

HR Processing Privacy Policy

Who We Are

Controlaccount Plc ("Controlaccount") ('we' or 'us' or 'our') gather and process your personal information in accordance with this privacy notice and in compliance with the General Data Protection Regulation and relevant UK data protection Regulation and laws. This privacy notice details how we process personal data from applicants, employees and leavers.

Controlaccount is a debt collection agency providing credit management solutions to businesses. Controlaccount's registered office is at Compass House, Waterside, Hanbury Road, Bromsgrove, Worcestershire B60 4FD and we are a company registered in England and Wales under company number 02765607. We are registered on the Information Commissioner's Office Register; registration number Z6855987, and act as the data controller/data processor when processing your data. Our designated Data Protection Compliance Officer is **Susan Winnington** who can be contacted at Compass House, Waterside, Hanbury Road, Bromsgrove, Worcestershire B60 4FD. We do update this Notice from time to time so please do review this Notice regularly.

Information That We Collect About You

We process individual personal information to meet our legal, statutory and contractual obligations and to enable us to recruit, employ and train you in the course of your employment with us to enable us to undertake our business. The information we process includes;

- Names
- Addresses
- Contact details
- Financial information
- Employment information including references obtained
- Identification
- Educational information
- Maternity/Paternity information
- Disciplinary and Grievance records
- Time & Attendance records
- Informal meeting records
- Unspent criminal convictions
- Criminal and legal proceedings
- Opt in/Out Notices in relation to working time and pensions

We also process Special Category Sensitive Data;

- Physical or mental Health & medical information
- Absence & sickness records
- Details about religion, disabilities, ethnic origin, sexual orientation, gender, nationality, marital status, caring responsibilities.

How We Use Your Personal Data (Legal Basis for Processing)

We process your information to help us carry out our duties. Much of the information we hold will have been provided by you, but some may come from other internal sources, such as your Manager,

or in some cases external sources, such as referees covering references after termination of your employment.

The purpose and reasons for processing your personal data are for at least one of the following;

- You have given your consent to us using the personal information in that way
- We process your personal data in the performance of a contract as your employer, to ensure that we meet our legal employer obligations and the requirements of employment law
- We process your personal data as part of our legal obligation for business accounting, payroll and tax purposes
- We process your personal data under legitimate interests to carry our CRB and credit reference agency checks as part of our due diligence measures

We process special category data about you meet contractual and legal obligations and to carry out our duty of health and safety as well as ensuring non-discriminative working practices.

Where we collect such information, we do so under the **GDPR's Article 9(2)b and the Data Protection Act Schedule 1, Part 1 (1) – Employment**. We will only request and process the minimum necessary for the specified purpose and ensure that the required protective measures and security is placed on all special category data.

How We Share Your Personal Data

Controlaccount takes your privacy very seriously and will never disclose, share or sell your data without your consent; unless required to do so by law. We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement.

As a company engaged in providing debt collection activities, we may sometimes need to process your data to pursue our legitimate business interest. For example, to prevent fraud, administrative purposes, or reporting potential crimes. We will never process your data where these interests are overridden by your own interests.

You will be referred to in many company documents and records that are produced by you and your colleagues in the course of carrying out your duties and the business of the company. You should refer to the Data Protection Policy which is available on the intranet.

Where we process special categories of information relating to your race or ethnic origin, political opinions, religious and philosophical beliefs, biometric data or sexual orientation, we will always obtain your explicit consent to these categories unless this data is not required by law or the information is required to protect your health in an emergency. Where we are processing data based on your consent, you have the right to withdraw that consent at any time.

We may transfer information about you to other group companies for the purposes connected with your employment or the management of the company's business.

Controlaccount uses a third party to provide the below services and business functions; however, all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures.

Health cash Plan; Healthcare provider of employee health cash plan policy. Personal details containing name, address and DOB for shared securely and confidentially to enable them to process your health policy.

Corporate Life Cover Policy; Personal details including name, DOB, employment dates and salary are shared securely and confidentially to the provider. Expression of wishes provided by employee will be shared with the provider in the event that the policy needs to be used.

Other than as mentioned, we will only disclose information about you to third parties if we are legally obliged to do so or where we need to comply with our contractual duties to you, for instance, we may need to pass on certain information to our pension and health insurance schemes.

We may transfer information about you to other group companies for the purposes connected with your employment or the management of the company's business.

Transfers Outside the EU

Personal data in the European Union is protected by the General Data Protection Regulation (GDPR) but some other countries may not necessarily have the same high standard of protection for your personal data. Controlaccount does not transfer or store any personal data outside the EU.

In limited and necessary circumstances, if your information may be transferred outside of the EEA or to an international organisation to comply with our legal or contractual requirements. We have in place safeguards including, (detail safeguards) to ensure the security of your data. a copy of the safeguards can be obtained from the Business Services Director, Ian Mitchell.

How Long We Keep Your Personal Data

Controlaccount only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. We take into account;

- The reasons why we are processing your personal information
- Whether the law requires us to continue to process your personal information
- Whether we have a business reason to continue to process your personal information

We are required under UK tax law to keep your basic personal data (*name, address, contact details*) for a minimum of 6 years after which time it will be destroyed.

As your employer, the Company needs to keep and process information about you for employment purposes. The information we hold and process will be used for our management and administration use only. We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully, and appropriately, during the recruitment process, whilst you are working for us, at the time when your employment ends and after you have left.

This includes using information to enable us to comply with the Employment Contract, to comply with any legal requirements, pursue the legitimate interests of the Company and protect our legal position in the event of legal proceedings. If you do not provide this data, we may be unable, in some circumstances, to comply with our obligations and we will tell you about the implications of that decision.

Where necessary, we may keep information relating to your health, which could include reasons for absence and GP reports and notes. The information will be used in order to comply with our health

and safety and occupational health obligations in considering how your health affects your ability to do your job and whether adjustments to your job may be appropriate. We will also need this data to administer and manage statutory and company sick pay, health insurance or life insurance policies such as death in service policies.

In addition, we monitor computer and telephone use, as detailed in our computer / telephone / electronic communications policy available on the intranet. We also keep details of your hours by way of a business access and control system as detailed in the Employee Handbook in line with contractual terms.

Your personal data will be stored for a period of time. The criteria used for determining how long your data is stored for is contained in the Retention of Data register located on the intranet.

If in the future we intend to process your personal data for a purpose other than that which it was collected, we will provide you with information on that purpose and any other relevant information.

Your Rights

You have the right to access any personal information that Controlaccount processes about you and to request information about: -

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing (*where applicable*) in accordance with the data protection laws; as well as to object to any direct marketing from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we may use.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure

Safeguarding Measures

Controlaccount takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, including: strict access control to stored physical personal data, restricted access to electronic data, encryption of data during storage and transmission. As an ISO27001 accredited company

Controlaccount plc continuously assesses the security of its data and verifies this each year with an independent external audit assessment.

Lodging A Complaint

Controlaccount is the controller and processor of data for the purposes of the EU General Data Protection Regulation and all current UK laws and Regulations. Controlaccount only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you have any concerns as to how your data is processed, or wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

Susan Winnington
Legal and Compliance
Compass House
Waterside
Hanbury Road
Bromsgrove
B60 4FD

Telephone: 01527 888479
Email: compliance@controlaccount.com

The Information Commissioner's Office (ICO) can be contacted at: -

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone: 0303 123 1113 (*local rate*) or 01625 545 745 (*national rate*)
Fax: 01625 524 510
Email: enquiries@ico.org.uk