Privacy Notice for Employees

The purpose of this document

Realise Training Group and all subsidiaries are committed to protecting the privacy and security of the personal information about our current and former employees. This Privacy Notice describes how Realise Training Group collects, uses and stores, both during and after the end of your working relationship with us, personal information about you, as a current or former employee, in accordance with the law.

It is important that you read this Privacy Notice in conjunction with any other Privacy Notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Our legal basis for collecting and using information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information where:

- we need the information to fulfil the obligations we owe you under the contract which we have entered into with you;
- we need to comply with an obligation in law; and/or
- it is necessary for our legitimate interests as a commercial business to develop and support our business activities and your interests and fundamental rights do not override our legitimate interests.

We may also, exceptionally, use your personal information where:

- we need to protect your (or someone else's) vital interests; or
- we need to perform a specific task in the public interest or for official purposes set out in law.

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

Data protection principles in law

In collecting, using and storing personal information about you we will comply with the law. The law says that the personal information we hold about you must be:

- used lawfully, fairly and in a transparent way;
- collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;

- relevant to the purposes we have told you about and limited only to those purposes;
- accurate and kept up to date;
- kept only as long as necessary for the purposes we have told you about; and kept securely.

The categories of information we collect and hold about you

We collect, use and store personal data about you. Personal data, or personal information, means any information about a living individual from which that person can be identified. The personal data which we collect, store and use about you will include such information as the following:

- personal contact details, such as name, title, addresses, telephone number and email address;
- date and place of birth;
- nationality;
- gender;
- military status;
- marital status and dependants;
- next of kin and emergency contact information;
- National Insurance Number;
- bank account details, payroll records and tax status information;
- salary, annual leave, pension and benefits information, including company car grade;
- copies of driving documentation such as driving licence, MOT and business use insurance;
- vehicle information, including make, model and registration;
- start date;
- location of employment or workplace;
- recruitment information (including copies of right to work documentation, references, psychometric test results and other information included in a CV or cover letter or as part of the application process);
- employment and training records (including job titles, work history, working hours, qualification and training documentation and professional memberships);
- level of proficiency in use of the English language, both spoken and written;
- expenses history;
- compensation history;
- performance information;
- employee relations information, such as disciplinary and grievance;
- opinions as to your conduct in an incident;
- CCTV footage and other information obtained through electronic means, such as swipecard records;
- information about your use of our information and communications systems, including asset/device data;
- photographs and digital images showing your face; and
- TUPE Employee Liability Information (ELI).

We may also collect, store and use the following “special categories” of more sensitive personal information about your:

- race or ethnicity, religious, philosophical beliefs and political opinions;
- trade union membership;
- sexual orientation;
- health, including details of any disability, medical condition, health and sickness issues, drug and alcohol test results and details of any work-related injuries you have sustained; and
- criminal convictions and offences.

Our purpose in collecting information about you

We collect, use and store information about you for a variety of different reasons relating to your employment, including but not limited to:

- 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;
- paying you and, if you are an employee, deducting tax and National Insurance contributions;
- liaising with and providing reward and benefits to you such as Pension and Healthcare;
- administering the contract we have entered into with you;
- for business management and planning, including accounting and auditing;
- determining performance requirements, conducting performance reviews and managing performance;
- 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;
- identifying education, training and development requirements;
- dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work;
- ascertaining your fitness to work;
- managing sickness absence;
- complying with health and safety obligations;
- preventing fraud;
- monitoring your use of our information and communication systems to ensure compliance with our IT policies;
- ensuring network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution;

- conducting data analytics studies to review and better understand employee retention and attrition rates;
- collecting data for the purposes of mandatory security clearances required for certain contracts;
- sharing data with 3rd parties where we are required to do so to comply with contractual requirements with clients and/or for audit purposes;
- complying with requirements to transfer personal data to your new employer on termination of our contract with a client;
- for internal communications, HR employment related communications, PR and marketing purposes;
- allowing you access to relevant areas of a given site e.g. access control cards;
- supporting marketing and promotional activity;
- supporting prequalification and bidding requirements; and
- monitoring equal opportunities.

Our purpose in collecting special categories of personal information about you

We collect, use and store special categories of personal information about you for a variety of different reasons, including but not limited to using information about your:

- race or national or ethnic origin, religious, philosophical or moral beliefs, or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting;
- trade union membership information to pay trade union premiums, register the status of a protected employee and to comply with employment law obligations;
- physical or mental health or disability, and next of kin details, for the purposes of administering any pension scheme which you are a member of, including making decisions about ill-health retirement;
- leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws;
- physical health, mental health, disability status, health and sickness records, and drug and alcohol test results, 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, including any private medical or permanent health insurance, or death in service benefit; and
- criminal convictions to vet your suitability for certain types of job role. We do not envisage that we will hold details of any criminal convictions beyond the defined retention period permitted by the Disclosure and Barring Service but, if we do, we will write to you to confirm the reasons for such exceptional retention.

How your personal information is collected

Typically, we will collect, use and store personal information about you as part of the application, recruitment and (where applicable) TUPE process. This information will be collected either directly from you or sometimes from third parties such as employment agencies, background check providers, former employers, credit reference agencies or other background check agencies.

We will collect, use and store additional personal information about you, both directly from you and from other members of our workforce, as a result of you undertaking job-related activities, throughout the period of you working for us.

You are, generally, under no statutory obligation to provide us with personal information about you but if you do not do so then we may be unable to fulfil our obligations to you.

Persons whom we will share your personal information with

We may 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 a legitimate interest in doing so.

Such third parties may include customers and third-party service providers (including contractors and designated agents) undertaking activities on our behalf, such as: payroll, pension administration, benefits provision and administration, occupational health professionals, background checks, electronic employee file management, IT services, training administration, driving license checks, insurance claims administration, document management, travel management, travel and expense management and administering the Employee Rewards Programme.

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

Our investment partners, Endless LLP, act as a data controller of any employee data that is provided to them, and throughout this partnership personal data may be transferred in conjunction with our privacy statement and the Endless Privacy statement here: https://www.endlessllp.com/portfolio-privacy-statement Endless LLP is a company incorporated in England and Wales with Company Reg. No. OC316569.

Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision about you without human intervention. We do not envisage that any decisions will be taken about you using automated means. However, we will notify you, in writing, in advance if this position changes and give you a minimum of 21 days to request us to reconsider.

Transfer of your personal information outside of the European Union

We will not ordinarily transfer any personal information about you outside of the European Union or to any country which has not been approved by the European Union as having the necessary data protection laws in place the confidentiality, integrity and availability of your information. If it does become necessary for us to do so, we will take the appropriate steps required by law to ensure that adequate safeguards are in place to protect your personal information.

The period which we will hold your personal information for

We will only retain your personal information for as long as is necessary to fulfil the purposes we collected it for and to satisfy any legal, accounting, or reporting requirements. To determine the appropriate retention period, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of the personal data, the purposes for which we process the personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. Once the retention period has expired, we will destroy your personal information by secure means.

Your duty to inform us of changes to your personal circumstances

It is important that the personal information we hold about you is accurate and current. If your personal information changes during your working relationship with us:

- Please notify our HR team by telephone or email.

Your rights in connection with your personal information

By law, you have the right to:

- request access to (usually by means of being provided with a copy of) your personal information. This is commonly known as a “Data Subject Access Request”); • request correction of the personal information that we hold about you which is incomplete or inaccurate;
- request the erasure of your personal information, where there is no good reason for us continuing to process it;
- object to our processing of your personal information, where we are relying on our legitimate interests (or those of a third party) to justify our processing of your personal information or where we are processing your personal information for direct marketing purposes;
- request the suspension of the processing of your personal information. For example, if you want us to establish its accuracy or the reason for processing it; and/or
- request the transfer of your personal information to another party. In addition, you also have the right to withdraw your consent, to the extent that you have previously given us your consent, to the processing by us of personal information about you (although we may still be entitled by law to do so).

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

Making a complaint in relation to our handling of your personal information

We have appointed a Data Protection Officer (DPO) to oversee compliance with this privacy notice. If you have any questions or concerns about this privacy notice or how we handle your personal information, you can speak to your Line Manager in the first instance or you can contact the Data Protection Officer.

Data Protection Officer: Patrick Richter
Address: Moor Farm Rd, Units 3-5 Runway Business Park, Ashbourne, DE6 1HD

Email: DPO@smartenergytraining.co.uk

Further or alternatively, you have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, or to seek redress through the courts