

This notice explains what personal data (information) we hold about you, how we collect it, and how we will 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 and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

## **I. Who Collects the Information**

Bowlts Chartered Surveyors (the 'firm') is a 'controller' and gathers and uses certain information about you.

## **2. 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.

## **3. About the Information We Collect and Hold**

### **3.1 What Information**

We may collect the following information during your employment:-

- your name, contact details (i.e. address, home and mobile phone numbers, email address) and emergency contacts (i.e. name, relationship and home and mobile phone numbers);
- information collected during the recruitment process that we retain during your employment;
- employment contract information;
- details of salary and benefits, bank/building society, National Insurance and tax information, your age;
- details of your spouse/partner and any dependents;
- your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information;
- a copy of your driving licence;
- details of your pension arrangements, and all information included in these and necessary to implement and administer them;
- information in your sickness and absence records (including sensitive personal information regarding your physical and/or mental health);
- your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs;
- criminal records information, including the results of Disclosure and Barring Service (DBS) checks;
- information on grievances raised by or involving you;
- information on conduct and/or other disciplinary issues involving you;
- details/

- details of your appraisals and performance reviews;
- details of your performance management/improvement plans (if any);
- details of your time and attendance records;
- information regarding your work output;
- information in applications you make for other positions within our organisation;
- information about your use of our IT, communication and other systems, and other monitoring information;
- your image, in photographic and video form;
- details of your use of business-related social media, such as LinkedIn;
- your use of public social media (only in very limited circumstances, to check specific risks for specific functions within our organisation; you will be notified separately if this is to occur); and
- details in references about you that we give to others.

### **3.2 How We Collect the Information**

We may collect this information from you, your personnel records, the Home Office, pension administrators, your doctors, from medical and occupational health professionals we engage and from our insurance benefit administrators, other employees, consultants and other professionals we may engage. This is required for employment purposes, for example, to advise us generally and/or in relation to any grievance, conduct appraisal or performance review procedure, door entry, time management records, application logs, automated monitoring of our websites and other technical systems, such as our computer networks and connections, access control systems, communications systems, remote access systems, email and instant messaging systems, intranet and internet facilities, telephones, voicemail, mobile phone records and any other relevant systems.

### **3.3 Why We Collect the Information and How We Use It**

We will typically collect and use this information for the following purposes (other purposes that may also apply are explained in our GDPR Data Protection Policy):-

- for the performance of a contract with you, or to take steps to enter into a contract;
- for compliance with a legal obligation (for example, our obligations to you as your employer under employment protection and health and safety legislation, and under statutory codes of practice, such as those issued by ACAS); and
- for the purposes of our legitimate interests or those of a third party (such as a benefits provider), but only if these are not overridden by your interests, rights or freedoms.

You have the right to object to us using your personal information for the purposes of our legitimate interests by contacting Mandy McWilliam. If we agree and comply with your objection, this may affect our ability to administer and comply with the terms of your employment.

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Further information on the monitoring we undertake in the workplace and how we do this can be made available.

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

We are required to use your special categories of personal data relating to your health, racial or ethnic origin, etc, for health or social care purposes or for reasons of substantial public interest in relation to our rights and obligations under employment law or for health and social care purposes (for example, assessing the working capacity of employees). We may also use such information for the purposes of preventing or detecting criminal acts or fraud.

We also use your personal information relating to your age, marital status, gender, sexuality, ethnicity, religion, disability for equality monitoring purposes and to make reasonable adjustments as required by the Equality Act 2010.

We will process such special categories of or sensitive personal data to identify and keep under review the existence or absence of equality of opportunity or treatment between groups of people within the same categories to promote or maintain equality within the organisation.

#### **4. How We May Share the Information**

We may also need to share some of the above categories of personal information with other parties, such as external contractors and our professional advisers and with 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. Other parties that we may share your personal information with would also include pension administrators, healthcare insurance administrators and our accountants and HMRC.

We may also be required to share some personal information as required to comply with the law.

#### **5. How We Protect the Information**

We take the security of your personal information seriously and we have internal policies and procedures in place to try to ensure that your information is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.

Where we engage third parties to process personal information on our behalf, these suppliers may process personal information on our behalf as "processors" and are subject to written contractual conditions to only process that personal information under our instructions and protect it.

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In the event that we do share personal information with external third parties, we will only share such personal information strictly required for the specific purposes and take reasonable steps to ensure that recipients shall only process the disclosed personal information in accordance with those purposes.

## 6. **Where We Store the Information**

The personal information that we collect from you will usually be stored inside the UK or the European Union.

## 7. **Your Rights in Relation to the Information**

The accuracy of the information that we hold about you is important to us. If any of the information that we hold is inaccurate or out of date let us know using the contact details below.

You have certain rights in relation to your personal information under data protection legislation, including the right to:-

- request us to provide you with any personal information we hold about you; provision of such information will be subject to the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address);
- ask us to correct or complete the information that we hold about you if you believe that such information is inaccurate or incomplete;
- object to us using your personal information for specific purposes, for example, for marketing purposes;
- ask us to restrict using your personal information for specific purposes;
- request that we delete the personal information that we hold about you;
- obtain certain of the personal information that we hold about you for your own use; and
- know about any automated decision-making and profiling.

We will consider any requests we receive from employees in accordance with the terms of data protection legislation.

You may exercise any of the above rights by contacting Mandy McWilliam.

If you are not satisfied with our response to any complaint or believe our processing of your information does not comply with data protection legislation, you can make a complaint to the Information Commissioner's Office (ICO) at [www.ico.org.uk](http://www.ico.org.uk).

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## **8. How Long We Keep the Information**

We will only keep your personal information for as long as necessary to comply with our employment law obligations and to safeguard the firm in the event of any claims, complaints, litigation, enquiries or investigations during or following the termination of your employment. Information will be kept in line with statutory retention periods where defined and in line with recommendations for other cases.

CC/NH KB/53  
16<sup>th</sup> November 2023