

Employee Privacy Notice

BACKGROUND:

Trinnovo Group understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our employees and will only collect and use personal data in ways that are described here, and in a way that is consistent with the Company's obligations and your rights under the law.

1. Data Protection Officers

Our nominated UK Data Protection Officer is Rabania Khan of Trinnovo Group. Email – gdpr@trinnovo.com

Our nominated EU Representative is Adam Brogden of Instant EU GDPR Representative Ltd. Email - contact@gdprlocal.com

2. What Does This Notice Cover?

This Privacy Information explains how Trinnovo Group uses your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that Trinnovo Group uses is set out in Part 5 below.

4. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about Trinnovo Group's collection and use of your personal data.
- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.

- c) The right to have your personal data rectified if any of your personal data held by the Company is inaccurate or incomplete.
- d) The right to be forgotten, i.e. the right to ask the Company to delete or otherwise dispose of any of your personal data that we have.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to the Company using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to the Company directly, and the Company is using the data with your consent or for the performance of a contract, and that data is processed using automated means, you can request a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. Part 6 explains more about how we use your personal data, including automated decision-making and profiling.

This Privacy Notice should tell you everything you need to know about the Company's use of your personal data and exercising your rights as outlined above. However, you can always contact us to find out more or to ask any questions using the details in Part 11.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

5. What Personal Data Do You Collect?

We may collect some or all of the following personal data (this may vary according to your relationship with Trinnovo Group):

We will collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
 - Date of birth.
 - Gender.
 - 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.
- Start date.

- Location of employment or workplace.
- Copy of your ID (passport, drivers license etc)
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process).
- Employment records (including job titles, work history, working hours, training records and professional memberships).
- Compensation history.
- Performance information.
- Disciplinary and grievance information.
- CCTV footage and other information obtained through electronic means such as swipecard records.
- Information about your use of our information and communications systems.
- Photographs.

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

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences.

6. How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. The legal bases we may rely on are inter alia that the processing of your data is necessary for performance of a contract with you, your consent to use your personal data, or because of our balanced legitimate business interests to use the data. Your personal data may be used for the following purposes:

- Making a decision about your recruitment or appointment.
- Determining the terms on which you work for us.
- Checking that you are legally entitled to work in the UK.
- Paying you and, if you are an employee, deducting tax and National Insurance contributions.
- Providing benefits to you.
- Liaising with your pension provider.
- Administering the contract we have entered into with you.
- Business management and planning, including accounting and auditing.

- Conducting performance reviews, managing performance and determining performance requirements.
- 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.
- 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.
- To prevent fraud.
- To monitor your use of our information and communication systems to ensure compliance with our IT policies.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
 - To conduct data analytics studies to review and better understand employee retention and attrition rates.
- Equal opportunities monitoring.

We will use your sensitive personal information in the following ways:

- to comply with employment and other laws we will use information relating to leaves of absence, which may include sickness absence or family related leave;
- to ensure your health and safety in the workplace, to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits, we will use information about your physical or mental health or disability status;
- to ensure meaningful equal opportunity monitoring and reporting, we will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation.

7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- Details on Bamboo HR (or other HR Information System) will be reviewed no sooner than six years after employment is terminated (as required by UK law).

8. How and Where Do You Store or Transfer My Personal Data?

Trinnovo Group may store or transfer some or all of your personal data in countries that are not part of the European Economic Area (the “EEA” consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as “third countries” and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that we will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR as follows.

Please contact us using the details below in Part 11 for further information about the particular data protection mechanism used by Trinnovo Group when transferring your personal data to a third country.

9. Do You Share My Personal Data?

We may share your personal data with other companies in our group where necessary.

We may sometimes contract with the following third parties to supply products and services to you on our behalf. These may include payment processing, delivery, and marketing. In some cases, those third parties may require access to some or all of your personal data that we hold.

If any of your personal data is required by a third party, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, the Company’s obligations, and the third party’s obligations under the law, as described above in Part 8.

If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR, as explained above in Part 8.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if the Company is involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

10. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can request details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ a fee may be charged to cover the administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, Trinnovo Group aims to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of the progress.

11. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Email address: gdpr@trinnovo.com

Telephone number: +44 020 3949 8187

Postal Address: 16 St John's Ln, London EC1M 4BS, United Kingdom

12. Changes to this Privacy Notice

Trinnovo Group may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available via Bamboo HR.

13. Complaints

If you are unhappy with the way in which your personal data has been collected, stored or processed please contact the Data Controller using the contact details above.

If you remain dissatisfied, then you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted by telephone on 0303 123 1113 or via their online notification system at www.ico.org.uk/concerns.

Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Version	Date	Description	Amended by	Approved by
1.0	01/02/2021	Notice created	Hayley Harkins	DJ Marker
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