

PRIVACY NOTICE FOR EMPLOYEES, WORKERS AND CONTRACTORS

BACKGROUND

This privacy notice sets out how we, MCPC Systems (UK) Ltd (“MCPC”), collect, store and use information about you as an employee, worker, or contractor.

MCPC is committed to protecting the personal information we process about you, and meeting our obligations for processing personal information under the EU’s General Data Protection Regulation (“GDPR”). We have put together this Privacy Notice to ensure we are processing your personal information in a transparent, fair and lawful manner.

MCPC is the data controller of the personal information and data that you provide to us.

This privacy notice was last updated on 25th May 2018.

WHY DO WE COLLECT INFORMATION ABOUT YOU?

During your engagement with us as an employee, worker or contractor of MCPC, we collect your personal information so that we can:

- undertake recruitment and selection,
- effectively manage your employment or contract with MCPC (in accordance with any written contracts or agreements you sign with us as part of your engagement with us), e.g. payroll, performance monitoring, and
- meet our legal obligations as an employer under UK law, including the sharing of your information with other organisations (e.g. HMRC).

We need to process information about you at various stages of your engagement with MCPC, including before (e.g. during recruitment and selection) and after (e.g. after termination of your employment, or redundancy) you are actively engaged with us as an employee, worker or contractor.

WHAT INFORMATION DO WE COLLECT ABOUT YOU?

Information collected	Purpose	Legal basis for processing
Your contact details (name, home address, personal email address, personal telephone numbers) and bank account details	Administering your employment, including payment of your wages, salary, national insurance, tax, pensions contributions, and expenses, AND/OR to process your application to a vacant position at MCPC as part of our recruitment and selection processes	Necessary for the performance of a contract, to which you are a party. The company has legitimate interests in the processing of this information.
Proof of your identity (e.g. your passport, driving licence), national insurance number	To evidence your right to work in the UK and enable payment of wages, salary, national insurance, tax and pension contributions.	Necessary for the performance of a contract, to which you are a party. This is also necessary to comply with a legal requirement under UK law.
Your curriculum vitae ("CV"), resumé or employment history and references from your past employers	Recruitment and selection	The company has legitimate interests in the processing of this information.
Disciplinary, grievance and performance related (e.g. appraisals/ performance review) records	To fulfil our commitments as an effective employer, including providing opportunities for recourse where employees, workers or contractors have concerns about their employment/engagement with the company, and opportunities to take appropriate action in the event of conduct or performance concerns.	Necessary for the performance of a contract, to which you are a party. The company also has legitimate interests in the processing of this information.
Absence & leave records (e.g. holiday, sickness and parental leave)	To fulfil our commitments as an effective employer, including providing opportunities for the company to take appropriate action in the event of conduct or performance concerns.	Necessary for the performance of a contract, to which you are a party. The company also has legitimate interests in the processing of this information.
Photographs, video recordings, or audio recordings of you (e.g. recorded telephone calls)	To fulfil our commitments as an effective supplier, including maintaining and monitoring the quality of our services delivered to customers. To provide our prospective or actual customers with information about our company, its services and its team.	The company has legitimate interests in the processing of this information. Your express consent, given freely and in advance of our processing of this information for this purpose. You may withdraw this consent at any time.

SENSITIVE PERSONAL INFORMATION WE COLLECT ABOUT YOU

Sensitive information collected	Purpose	Legal basis for processing
Medical information	<p>To fulfil our commitments as an effective employer, including:</p> <p>ensuring your legal rights are met,</p> <p>protecting your health & safety,</p> <p>providing opportunities for recourse where employees, workers or contractors have concerns about their employment/engagement with the company, and opportunities to take appropriate action in the event of conduct or performance concerns.</p>	<p>Necessary for the performance of a contract, to which you are a party.</p> <p>Necessary for the performance of a contract, to which you are a party.</p> <p>Necessary to comply with a legal requirement under UK law.</p> <p>The company has legitimate interests in the processing of this information.</p>
Criminal records information	<p>To ensure legal rights are met</p> <p>To protect clients, other employees and other parties engaged with the company, where it is relevant to the capacity and nature of your engagement with the company and its activities</p> <p>To take appropriate action in the event of any concerns raised about an employee, worker or contractor</p>	<p>Necessary for the performance of a contract, to which you are a party.</p> <p>Necessary to comply with a legal requirement under UK law.</p> <p>The company has legitimate interests in the processing of this information.</p>

HOW DO WE COLLECT INFORMATION ABOUT YOU?

We may collect your personal information through the following ways:

- when you apply for a vacancy with us, or contact us about prospective vacancies,
- when we request or receive information about you through a third party, e.g. HMRC, security screening services or recruitment agencies,

- when you enter into employment, work or another written agreement to engage with us,
- when you access or we implement any relevant HR or employment policies, procedures or services during your engagement with us (e.g. grievance, or applications for parental leave), and
- when we conduct employee, worker or contractor satisfaction surveys or interviews as part of our commitment to be an effective employer (although you are not obliged to fulfil these requests).

WHO DO WE SHARE INFORMATION ABOUT YOU WITH?

In certain cases, we may need to share or disclose information about you to other individuals, companies, parties or outside bodies. These are:

- other MCPC employees involved in the administration or management of your employment,
- relevant third-party suppliers, professional advisors or contractors who provide services to us, and
- (when we are legally obliged to do so) relevant government and legal bodies, such as HMRC and the police.

In all cases, we are committed to protecting your personal information when sharing it. We will take all reasonable efforts to ensure the provisions of appropriate security and confidentiality practices of parties with whom we share information about you.

HOW LONG WILL WE RETAIN INFORMATION ABOUT YOU?

We are committed to retaining your information for only as long as it is relevant to the purposes for which we collected it. Our specific retention periods are as follows:

- Where we process information about you to meet the terms of the **contract or other written agreement**, we will retain this information for 6 years after the end of your employment or engagement with the us.
- Where we process information about you to meet the **legitimate interests** of our company, we will retain this information for a minimum of 3 years after the end of your employment or engagement with us. You may, however, request that this information about you is removed before this point. MCPC is committed to evaluating these requests fairly with consideration of your rights under GDPR, and then acting accordingly upon this.
- Where we process information about you to meet our **legal obligations** as an employer, we will retain this information for as long as required under the relevant law (e.g. Health and Safety at Work, or Employment laws).
- Where we process information about you **with your consent** as our legal basis for doing so, we will retain this information for as long as you grant your

consent or until the termination of your employment or engagement with us, whichever is sooner.

HOW DO WE PROTECT YOUR INFORMATION?

MCPC is committed to utilising effective processes and infrastructure to ensure the protection of your information while we process it. This includes both our manual (e.g. paper based) and digital (e.g. software and electronic storage) processing systems.

We regularly review our policies, processes and those of any relevant third-party service providers to ensure they meet the standards set out by UK and EU data protection law and our own standards for the protection of your data.

Our processes, policies and infrastructure also externally audited annually against the Cyber Essentials Plus standard for 'cyber hygiene' within our organisation. The Cyber Essentials Plus standard is a UK government-backed scheme that is designed to help organisations protect themselves against the most common forms and methods of cyber-attack.

We also have a Data Protection Officer at MCPC, who is responsible for overseeing, ensuring and enforcing the protection of all personal information we process in the course of our business activities. Our Data Protection Officer is Charlotte Girow, Director of Business Development, who can be contacted by emailing charlotte.girow@mcpcsystems.co.uk or calling 01244 846450.

We are registered data controllers with the Information Commissioner's Office, which is the UK's supervising authority and whose website is www.ico.org.uk.

WHAT ARE YOUR DUTIES?

To help us ensure we protect your information, the information of other employees, workers or contractors at MCPC, and meet our obligations under GDPR, your duties and responsibilities are to:

- inform us of any changes that would affect the accuracy of the personal information we have about you (e.g. change of address), within a reasonable timeframe and without undue delay,
- observe and abide by all relevant policies and procedures we have in place concerning the protection of data and personal information at all times, and
- notify us in a timely manner where you suspect there may have been a breach of our obligations and/or standards for data protection – either under our internal policies, procedures, or under GDPR law itself.

WHAT ARE YOUR RIGHTS?

You have specific rights under GDPR regarding your personal information. These are:

- **The right to request access** to the personal information we process about you (also known as a 'subject access request').
- **The right to request correction** of the personal information that we hold about you. This also relates to your duties under this privacy notice, specifically in relation to informing us of changes to your personal information.
- **The right to request erasure** or **object to the processing** of your personal information, under certain circumstances where we have no overriding lawful basis for continuing to process your information.
- **The right to restrict processing** of your personal information – for example, if you want to suspend our processing of your information while you establish its accuracy of the lawful basis for our processing.
- **The right to request the transfer** of your personal information where we are lawfully obligated to do so.

You also have the right to make a complaint at any time to the Information Commissioner's Office if you believe we have not met our obligations for the processing of your personal information.

If you wish to employ any of these rights outlined above, you may do so by contacting the Data Protection Officer.

HOW CAN YOU GET IN TOUCH WITH US?

For all enquiries relating to our processing of your personal information, or this privacy notice, you can get in touch directly with our Data Protection Officer below.

Email: charlotte.girow@mcpcsystems.co.uk

Telephone: 01244 846450

Business address: MCPC Systems (UK) Ltd | The Annexe | Viscount House | River Lane | Saltney | Flintshire | CH4 8RH