



Background

In this policy we have set out the personal data that we collect from and about you, how it is used and to whom the information is disclosed. It is important to note that this policy is non contractual.

About us

Clearwater DC 2001 Ltd are committed to protecting the personal data we have access to and process and have developed privacy policies to cover groups of individuals whose personal data we may hold. This particular policy relates to all the personal information of people that apply to or are employed by us.

Personal Data

Personal data is information about an identifiable individual that could lead to them being treated differently. The types of personal data we process includes name, address, telephone, personal email address and previous employment. For employees we also hold date of birth, NI number, next of kin details and any other information necessary for our business purposes and to administer their employment.

What information do we collect and where does it come from?

We collect and maintain personal data from individuals when they apply for a role with us and from our employees through a number of routes such as:

- CVs, references, interview notes;
- contracts and offers of employment;
- employee joining forms;
- recruitment, promotion, training, redeployment and/or career development;
- administration and payment of wages;
- calculation and administration of certain benefits;
- disciplinary or performance management purposes;
- performance review/appraisals;
- compliance with legislation;
- workforce and succession planning; and
- provision of references to future potential employers (subject to the individual's written agreement)

Generally we collect personal data directly from you. If the personal information we collect comes from a third party we will obtain your permission before we seek out this information (permission may be given directly by you, or implied from your actions). Sometimes we may collect information from organisations (such as a recruitment agencies) in the course of them providing services to us. In this case, we will take reasonable steps to ensure that they have the right to disclose your personal information to us.

Why do we collect the information?



Our lawful reason for processing your data is based on our legitimate business interests for candidates and for employees because we need to process your data to carry out our obligations under the contract of employment. Without it we cannot administer your employment properly and for applicants, we need to administer a successful recruitment process.

What do we do with the information?

We use the personal data for business purposes including establishing, managing and terminating your employment relationship. For example we need to:

- Determine eligibility for employment
- Administer pay and benefits
- Undertake processes within the employee lifecycle such as induction and new starter processes; maternity, paternity, flexible working, sickness absence, managing performance, disciplinary and grievances, undertaking appraisals, promotions, training etc.
- Undertake any other reasonably related purpose
- We may use your personal information without your knowledge or consent where we are permitted or required by law or regulatory requirements to do so.

Special Categories of Data

We may also process some special categories of data (in line with GDPR lawful processing requirements) including:

- Medical/health information
- Any protected characteristics
- Information about criminal convictions (where appropriate/relevant)

Our legal basis for processing this data is that we need to process this data for our legitimate business interests and to carry out your contract and at times, also to comply with law.

We would only collect and process this data if it is absolutely necessary and we ensure we have strict security around access to this data.

Monitoring

As part of your employment we monitor compliance with policies such as our IT policy, therefore, we have the capability to monitor individual's computer and email usage and it is important to note that when using company equipment or resources, employees should not have any expectation of privacy with respect to their use of this equipment or resources.

Disclosing and Sharing Personal Data

We may share your personal information with our employees, contractors, consultants and other parties who require such information to assist us with establishing, managing or terminating our employment relationship with you, including parties that provide products or services to us or on our behalf, such as employee pay and benefit providers. When we share personal information with these parties we require that they only use or disclose personal information in a manner consistent with the use and disclosure provisions of this Privacy Policy. We also ensure that any contract with



these organisations contains necessary privacy and security provisions in line with data protection legislation.

How long will we keep data for?

There are some legal and regulatory requirements which govern how long we should retain your personal data. Outside of these we endeavour to retain your personal information only for as long as we believe is necessary to fulfil the purposes for which the personal information was collected (including for the purpose of meeting any legal, accounting or other reporting requirements or obligations). We may, instead of destroying or erasing your personal information, make it anonymous so that it cannot be associated with or tracked back to you.

In general we will keep recruitment data for up to 6 months after the recruitment process/campaign. For employees who have left the organisation, we will after 2 years just maintain enough data necessary for providing reference information should the individual authorise us to provide it.

The rights of individuals whose personal data we process

If we are processing your personal data you have the following rights:

- The right to be informed of what data we are processing, what for, how we obtained the data and to whom it is released.
- Subject to certain conditions as set out in 'Access to your personal data' below, you have the right to access the data we are processing on you
- The right to rectification of the data if incorrect or inaccurate
- The right of erasure (in certain circumstances such as where you gave your consent to process)
- The right to restrict processing (to request that we do not process data for certain activities in certain circumstances)
- The right to data portability (where appropriate)
- The right to object
- The right not to be subject to automated decision making

Signed

Murray Pitcairn
Managing Director

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