

# Annington Management Limited

## Employee Fair Processing Notice

**Last updated:** June 2023

**Version:** 2

**Document owner:** Data Protection Lead

### 1. What is this document and why should you read it?

- 1.1 This privacy notice explains how and why Annington Management Limited (also referred to as "**Annington**", "**we**", "**our**" and "**us**") uses personal data about our employees, staff, contractors, trainees, officers, consultants, and temporary or agency workers (referred to as "**you**").
- 1.2 This notice does not form part of your contract of employment or any other contract to provide services.

### 2. Annington's data protection responsibilities

- 2.1 "**Personal data**" is any information that relates to an identifiable natural person. Your name, address, contact details, salary details and CV are all examples of your personal data, if they identify you.
- 2.2 The term "**process**" means any activity relating to personal data, including, by way of example, collection, storage, use, consultation and transmission.
- 2.3 Annington is a "**controller**" of your personal data. This is a legal term – it means that we make decisions about how and why we process your personal data and, because of this, we are responsible for making sure it is used in accordance with data protection laws.
- 2.4 You also have responsibilities whenever you process personal data in connection with the performance of your role at Annington; these are outlined in our [Data Protection Policy](#).

### 3. What types of personal data do we collect and where do we get it from?

- 3.1 We collect many different types of personal data about you for lots of reasons. We cannot administer our employment or other relationship with you without your personal data. Where we don't need your personal data, we will make this clear.
- 3.2 Further details of the personal data we collect, where we get it from and what we do with it are set out in the table below.
- 3.3 You provide us with personal data directly, and we also create some personal data ourselves and obtain some personal data from other sources. We obtain it from other people and organisations, including some public sources, such as publicly available directories and online resources, your emergency contacts, your use of Annington provided assets, systems and platforms, your line manager and co-workers, your dependents and beneficiaries, and third party benefits providers. You can read more about the sources of personal data in the more detailed information set out in the table below.
- 3.4 If any of the personal information you have given to us changes, such as your contact details, please inform us without delay via the HR Portal.

Type of personal data	Collected from
<b>a) Contact Information</b>	
<ul style="list-style-type: none"><li>Name(s)</li><li>Title</li><li>Address(es)</li><li>Email address(es)</li><li>Contact details including mobile telephone number(s)</li></ul>	<ul style="list-style-type: none"><li>You</li></ul>

<b>b) Personal Information</b>	
<ul style="list-style-type: none"> <li>Date of birth</li> <li>Gender</li> <li>Next of kin or other dependants</li> <li>Marital or relationship status</li> <li>Lifestyle and social circumstances</li> <li>Emergency contact information</li> </ul>	<ul style="list-style-type: none"> <li>You</li> </ul>
<b>c) Identity and Background Information</b>	
<ul style="list-style-type: none"> <li>Details of education and qualifications and results</li> <li>Career history, experience and skills</li> <li>Passport information</li> <li>Driving licence information</li> <li>Psychometric test results</li> <li>Right to work, residency and/or other visa information (where unrelated to your race or ethnicity)</li> <li>Curriculum Vitae (CV) or resume and professional profile</li> <li>Image or photographs</li> <li>Application form</li> <li>Evaluative notes and decisions from job interviews</li> <li>Preferences relating to job location and salary</li> <li>Conflicts of interests (including where related to family networks)</li> <li>Results of checks, references and test results (and any associated comments)</li> </ul>	<ul style="list-style-type: none"> <li>You</li> <li>Recruitment consultants and agencies</li> <li>Your previous employers</li> <li>Publicly available information from online resources</li> <li>Referees</li> <li>Test providers</li> <li>Providers of background checks and search results</li> </ul>
<b>d) Financial Information</b>	
<ul style="list-style-type: none"> <li>Bank account details</li> <li>Salary, compensation and other remuneration information</li> <li>National insurance number and/or other governmental identification numbers</li> <li>Business expense and reimbursement details</li> </ul>	<ul style="list-style-type: none"> <li>You</li> <li>Your previous employer</li> </ul>
<b>e) Special Category Personal Data</b>	
<ul style="list-style-type: none"> <li>Racial or ethnic origin (including your nationality and visa information)</li> <li>Political opinions</li> <li>Religious or philosophical beliefs</li> <li>Trade union membership</li> <li>Data concerning physical and/or mental health (including occupational health requirements, accident reports, day-to-day health concerns such as diabetes or epilepsy conditions which we should be aware of, dietary requirements, allergies, and reasons for any short term or long term absence)</li> <li>Sexual orientation</li> <li>Health and safety and accident records and reports</li> <li>Information relating to actual or suspected criminal convictions and offences</li> </ul>	<ul style="list-style-type: none"> <li>You</li> <li>Your emergency contact(s)</li> <li>Your use of Annington security control systems</li> </ul>
<b>f) Employment Administration Information</b>	
<ul style="list-style-type: none"> <li>Terms and conditions of employment</li> <li>Work related contact details (including location and office and corporate phone numbers)</li> <li>Image/photographs</li> <li>Holiday and other leave related records</li> <li>Your working preferences and feedback in relation to Annington and our staff</li> <li>Your preferences in relation to our use of your personal data</li> <li>Hours worked or working time preferences</li> <li>Statutory and non-statutory leave and absence records</li> </ul>	<ul style="list-style-type: none"> <li>You</li> </ul>
<b>g) Job Performance Information</b>	
<ul style="list-style-type: none"> <li>Role responsibilities</li> <li>Personal development reviews and appraisals, and associated feedback</li> <li>Training records</li> <li>Attendance information, including clocking in/out systems or timesheets</li> <li>Promotion application and/or outcome records</li> <li>Transfer and secondment information</li> </ul>	<ul style="list-style-type: none"> <li>You</li> <li>Your line manager(s) and co-workers</li> <li>Training providers</li> <li>Company to which transferred or seconded</li> </ul>
<b>h) Investigation, Grievance and Disciplinary</b>	
<ul style="list-style-type: none"> <li>Annington investigations records</li> <li>Grievance and disciplinary records</li> <li>Employment tribunal records</li> </ul>	<ul style="list-style-type: none"> <li>You</li> <li>Your line manager(s) and co-workers</li> <li>Third parties, as permitted by applicable law</li> </ul>
<b>i) Travel and Expenses Information</b>	
<ul style="list-style-type: none"> <li>Transaction records</li> <li>Visa, passport and insurance details</li> <li>Flight and accommodation booking information</li> <li>Travel itinerary information</li> </ul>	<ul style="list-style-type: none"> <li>You</li> <li>Your use of Annington payment cards</li> </ul>

**j) Benefits Information**

- Private healthcare, life assurance and pensions memberships for you and/or your dependants or other beneficiaries
- Death benefit information
- Season ticket loan records
- You
- Third party benefits providers
- Your dependents or other beneficiaries

**k) Asset, Systems and Platform Usage and Communications Information**

- Computer and phone records for work provided devices/equipment
- Access logs and usage records from document management systems and other
- Annington provided applications and technologies
- User IDs and password information
- IP addresses and other online and physical device identifiers
- Records of calls, messages and/or internet or other data traffic and communications
- You
- Us
- Our suppliers
- Your use of Annington assets, systems and platforms

**l) Security, Location and Access Information**

- Information captured or recorded by electronic card access systems, CCTV and other security control systems
- You
- Your use of Annington security control systems

**4. What do we do with your personal data, and why?**

4.1 We are required by law to always have a permitted reason or justification (called a “lawful basis”) for processing your personal data. The table below sets out the different purposes for which we process your personal data and the relevant lawful basis on which we rely for that processing.

4.2 Please note that where we have indicated in the table below that our processing of your personal data is either:

4.2.1 necessary for us to comply with a legal obligation; or

4.2.2 necessary for us to take steps, at your request, to potentially enter into an employment contract with you, or to perform it

and you choose not to provide the relevant personal data to us, we may not be able to enter into or continue our contract of employment or engagement with you.

4.3 We do not use your personal data for automated decision-making.

4.4 We may also convert your personal data into statistical or aggregated form to better protect your privacy, or so that you are not identified or identifiable from it. Anonymised data cannot be linked back to you. We may use it to conduct research and analysis, including to produce statistical research and reports. For example, to help us understand how many of our total workforce number are on secondments at any given time.

Lawful basis and purpose
<p><b>Consent</b></p> <p>Providing details of your employment to a new or potential employer, bank or financial institution where requested by you</p> <p>Providing financial references at your request</p> <p>Supporting our diversity programmes and staff support networks and initiatives (Note: special category personal data paragraph 5)</p> <p>Including images of you and/or testimonials from you in publications and online resources</p>
<p><b>Necessary to perform your employment contract</b></p> <p>Making a job offer to you and entering into a contract of employment with you</p> <p>Communicating with you and providing you with information in connection with your employment or engagement with us from time to time</p> <p>Paying your salary, compensation and any other benefits pursuant to your contract of employment and reimburse properly incurred expenses</p> <p>Compliance with obligations under the contract of employment between you and Annington</p>

Administering your travel and accommodation arrangements for business travel

**Necessary to comply with a legal obligation**

Complying with right to work compliance obligations

Calculating and administering taxation within payroll, and your entitlements to any statutory/contractual benefits (including statutory sick pay and workforce pension arrangements)

Managing our health and safety compliance obligations

Managing statutory holiday, maternity, paternity, adoption, parental and dependants leave and (where applicable) pay

Determining whether any adjustments are necessary to enable you to carry out your role (Note: special category personal data paragraph 5)

Monitoring the security of Annington's physical premises and systems, networks and applications

Identifying, investigating and mitigating suspected misuse of Annington's physical and information assets, and/or IT systems and platforms (Note: special category personal data paragraph 5)

Complying with equality and non-discrimination compliance obligations

Responding to binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities (Note: special category personal data paragraph 5)

Investigating, evaluating, demonstrating, monitoring, improving, reporting on and meeting Annington's compliance with relevant mandatory legal and regulatory requirements and compliance with binding governance responsibilities (Note: special category personal data paragraph 5)

Supporting the sale, transfer or merging of part or all of our business or assets, or in connection with the acquisition of another business (TUPE)

**Necessary for legitimate interests**

Administering your application for a job with us and considering your suitability for the relevant role

Promotion and succession planning

Conducting background checks, verification and vetting which are not required by law but needed by us to assess your suitability for your role (if for promotion or historic) (Note: special category personal data paragraph 5)

Communicating and liaising with you and providing you with information in connection with your employment or engagement with us from time to time

General staff administration, including workforce management and facilities operations

Managing annual leave entitlement and records, and to administer related payments

Administering our insurance policies (Note: special category personal data paragraph 5)

Carrying out performance reviews

Allocating and assigning responsibilities as necessary for workload management purposes, and measuring staff utilisation

Administering, recording and analysing training and training records

Supporting the establishment and maintenance of staff directories

Handling grievance and disciplinary matters, including investigating issues, considering appropriate resolution and mitigating actions and reviewing outcomes

Monitoring the security of Annington's physical premises and systems, networks and applications

Establishing a network of emergency contacts for individuals in case of emergency

Identifying, investigating and mitigating suspected misuse of Annington's assets, systems and platforms (Note: special category personal data paragraph 5)

Ensuring compliance with Annington policies and procedures (Note: special category personal data paragraph 5)

Implementing, adapting and enhancing systems and processes to develop or improve our business and/or make your job easier or more enjoyable

<p>Managing, planning and delivering our business, sales and marketing strategies</p> <p>Publishing external facing materials for marketing and public relations purposes such as where we mention you in the context of Annington projects and initiatives in our marketing materials, social media posts and press releases</p> <p>Administering your travel and accommodation arrangements</p> <p>Supporting the sale, transfer or merging of part or all of our business or assets, or in connection with the acquisition of another business</p> <p>Investigating, evaluating, demonstrating, monitoring, improving, reporting on and meeting Annington's compliance with relevant legal and regulatory requirements and compliance with best practice and good governance responsibilities (Note: special category personal data paragraph 5)</p> <p>Responding to employment and industrial relations matters where required by applicable law, including criminal investigations, grievances, arbitrations, negotiations, elections and strikes (where beyond mandatory) (Note: special category personal data paragraph 5)</p> <p>To obtain legal advice for enforcement and compliance</p> <p>Benchmarking, research and analysis</p> <p>Career management</p> <p>Identifying and authenticating employees and other individuals</p> <p>Supporting the sale, transfer or merging of part or all of our business or assets, or in connection with the acquisition of another business (non-TUPE)</p> <p>Insurance and claims</p> <p>Responding to requests or non-binding search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities and related parties (Note: special category personal data paragraph 5)</p> <p>Managing and administering our equal opportunities reporting (Note: special category personal data paragraph 5)</p>
<p><b>Necessary to protect vital interests</b></p> <p>Emergency use, so we can get you the help you need, deal with the emergency services</p> <p>Communicating with you and providing you with information in connection with your employment or engagement with us from time to time</p>

5. **Special category personal data (including criminal data)**

- 5.1 We are required by law to treat certain categories of personal data with even more care than usual.
- 5.2 These are called sensitive or special categories of personal data and different lawful bases apply to them. The table below sets out the different purposes for which we process your special category personal data and the relevant lawful basis on which we rely for that processing.

Lawful basis and purpose
<p><b>Explicit consent</b></p> <p>Conducting background checks, verification and vetting which are not required by law but needed by us to assess your suitability for your role</p> <p>Supporting our diversity programmes and staff support networks and initiatives</p>
<p><b>Necessary for your/our obligations and rights in the field of employment and social security and social protection law ("employment law obligations")</b></p> <p>Conducting verification and vetting, including criminal background checks and credit checks where required by law</p> <p>Facilitating the administration of any mandatory healthcare, life assurance/insurance, pensions initiatives and plans that we offer in connection with your employment with us</p> <p>Managing absence records, contractual sick leave entitlement and administering related payments</p> <p>Making reasonable adjustments as needed to help remove barriers faced by you in your role because of any disability you might have</p>

<p>Managing maternity, paternity, adoption, parental and dependants leave and (where applicable) pay</p> <p>Managing annual leave entitlement and records, and to administer related payments</p> <p>To review your right to work in the UK</p>
<p><b>It is necessary to protect the vital interests of the data subject or another person you or they are physically or legally incapable of giving consent ("vital interests")</b></p> <p>Contacting the appropriate person in the event of an emergency concerning you</p>
<p><b>It is necessary for our establishment, exercise or defence of legal claims ("legal claims")</b></p> <p>Identifying, investigating and mitigating suspected misuse of Annington's assets, systems and platforms</p> <p>Responding to binding and non-binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities or sharing information (on a voluntary basis) with the same</p> <p>Complying with disclosure orders arising in civil proceedings</p> <p>Investigating, evaluating, demonstrating, monitoring, improving and reporting on Annington's compliance with relevant legal and regulatory requirements</p> <p>Responding to employment and industrial relations matters where permitted by applicable law, including criminal investigations, grievances, arbitrations, negotiations, elections and strikes</p> <p>Administering our insurance policies</p> <p>Identifying and authenticating employees and other individuals</p>
<p><b>It is necessary for reasons of substantial public interest ("substantial public interest reasons")</b></p> <p>Conducting verification and vetting, including criminal background checks and credit checks where required by law</p> <p>Conducting background checks, verification and vetting which are not required by law but needed by us to assess your suitability for your role</p> <p>Managing and administering our equal opportunities reporting</p>
<p><b>It is necessary for preventive or occupational medicine, for the assessment of the working capacity of the employee ("preventative or occupational medicine")</b></p> <p>Delivering occupational health advice and services to you in relation to your role with us</p> <p>Facilitating the administration of any private healthcare, life assurance/insurance, pensions initiatives and plans that we offer in connection with your employment with us</p>

5.3 We have set out below the different lawful bases we rely on for each category of special category data.

Special categories of data	Lawful basis
Racial or ethnic origin	Explicit consent Employment law obligations Legal claims Substantial public interest reasons
Political opinions	Explicit consent Legal claims
Religious or philosophical beliefs	Explicit consent Employment law obligations Legal claims Substantial public interest reasons
Trade union membership	Legal claims Employment law obligations
Data concerning physical and/or mental health	Employment law obligations Vital interests Legal claims Substantial public interest reasons Preventive or occupational medicine
Sexual orientation	Explicit consent Employment law obligations Legal claims Substantial public interest reasons
Health and safety and accident records and reports	Employment law obligations

	Vital interests Substantial public interest reasons Legal claims Preventive or occupational medicine
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**6. Who do we share your personal data with, and why?**

6.1 Sometimes we need to disclose your personal data to other people.

*Inside the Annington group*

6.2 We are part of a group of companies. Therefore, we will need to share your personal data with other companies in the Annington group (for example, for shared services/division of functions) and our parent company group for key parental decision making and reporting purposes. Where any group companies process your personal data on our behalf (as our processor), we will make sure that steps are taken to protect the confidentiality, security and privacy of your personal data.

*Outside the Annington group*

6.3 From time to time we may ask third parties to carry out certain business functions for us, such as the administration of our payroll and our IT support. These third parties will process your personal data on our behalf (as our processor). We will disclose your personal data to these parties so that they can perform those functions. Before we disclose your personal data to other people, we will make sure that they have appropriate security standards in place to make sure your personal data is protected and we will enter into a written contract imposing appropriate security standards on them. Examples of these third party service providers include service providers and/or sub-contractors, such as our outsourced payroll, HR and marketing service providers, and our IT systems software and maintenance, back up, and server hosting providers.

6.4 In certain circumstances, we will also disclose your personal data to third parties who will receive it as controllers of your personal data in their own right for the purposes set out above in particular:

6.4.1 if we transfer, purchase, reorganise, merge or sell any part of our business or the business of a third party, and we disclose or transfer your personal data to the prospective seller, buyer or other third party involved in a business transfer, reorganisation or merger arrangement (and their advisors); and

6.4.2 if we need to disclose your personal data in order to comply with a legal obligation, to enforce a contract or to protect the rights, property or safety of our employees, customers or others.

6.5 We have set out below a list of the categories of recipients with whom we are likely to share your personal data:

6.5.1 banks, to make any payments to you, employment-related benefits providers and other third parties in connection with your benefits (such as pension trustees);

6.5.2 clients and suppliers;

6.5.3 consultants and professional advisors including legal advisors and accountants;

6.5.4 courts, court-appointed persons/entities, receivers and liquidators;

6.5.5 business partners and joint ventures;

6.5.6 trade associations and professional bodies;

6.5.7 insurers; and

6.5.8 governmental departments, statutory and regulatory bodies including the Department for Work & Pensions, Information Commissioner's Office, the police and Her Majesty's Revenue and Customs.

6.6 We may also share your personal data with third parties, as directed by you.

## 7. **Where in the world is your personal data transferred to?**

- 7.1 Annington is UK based and the majority of our processing of your personal data takes place within the UK. However, in some circumstances your personal data may be transferred to recipients outside the UK (for example, if we use a service provider that is not based in the UK).
- 7.2 Although data protection laws in some jurisdictions may not provide the same level of protection for your personal data as is provided under the laws in the United Kingdom, we will only transfer your personal data abroad as permitted by law. This includes allowing transfers:
- 7.2.1 to a country which is recognised as already ensuring an adequate level of protection for personal data;
  - 7.2.2 where appropriate safeguards are put in place with the recipient to protect your personal data, such by use of the official approved standard contractual clauses used for this purpose (called the International Data Transfer Agreement, or the UK Addendum) - please contact the Data Protection Lead if you wish to obtain a copy of these;
  - 7.2.3 where the transfer is necessary for a permitted reason specified in data protection law; or
  - 7.2.4 where you consent to the transfer.

## 8. **How long do we keep your personal data for?**

- 8.1 If you are our employee we will keep your personal data for various periods whilst you are employed by us and then, after your employment with us ends, for as long as is necessary in connection with both our and your legal rights and obligations. This may mean that we keep some types of personal data for longer than others.
- 8.2 We will only retain your personal data for a limited period of time. This will depend on a number of factors, including:
- 8.2.1 any laws or regulations that we are required to follow;
  - 8.2.2 whether we are in a legal or other type of dispute with each other or any third party;
  - 8.2.3 the type of information that we hold about you; and
  - 8.2.4 whether we are asked by you or a regulatory authority to keep your personal data for a valid reason.
- 8.3 To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure, the purposes for which we process your personal data, and any applicable laws or regulations.
- 8.4 We may in the future implement retention guidelines (and include a link to them here) which will set out further details about the period for which we keep records of your personal data. Please check back here from time to time if you would like to know more about retention.
- 8.5 Any personal data contained in any work related correspondence or records may be retained for longer, dependent on the retention period of the record or file that your personal data is held on.

## 9. **What are your rights in relation to your personal data and how can you exercise them?**

- 9.1 You have certain legal rights, which are briefly summarised in the table below, in relation to any personal data about you which we hold.
- 9.2 Where our processing of your personal data is based on your **consent**, you have the right to withdraw your consent at any time. If you do decide to withdraw your consent we will stop processing your personal data for that purpose, unless there is another lawful basis we can rely on – in which case, we will let you know. Your withdrawal of your consent won't impact any of our processing up to that point.
- 9.3 Where our processing of your personal data is necessary for our **legitimate interests**, you can object to this processing at any time. If you do this, we will need to show either a compelling reason why our



processing should continue, which overrides your interests, rights and freedoms or that the processing is necessary for us to establish, exercise or defend a legal claim.

Limitations and conditions of your right	Limitations and conditions of your right	Limitations and conditions of your right
<b>Right of access</b>	Subject to certain conditions, you are entitled to have access to your personal data (this is more commonly known as submitting a "data subject access request").	If possible, you should specify the type of information you would like to see to ensure that our disclosure is meeting your expectations. We must be able to verify your identity. Your request may not impact the rights and freedoms of other people, e.g. privacy and confidentiality rights of other staff.
<b>Right to data portability</b>	Subject to certain conditions, you are entitled to receive the personal data which you have provided to us and which is processed by us by automated means, in a structured, commonly-used machine readable format.	If you exercise this right, you should specify the type of information you would like to receive (and where we should send it) where possible to ensure that our disclosure is meeting your expectations. This right only applies if the processing is based on your consent or on our contract with you and when the processing is carried out by automated means (i.e. not for paper records). It covers only the personal data that has been provided to us by you.
<b>Rights in relation to inaccurate or incomplete personal data</b>	You may challenge the accuracy or completeness of your personal data and have it corrected or completed, as applicable. You have a responsibility to help us to keep your personal information accurate and up to date. We encourage you to notify us of any changes regarding your personal data as soon as they occur, including changes to your contact details, telephone number, immigration status.	Please always check first whether there are any available self-help tools to correct the personal data we process about you. This right only applies to your own personal data. When exercising this right, please be as specific as possible.
<b>Right to object to or restrict our data processing</b>	Subject to certain conditions, you have the right to object to or ask us to restrict the processing of your personal data.	This right applies where our processing of your personal data is necessary for our legitimate interests. If you do this, we will need to show either a compelling reason why our processing should continue, which overrides your interests, rights and freedoms or that the processing is necessary for us to establish, exercise or defend a legal claim. You can also object to our processing of your personal data for direct marketing purposes.
<b>Right to erasure</b>	Subject to certain conditions, you are entitled to have your personal data erased (also known as the "right to be forgotten"), e.g. where your personal data is no longer needed for the purposes it was collected for, or where the relevant processing is unlawful.	We may not be in a position to erase your personal data, if for example, we need it to (i) comply with a legal obligation, or (ii) exercise or defend legal claims.
<b>Right to withdrawal of consent</b>	Where our processing of your personal data is based on your consent you have the right to withdraw your consent at any time.	If you withdraw your consent, this will only take effect for future processing.

9.4 If you wish to exercise any of your rights please contact the Data Protection Lead in the first instance.

9.5 You also have the right to lodge a complaint with the Information Commissioner's Office, which is the UK data protection regulator. More information can be found on the Information Commissioner's Office website at <https://ico.org.uk/>.

10. **Updates to this notice**

We may update this notice from time to time to reflect changes to the type of personal data that we process and/or the way in which it is processed. We will update you on material changes to this notice by email. We also encourage you to check this notice on a regular basis.

11. **Where can you find out more?**

If you want more information about any of the subjects covered in this privacy notice or if you would like to discuss any issues or concerns with us, you can contact us in any of the following ways:

By email at: [Dataprotection@annington.co.uk](mailto:Dataprotection@annington.co.uk)

By telephone at: 020 7960 7500

By post at: The Data Protection Lead, 1 James Street, London, W1U 1DR