

Woodley BioReg Limited

Data Protection Privacy Notice (Employment)

This notice explains what personal data (information) we hold about you, how we collect it, and how we use and may share information about you during your employment and after it ends. We are required to notify you of this information under data protection legislation. Please ensure that you read this notice (sometimes referred to as a 'privacy notice') and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

Who collects the information

Woodley BioReg Limited ('Company') is a 'data controller' and gathers and uses certain information about you.

Data protection principles

We will comply with the data protection principles when gathering and using personal information, as set out in our Data Protection Policy, which can be found in our policies folder.

About the information we collect and hold

The table set out in the Schedule summarises the information we collect and hold, how and why we do so, how we use it and with whom it may be shared.

We may also need to share some of the categories of personal information set out in the Schedule with other parties, such as external contractors, in particular Katherine Collins, our HR advisor, and our professional advisers and potential purchasers of some or all of our business or on a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations. We may also be required to share some personal information with our regulators or as required to comply with the law.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

Where information may be held

Information may be held at our offices, and third party agencies, service providers, representatives and agents as described above.

How long we keep your information

We keep your information during and after your employment for no longer than is necessary for the purposes for which the personal information is processed.

Your rights to correct and access your information and to ask for it to be erased

Please contact Ash Ramzan, who can be contacted on 01484 434343 or at Midland Mill, Hillhouse Lane, Huddersfield, if (in accordance with applicable law) you would like to correct or request access to information that we hold relating to you or if you have any questions about this notice. You also have the right to ask Dr Ramzan for some but not all of the information we hold and process to be erased (the 'right to be forgotten') in certain circumstances. Dr Ramzan will provide you with further information about the right to be forgotten, if you ask for it.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

How to complain

We hope that Dr Ramzan can resolve any query or concern you raise about our use of your information. If not, contact the Information Commissioner at ico.org.uk/concerns/ or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

THE SCHEDULE

ABOUT THE INFORMATION WE COLLECT AND HOLD

(In circumstances where you are a consultant or otherwise not strictly an employee of the Company, references below to items that are specific to employees, should be taken as reference to consultancy fees or other equivalent aspects of your relationship to the Company as appropriate. Note, however, that where your relationship with the Company began as an employee we may still retain and process data set out in the Schedule below relevant to you as an employee).

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Recruitment information (including references and other information included in a CV or cover letter or as part of the application process) <input type="checkbox"/>	From you, and/or recruitment consultants engaged by us	To enter into/perform the employment contract Legitimate interest: to maintain employment records and good employment practice	To enter into/perform the employment contract
Your name, contact details (ie address, home and mobile phone numbers, email address) and emergency contacts (ie name, relationship and home and mobile phone numbers) <input type="checkbox"/>	From you	To enter into/perform the employment contract Legitimate interest: to maintain employment records and good employment practice	To enter into/perform the employment contract
Photographs	From you	Legitimate interest: for internal and external promotional services	On the firm's intranet, website and marketing material
Details of salary and benefits, bank/building society, National Insurance and tax information, your age <input type="checkbox"/>	From you	To perform the employment contract including payment of salary and benefits Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice	To ensure you receive the correct pay and benefits Information shared with HM Revenue & Customs (HMRC)
Employment records (including job titles, location of employment, work history, working hours, training records and professional memberships)	From you	To perform the employment contract including payment of salary and benefits Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice	To ensure you receive the correct pay and benefits Information shared with HM Revenue & Customs (HMRC)
Details of your	From you	To perform the	To ensure you receive

spouse/partner and any dependants ☒		employment contract including employment-related benefits, eg private medical insurance, life assurance, childcare vouchers and pension	the correct pay and benefits Information shared with HM Revenue & Customs (HMRC)
Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information ☒	From you and, where necessary, the Home Office	To enter into/perform the employment contract To comply with our legal obligations Legitimate interest: to maintain employment records	To carry out right to work checks Information may be shared with the Home Office
A copy of your driving licence/insurance documentation ☒	From you	To perform the employment contract To comply with our legal obligations To comply with the terms of our insurance	To ensure that you have a clean driving licence To administer travel expenses Information may be shared with our insurer
Details of your pension arrangements, and all information included in these and necessary to implement and administer them ☒	From you, from our pension administrators and (where necessary) from your own pension fund administrators	To perform the employment contract including employment-related benefits To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice	To administer your pension benefits AND To comply with our auto-enrolment pension obligations Information shared with our pension administrators and with HMRC
Information in your sickness and absence records (including sensitive personal information regarding your physical and/or mental health) ☒	From you, from your doctors, from medical and occupational health professionals we engage and from our insurance benefit administrators	To perform the employment contract including employment-related benefits To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice, to ensure safe working practices	To maintain employment records, to administer sick pay entitlement, to follow our policies and to facilitate employment-related health and sickness benefits To comply with our legal obligations to you as your employer Information shared with your doctors, with medical and occupational health professionals we engage and with our insurance benefit administrators

Information in relation to annual leave <input type="checkbox"/>	From you	To perform the employment contract including payment of salary and benefits Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice Business management and planning, including accounting and auditing	To ensure you receive the correct pay and benefits Information shared with HM Revenue & Customs (HMRC) To ensure effective staff coverage
Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs	From you	To comply with our legal obligations and for reasons of substantial public interest (equality of opportunity or treatment)	To comply with our equal opportunities monitoring obligations and to follow our policies
Criminal records information, including the results of Disclosure and Barring Service (DBS) checks <input checked="" type="checkbox"/>	From you and the DBS	To perform the employment contract To comply with our legal obligations For reasons of substantial public interest (preventing or detecting unlawful acts, suspicion of terrorist financing or money laundering in the regulated sector and protecting the public against dishonesty)	To carry out statutory checks Information shared with DBS and other regulatory authorities as required
Information on grievances raised by or involving you	From you, from other employees and from consultants we may engage in relation to the grievance procedure	To perform the employment contract To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice	For staff administration, to follow our policies and to deal with grievance matters Information shared with relevant managers, HR personnel and with consultants we may engage
Information on conduct issues involving you	From you, from other employees and from consultants we may engage in relation to the conduct	To comply with our legal obligations Legitimate interests: to maintain employment records and to comply	For staff administration and assessments, to follow our policies, to monitor staff performance and conduct and to deal

	procedure	with legal, regulatory and corporate governance obligations and good employment practice, to ensure safe working practices	with disciplinary and grievance matters Information shared with relevant managers, HR personnel and with consultants we may engage
Details of your appraisals and performance reviews	From you, from other employees and from consultants we may engage in relation to the appraisal/performance review process	To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice, to ensure safe working practices	For staff administration and assessments, to follow our policies, to monitor staff performance and conduct and to deal with disciplinary and grievance matters Information shared with relevant managers, HR personnel and with consultants we may engage
Details of your performance management/improvement plans (if any)	From you, from other employees and from consultants we may engage in relation to the performance review process	To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice, to ensure safe working practices	For staff administration and assessments, to follow our policies and to monitor staff performance Information shared with relevant managers, HR personnel and with consultants we may engage
Details of your time and attendance records	From you [and from the key fob/entry card system]	To perform the employment contract Legitimate interest: to monitor and manage staff access to our systems and facilities and to record staff absences	For payroll and staff administration and assessments, to follow our policies and to monitor staff performance and attendance Information shared with relevant managers, HR personnel and with consultants we may engage
Information regarding your work output	[details of system used if any]	To perform the employment contract Legitimate interests: to maintain employment records	For staff administration and assessments, to follow our policies and to monitor staff performance and attendance Information shared

			with relevant managers, HR personnel and with consultants we may engage
Information in applications you make for other positions within our organisation	From you	<p>To enter into/perform the employment contract</p> <p>To comply with our legal obligations</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice</p>	<p>To process the application</p> <p>Information shared with relevant managers, HR personnel and with consultants we may engage</p>
Information about your use of our IT, communication and other systems	Automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, remote access systems, email and instant messaging systems, intranet and Internet facilities, telephones, voicemail, mobile phone records and mobile device management systems	<p>Legitimate interests:</p> <p>to monitor and manage staff access to our systems and facilities</p> <p>to protect our networks, and personal data of employees and customers/clients, against unauthorised access or data leakage</p> <p>to ensure our business policies, such as those concerning security and internet use, are adhered to</p> <p>for operational reasons, such as maintaining employment records, recording transactions, training and quality control</p> <p>to ensure that commercially sensitive information is kept confidential</p> <p>to check that restrictions on your activities that apply after your employment has ended (post-termination restrictions or restrictive covenants) are being complied with</p> <p>for security vetting and investigating complaints and allegations of criminal</p>	<p>To protect and carry out our legitimate interests (see adjacent column)</p> <p>Information shared with relevant managers, HR personnel and with consultants we may engage</p>

		<p>offences</p> <p>for statistical analysis</p> <p>to prevent unauthorised access and modifications to our systems</p> <p>as part of investigations by regulatory bodies, or in connection with legal proceedings or requests</p>	
<p>Details of your use of business-related social media, such as LinkedIn</p>	<p>From relevant websites and applications</p>	<p>Legitimate interests:</p> <p>to monitor and manage staff access to our systems and facilities</p> <p>to protect our networks, and personal data of employees and customers/clients, against unauthorised access or data leakage</p> <p>to ensure our business policies, such as those concerning security and internet use, are adhered to</p> <p>for operational reasons, such as maintaining employment records, recording transactions, training and quality control</p> <p>to ensure that commercially sensitive information is kept confidential</p> <p>to check that restrictions on your activities that apply after your employment has ended (post-termination restrictions or restrictive covenants) are being complied with</p> <p>for security vetting and investigating complaints and allegations of criminal offences</p> <p>as part of investigations by regulatory bodies, or in connection with legal proceedings or requests</p>	<p>To protect and carry out our legitimate interests (see adjacent column)</p> <p>Information shared with relevant managers, HR personnel and with consultants we may engage</p>
<p>Your use of public social media (only in very limited)</p>	<p>From relevant websites and</p>	<p>Legitimate interests:</p>	<p>To protect and carry out our legitimate</p>

<p>circumstances, to check specific risks for specific functions within our organisation; you will be notified separately if this is to occur)</p>	<p>applications</p>	<p>to monitor and manage staff access to our systems and facilities</p> <p>to protect our networks, and personal data of employees and customers/clients, against unauthorised access or data leakage</p> <p>to ensure our business policies, such as those concerning security and internet use, are adhered to</p> <p>for operational reasons, such as maintaining employment records, recording transactions, training and quality control</p> <p>to ensure that commercially sensitive information is kept confidential</p> <p>to check that restrictions on your activities that apply after your employment has ended (post-termination restrictions or restrictive covenants) are being complied with</p> <p>for security vetting and investigating complaints and allegations of criminal offences</p> <p>as part of investigations by regulatory bodies, or in connection with legal proceedings or requests</p>	<p>interests (see adjacent column)</p> <p>Information shared with relevant managers, HR personnel and with consultants we may engage</p>
<p>Details in references about you that we give to others</p>	<p>From your personnel records, our other employees</p>	<p>To perform the employment contract</p> <p>To comply with our legal obligations</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice</p>	<p>To provide you with the relevant reference</p> <p>To comply with legal/regulatory obligations</p> <p>Information shared with relevant managers, HR personnel and the recipient(s) of the reference</p>

You are required (by law or under the terms of your contract of employment, or in order to enter into your contract of employment) to provide the categories of information marked 'a' above to us to enable us to verify your right to work and suitability for the position, to pay you, to provide you with your contractual benefits, and to administer statutory payments such as statutory sick pay (SSP). If you do not provide this information, we may not be able to employ you, to make these payments or provide these benefits.