necessary so that we can meet our obligations in the field of employment law. For special category personal information – **occupational health purposes**. We may process special category personal information, in particular health information, in an occupational health context.For special category personal information – **vital interests**. Your special category personal information may be processed by us, and transferred to the emergency services where this is required to protect your vital interests.For special category personal information – **legal claims**. Your special category personal information may also be processed by us where this is necessary for the establishment, exercise or defence of legal claims. |
| **Internal and statutory reporting, audit and other legal obligations, including compliance with health and safety law, and monitoring equality of opportunity or treatment*** We will use your personal information to:
	+ Comply with our legal obligations, including our health and safety obligations;
	+ Produce statistics and research for internal and statutory reporting purposes;
	+ Manage our accounts and records; and
	+ Monitor our compliance with our responsibilities under equalities legislation.
* This may include the processing of special category personal information – for example, information about disabilities or ethnicity, in addition to religious beliefs, sexual orientation and political opinions.
 | For all personal information – **compliance with a legal obligation**.Much of our processing of your personal information in this context will be in order to comply with our legal obligations – for example, health and safety legislation and equal opportunities monitoring.For all personal information – **legitimate interests**. In these circumstances we may rely on our legitimate interests when processing your personal information.For special category personal information – **equality of opportunity or treatment**.We process certain types of special category personal information in order to monitor equality of opportunity/treatment.For special category personal information – **employment law obligations**. We may also process certain special category personal information where this is necessary so that we can meet our obligations in the field of employment law. |
| **The provision of commercial services to third parties*** We may, in certain circumstances, process your personal information when we provide our services to customers, and you are involved in the provision of those services.
 | For all personal information – **legitimate interests**. In these circumstances we may rely on our legitimate interests when processing your personal information. |
| **Identification and security, including information security** * We will process your personal information as part of our access control systems and for other security purposes, including in relation to information security and our IT systems and also via on-premises CCTV security cameras.
* We may use geo-tracking of general IP addresses enabling us to determine, based on a staff member's login information, the geographic region in which that staff member is based.
 | For all personal information – **legitimate interests**. In these circumstances we will generally rely on our legitimate interests in maintaining a secure environment for staff members, and in protecting our IT systems.  |
| **Marketing/publicity purposes*** We may take photographs or videos of you during your employment or engagement, including where you attend *events* organised by us or by a third party. These images will generally be used in our marketing/publicity materials.
* Your personal information may also be processed by us in a social media context – for example, where we publish an interview with you, profile about you or information about your work, on our website and social media platforms or share photographs or other images of you. This will generally be for our marketing/publicity purposes.
 | For all personal information – **legitimate interests**. When using your personal information for marketing or publicity purposes, we will generally rely on our legitimate interests in promoting our business, including our services, market intelligence reports and our events and seminars, our other activities and our overall aims and objectives.  |

Provision of information

# Please note that where the provision of personal information is a statutory or contractual requirement, or a requirement necessary to enter into a contract, and you do not provide us with the personal information required, we may:

# Not be able to process your application;

# Not be able to enter into, or perform an existing, contract of employment or engagement with you; or

# Be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

Consent

# We do not generally process your personal information based on your consent as we can usually rely on another legal basis. If we do process your personal information based on your consent, we will inform you of this before we start the processing, and you will have the right to withdraw your consent at any time.

# 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. Where your withdrawal of consent means that we are unable to do something that we have previously said we will do, for example, we are unable to perform our obligations under a contract of employment or engagement with you, we will immediately let you know.

Do we share your information with anyone else?

# We do not sell your information nor make it generally available to others. But we do share your information in the following circumstances:

# Your personal information may be disclosed to other organisations as required by law – for example, the provision of salary and tax data to governmental authorities such as tax authorities, for crime prevention, investigation or detection purposes or in order to protect your vital interests.

# Where there is a legitimate reason, we may also share your information with:

# Family, associates and your representatives; for example, if you fell ill and were taken to hospital, we may need to advise the person you gave us as your next of kin.

# Current, past or prospective employers;

# External companies which provide benefits, such as health cover and life assurance, where applicable. These external companies will sometimes need information about your health in order to provide these benefits, and the only basis for this processing might be consent. You are not obliged to give consent, but without access to your health information, these external companies might be unable to provide the benefit to you;

# Suppliers and service providers;

# Financial organisations;

# Certification bodies, industry bodies or associations, or government bodies which have dealings with us in connection with our business operations;

# Auditors;

# Police forces and security organisations;

# Courts and tribunals;

# Our Legal representatives;

# Local and central government, and their agencies – particularly those involved with tax and the right to work;

# Consultants and professional advisers – for example, external companies which provide us with professional HR services, such as lawyers and employment advisers;

# Trade union and staff associations, where applicable;

# Survey and research organisations;

# Press and the media, e.g. new appointment announcements.

# Landlords, e.g. for fire safety reasons.

# Shareholders;

# We use the services of various external organisations to help us run our business operations efficiently, particularly in relation to our HR and IT systems. Some of these services, such as email hosting and data backups, involve the service provider holding and using your personal information. In each case where we share your information with one of our service providers, the service provider is required to keep it safe and secure. They are also not permitted to use your information for their own purposes; and

# If we sell all or any part of our business, then your information will also be transferred to the new owner to enable the continuation of the business.

# **Other important things you should know**

Keeping your personal information safe

# We take security issues seriously. We implement appropriate steps to help maintain the security of our information systems and processes, for example with the use of passwords on all systems, and prevent the accidental destruction, loss or unauthorised disclosure of the personal information we process. Please refer to the IT Security Policy for full details.

Profiling and automated decision making

# We do not use profiling (where an electronic system uses personal information to try and predict something about you), or automated decision making (where an electronic system uses personal information to make a decision about you without human intervention).

How long do we keep your personal information?

# We do not keep your personal information forever.

# We keep your personal information in accordance with our Data Protection Policy which can be found on the Compliance Section of Sharepoint. Those periods are based on the requirements of relevant data protection laws. Which in turn considers: the purpose for which the information is collected and used, taking into account legal and regulatory requirements to retain the information for a minimum period, limitation periods for taking legal action, good practice and our business purposes.

Cross border transfers of your personal information

# The global nature of our business means that your personal information may be transferred across national boundaries, including, potentially, to countries that do not require organisations by law to look after your personal information in the way in which you have come to expect in your own country.

# Where we transfer your personal information across national boundaries, we will ensure that those transfers are made in compliance with all relevant data protection laws, and in accordance with our Data Protection Policy which can be found in the Compliance section of Sharepoint.

# If you would like further details of how your personal information is protected when transferred from one country to another then please email us at PMALcompliance@premiare.uk

#  **Your rights**

Contacting us and your rights

# If you have any questions in relation to our use of your personal information, please email us at julia.davis@premiare.uk

# You may also have the right to require us to:

# Provide you with further details on the use we make of your personal information;

# Provide you with a copy of the personal information we hold about you;

# Update any inaccuracies in the personal information we hold about you;

# Delete any of your personal information that we no longer have a lawful ground to use;

# Where processing is based on consent, stop that particular processing by withdrawing your consent;

# Object to any processing based on our legitimate interests unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights;

# Restrict how we use your personal information whilst a complaint is being investigated; and/or

# Transfer your personal information to a third party in a standardised machine-readable format.

# In certain circumstances, we may need to restrict your rights in order to safeguard the public interest (e.g. the prevention or detection of crime) and our interests (e.g. the maintenance of legal privilege).

# We are obliged to keep your personal information accurate and up to date. Please help us to do this by completing the Changes to Personal Details Form on the HR Intranet, and sending this to HR@premiare.uk .

# **Your right to complain**

# If you are not satisfied with our use of your personal information, or our response to any request by you to exercise your rights, or if you think that we have breached any relevant data protection laws, then you have the right to complain to the authority that supervises our processing of your personal information, the UK Information Commissioner’s Office. Their website address is ico.org.uk, or telephone number is 0303 123 1113.

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| Updated  | By  | Next review due |
|  February 2021 | HR | Feb 2022 |