



## PARRY AND EVANS LIMITED

### Data protection privacy notice (employment)

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

#### Who collects the information

Parry & Evans Ltd ('Company') is a 'data controller' and gathers and uses certain information about you. In this notice, references to 'we' or 'us' mean the Company and our group companies.

#### 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.

#### About the information we collect and hold

##### What information

We may collect the following information during your employment:

- Your name, contact details (ie address, home and mobile phone numbers, email address) and emergency contacts (ie 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 dependants;
- 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;
- Information on grievances raised by or involving you;

Severn Farm Industrial Estate, Welshpool, Powys, SY21 7DF Telephone: 01938 552 185  
Unit 103, Zone 1, Deeside Industrial Estate, Deeside, CH5 2LR Telephone: 01244 281 019

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- Information on conduct and/or other disciplinary issues involving you;
- 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;
- 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.

Some of the categories above may not apply to you if you are an agency worker or independent contractor.

#### **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, your trade union, other employees, consultants and other professionals we may engage, to advise us generally or in relation to any grievance, conduct appraisal or performance review procedure, clocking in system, time management system, automated monitoring of our websites and technical systems such as our computer networks and connections, CCTV and access control systems, communications systems, remote access systems, email and instant messaging systems, intranet and Internet facilities, telephones, voicemail, mobile phone records, firewalls, IMS management systems.

#### **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 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 (eg our obligations to you as your employer under employment protection and health 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.

Further information on the monitoring we undertake in the workplace and how we do this is available in our Data Protection Policy available from our HR department.

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.

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

### Where information may be held

Information may be held at our offices and those of our group companies, and third party agencies, service providers, representatives and agents as described above. Information may be transferred internationally and other countries around the world, including countries that do not have data protection laws equivalent to those in the UK, for the reasons described above. We have security measures in place to seek to ensure that there is appropriate security for information we hold including those measures detailed in our Data Protection Policy.

### How long we keep your information

We keep your information during and after your employment for no longer than is necessary for the purposes for which the personal information is processed. Further details on this are available in our Retention Policy.

Your rights to correct and access your information and to ask for it to be erased

Please contact HR Advisor based in the Deeside Depot who can be contacted via telephone on 01244 281 019 if (in accordance with applicable law) you would like to correct or request access to information that we hold relating to you or if you have any questions about this notice. You also have the right to ask our Hr Advisor for some but not all of the information we hold and process to be erased (the 'right to be forgotten') in certain circumstances. Our Hr Advisor will provide you with further information about the right to be forgotten, if you ask for it.

### Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

### How to complain

We hope that HR Advisor can resolve any query or concern you raise about our use of your information. If not, contact the Information Commissioner at [ico.org.uk/concerns/](https://ico.org.uk/concerns/) or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

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THE SCHEDULE  
 ABOUT THE INFORMATION WE COLLECT AND HOLD

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Your name, contact details (ie address, home and mobile phone numbers, email address) and emergency contacts (ie name, relationship and home and mobile phone numbers) **	From you	To enter into/perform the employment contract  Legitimate interest: to maintain employment records and good employment practice	To enter into/perform the employment contract
Details of salary and benefits, bank/building society, National Insurance and tax information, your age **	From you	To perform the employment contract including payment of salary and benefits  Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice	To ensure you receive the correct pay and benefits  Information shared with our payroll administrators and with HM Revenue & Customs (HMRC)
Details of your spouse/partner and any dependants **	From you	To perform the employment contract including employment-related benefits, e.g private medical insurance, life	To ensure you receive the correct pay and benefits  Information shared with our payroll administrators

		assurance and pension	and with HM Revenue & Customs (HMRC)
<b>Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information **</b>	From you and, where necessary, the Home Office	To enter into/perform the employment contract  To comply with our legal obligations  Legitimate interest: to maintain employment records	To carry out right to work checks  Information may be shared with the Home Office
<b>A copy of your driving licence **</b>	From you	To perform the employment contract  To comply with our driving legal obligations  To comply with the terms of our insurance	To ensure that you have a clean and valid driving licence  To ensure you have the correct licence for particular jobs  Information may be shared with our insurer
<b>Details of your pension arrangements, and all information included in these and necessary to implement and administer them **</b>	From you, from our pension administrators Royal London and (where necessary) from your own pension fund administrators	To perform the employment contract including employment-related benefits  To comply with our legal obligations  Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance	To administer your pension benefits and to comply with our auto-enrolment pension obligations  Information shared with our pension administrators Royal London and with HMRC

		obligations and good employment practice	
<b>Information in your sickness and absence records (including sensitive personal information regarding your physical or mental health) **</b>	From you, from your doctors, from medical and occupational health professionals	<p>To perform the employment contract including employment-related benefits</p> <p>To comply with our legal obligations</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice, to ensure safe working practices</p>	<p>To maintain employment records, to administer sick pay entitlement, to follow our policies and to facilitate employment-related health and sickness benefits</p> <p>To comply with our legal obligations to you as your employer</p> <p>Information shared with your doctors, with medical and occupational health professional</p> <p>For further information, see * below</p>
<b>Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs</b>	From you	To comply with our legal obligations and for reasons of substantial public interest	<p>To comply with our equal opportunities monitoring obligations and to follow our policies</p> <p>For further information, see * below</p>

<p><b>Information on grievances raised by or involving you</b></p>	<p>From you, from other employees and from consultants we may engage in relation to the grievance procedure</p>	<p>To perform the employment contract</p> <p>To comply with our legal obligations</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice</p>	<p>For staff administration, to follow our policies and to deal with grievance matters</p> <p>Information shared with relevant managers, HR personnel and with consultants we may engage</p>
<p><b>Information on conduct issues involving you</b></p>	<p>From you, from other employees and from consultants we may engage in relation to the conduct procedure</p>	<p>To comply with our legal obligations</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice, to ensure safe working practices</p>	<p>For staff administration and assessments, to follow our policies, to monitor staff performance and conduct and to deal with disciplinary and grievance matters</p> <p>Information shared with relevant managers, HR personnel and with consultants we may engage</p>
<p><b>Details of your appraisals and performance reviews</b></p>	<p>From you, from other employees and from consultants we may engage in relation to the appraisal/performance review process</p>	<p>To comply with our legal obligations</p> <p>Legitimate interests: to maintain employment records and to</p>	<p>For staff administration and assessments, to follow our policies, to monitor staff</p>

		comply with legal, regulatory and corporate governance obligations and good employment practice, to ensure safe working practices	performance and conduct and to deal with disciplinary and grievance matters  Information shared with relevant managers, HR personnel and with consultants we may engage
<b>Details of your performance management/improvement plans (if any)</b>	From you, from other employees and from consultants we may engage in relation to the performance review process	To comply with our legal obligations  Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice, to ensure safe working practices	For staff administration and assessments, to follow our policies and to monitor staff performance  Information shared with relevant managers, HR personnel and with consultants we may engage
<b>Details of your time and attendance records</b>	From you and from systems used eg clocking in system/time management system	To perform the employment contract  Legitimate interest: to monitor and manage staff access to our systems and facilities and to record staff absences	For payroll and staff administration and assessments, to follow our policies and to monitor staff performance and attendance  Information shared with relevant managers, HR personnel and



			with consultants we may engage and with our payroll administrators
<b>Information in applications you make for other positions within our organisation</b>	From you	<p>To enter into/perform the employment contract</p> <p>To comply with our legal obligations</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice</p>	<p>To process the application</p> <p>Information shared with relevant managers, HR personnel and with consultants we may engage</p>
<b>Information about your use of our IT, communication and other systems</b>	Automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, remote access systems, email and instant messaging systems, intranet and Internet facilities, telephones, voicemail, mobile phone records	<p>Legitimate interests: to monitor and manage staff access to our systems and facilities</p> <p>to protect our networks, and personal data of employees and customers/clients, against unauthorised access or data leakage</p> <p>to ensure our business policies, such as those concerning security</p>	<p>To protect and carry out our legitimate interests (see adjacent column)</p> <p>Information shared with relevant managers, HR personnel and with consultants we may engage</p> <p>For further information, see ** below</p>

		<p>and internet use, are adhered to</p> <p>for operational reasons, such as maintaining employment records, recording transactions, training and quality control</p> <p>to ensure that commercially sensitive information is kept confidential</p> <p>to check that restrictions on your activities that apply after your employment has ended (post-termination restrictions or restrictive covenants) are being complied with</p> <p>for security vetting and investigating complaints and allegations of criminal offences</p> <p>to prevent unauthorised access and modifications to our systems</p> <p>as part of investigations by regulatory bodies, or in connection with legal proceedings or requests</p>	
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<p>Details of your use of business-related social media, such as LinkedIn</p>	<p>From relevant websites and applications</p>	<p>Legitimate interests:</p> <ul style="list-style-type: none"> <li>to monitor and manage staff access to our systems and facilities</li> <li>to protect our networks, and personal data of employees and customers/clients, against unauthorised access or data leakage</li> <li>to ensure our business policies, such as those concerning security and internet use, are adhered to</li> <li>for operational reasons, such as maintaining employment records, recording transactions, training and quality control</li> <li>to ensure that commercially sensitive information is kept confidential</li> <li>to check that restrictions on your activities that apply after your employment has ended (post-termination restrictions or restrictive</li> </ul>	<p>To protect and carry out our legitimate interests (see adjacent column)</p> <p>Information shared with relevant managers, HR personnel and with consultants we may engage</p> <p>For further information, see ** below</p>
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		<p>covenants) are being complied with</p> <p>for security vetting and investigating complaints and allegations of criminal offences</p> <p>as part of investigations by regulatory bodies, or in connection with legal proceedings or requests</p>	
<p>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)</p>	<p>From relevant websites and applications</p>	<p>Legitimate interests:</p> <p>to monitor and manage staff access to our systems and facilities</p> <p>to protect our networks, and personal data of employees and customers/clients, against unauthorised access or data leakage</p> <p>to ensure our business policies, such as those concerning security and internet use, are adhered to</p> <p>for operational reasons, such as maintaining employment records, recording transactions, training and quality control</p>	<p>To protect and carry out our legitimate interests (see adjacent column)</p> <p>Information shared with relevant managers, HR personnel and with consultants we may engage</p> <p>For further information, see ** below</p>

		<p>to ensure that commercially sensitive information is kept confidential</p> <p>to check that restrictions on your activities that apply after your employment has ended (post-termination restrictions or restrictive covenants) are being complied with</p> <p>for security vetting and investigating complaints and allegations of criminal offences</p> <p>as part of investigations by regulatory bodies, or in connection with legal proceedings or requests</p>	
<p><b>Details in references about you that we give to others</b></p>	<p>From your personnel records, our other employees</p>	<p>To perform the employment contract</p> <p>To comply with our legal obligations</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and</p>	<p>To provide you with the relevant reference</p> <p>To comply with legal/regulatory obligations</p> <p>Information shared with relevant managers, HR personnel and the recipient(s) of the reference</p>



		good employment practice	
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You are required (by law or under the terms of your contract of employment, or in order to enter into your contract of employment) to provide the categories of information marked ‘\*\*’ above to us to enable us to verify your right to work and suitability for the position, to pay you, to provide you with your contractual benefits, such as and to administer statutory payments such as statutory sick pay (SSP). If you do not provide this information, we may not be able to employ you, to make these payments or provide these benefits.

\* Further details on how we handle sensitive personal information and information relating to criminal convictions and offences are set out in our Data Protection Policy as required under Data Protection Bill you are able to access this policy by contacting the HR department or available within the Company Handbook file at both depot’s canteens.

\*\* Further information on the monitoring we undertake in the workplace and how we do this is available in our Company Handbook available from the HR department or alternatively accessible in both Depot sites.

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