



## GDPR Privacy Notice

### Overview

Ambivent Facilities Management Limited (“we” or “us”) is committed to data protection and data privacy. We have undertaken a review on the way we handle data and the way in which we use it to provide our services and manage business operations.

We hold personal data on all our employees to meet legal obligations and to perform vital internal functions. This notice details the personal data we may retain, process and share with third parties relating to your employment and vital business operations. We are committed to ensuring that your information is secure, accurate and relevant. To prevent unauthorised access or disclosure, we have implemented suitable physical, electronic, and managerial procedures to safeguard and secure personal data we hold.

### Introduction

We have issued this notice to describe how we handle personal information that we hold about our staff and job applicants (collectively referred to as "you"). For the purposes of this notice, the term "employee" includes employees and those who work on a non-permanent basis, including temporary and contract workers, independent contractors, consultants, professional advisors, trainers, work experience/placement students and secondees.

We respect the privacy rights of individuals and are committed to handling personal information responsibly and in accordance with applicable law. This notice sets out the personal data that we collect and process about you, the purposes of the processing and the rights that you have in connection with it.

If you are in any doubt regarding this notice, please contact the Board of Directors.

### Types of personal data we collect

During your employment with us, or when making an application for employment, we may process personal data about you and your dependents, beneficiaries and other individuals whose personal data has been provided to us.

The types of personal information we may process include, but are not limited to:

- Identification data
- Contact details
- Employment details
- Background information
- Spouse & dependents information, marital status.
- Financial information.
- IT information.
- If you are a temporary employee, contract worker or consultant, the type of personal information we process is limited to that needed to manage your specific work assignment.
- References relating to previous roles and employment conduct may be undertaken prior to commencement of employment. We will only gather references from referees provided to us by the employee, or prospective employee.

Sensitive personal data ('special categories of personal data' under UK Data Protection legislation) includes any information that reveals your racial or ethnic origin, religious, political or philosophical beliefs, genetic data, biometric data for the purposes of unique identification, trade union membership, or information about your health/sex life. Generally, we try not to collect or process any sensitive personal information about you, unless authorised by law or where necessary to comply with applicable laws. In some circumstances, we may need to collect some sensitive personal information for legitimate employment-related purposes: for example:

- data relating to your racial/ethnic origin, gender and disabilities for the purposes of:
  - equal opportunities monitoring;
  - to comply with anti-discrimination laws; and
  - for government reporting obligations;
- data relating to your physical or mental health to:
  - provide work-related accommodations,
  - health and insurance benefits to you and your dependents; or
  - to manage absences from work.

## **Purposes for processing personal data**

### **Recruitment**

If you are applying for a role with us then we collect and use this personal data for recruitment purposes – in particular, to determine your suitability for a specific role. This includes assessing your skills, qualifications and verifying your information, carrying out reference checks and background checks (but only where necessary) and to generally manage the hiring process and communicate with you about it.

If you are accepted for a role with us, the data collected during the recruitment process will form part of your ongoing employee record.

### **Employment**

We collect and process personal data relating to our employees to meet our obligations under the employment contract and to comply with our legal obligations. We take the security of your data seriously and are committed to being transparent about how we collect and use that data and to meeting our data protection obligations.

Once you become an employee, we collect and use this personal information for managing our employment or working relationship with you – for example, your employment records and contract information (so we can manage our employment relationship with you), your bank account and salary details (so we can pay you), your equity grants (for benefits plan administration) and details of your spouse and dependents (for emergency contact and benefits purposes).

Where we process special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is done for the purposes of equal opportunities monitoring. Data that we use for these purposes is anonymised or is only collected with the express consent of employees, which can be withdrawn at any time.

We have policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed without authorisation and only accessed or used for specific legal purposes.

You have some obligations under your employment contract to provide the organisation with data. You may also have to provide the organisation with data in order to exercise your statutory rights,

such as in relation to statutory leave entitlements. Failing to provide this data may mean that you are unable to exercise your statutory rights.

We process our employees' personal information through a global human resources system ("HR System") Atlas, which is a tool that helps us to administer HR and employee compensation and benefits at an international level and which allows staff members to manage their own personal information in some cases. This is provided by Citation Limited who utilise third-party servers via Microsoft Azure to hold its HR System data and other business services; these are both based in the United Kingdom and have been assessed against stringent security requirements to ensure that all appropriate security controls are in place to protection personal information.

### **Legitimate business purposes**

We may also collect and use personal information when it is necessary for other legitimate purposes, such as to help us conduct our business more effectively and efficiently – for example, for general IT security management, accounting purposes or financial planning. We may also process your personal information to investigate violations of law or breaches of our own internal policies.

The IT Department will record and monitor usage of all our IT equipment, user activity, voice traffic, email and Internet usage as deemed necessary. The IT Department will observe the strictest confidentiality when undertaking these activities. They will make their report directly to the Board of Directors who will determine the actions that may need to be taken in any particular case.

Our site is protected by closed-circuit television (CCTV) systems throughout its premises as deemed necessary and employees should expect all areas (other than those where use would contravene common decency) to be visible on a television monitoring system. Any information obtained from systems will be used with strict adherence to the UK Data Protection legislation. Information will be used for the prevention and detection of crime and to ensure compliance with our policies and procedures and our legal obligations. This may include using recorded images as evidence in disciplinary proceedings.

### **Legal purposes**

We may also use your personal data where we consider it necessary for complying with laws and regulations, including collecting and disclosing employee personal information as required by law (e.g. for tax, health and safety, anti-discrimination laws), under judicial authorisation, or to exercise or defend our legal rights.

### **Legal basis for processing personal data**

Our legal basis for collecting and using the personal data described above will depend on the personal data concerned and the way we collect it. We will normally collect personal data from you only where we need it to perform a contract with you (i.e. to manage the employer/employee relationship), where we have your freely given consent to do so, or where the processing is in our legitimate interests and only where this interest is not overridden by your own interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person.

Any processing based on consent will be made clear to you at the time of collection or use – consent can be withdrawn at any time by contacting the Board of Directors.

### **Who we share your personal data with**

We take care to allow access to personal data only to those who require such access to perform their tasks and duties, and to third parties who have a legitimate purpose for accessing it. Whenever we permit a third party to access personal information, we will implement appropriate measures to ensure the data is used in a manner consistent with this notice and that the security and confidentiality of the data is maintained.

### **Transfers to third-party service providers**

In addition, we make certain personal data available to third parties who provide services to us. We do so on a "need to know basis" and in accordance with applicable data protection and data privacy laws.

For example, some personal data will be available to our employee benefit plans service providers and third-party companies who provide us with employment law advice, health and safety support, payroll support services, expenses, tax and travel management services.

Please see 'Annex A – Third party processors' at the end of this document for further detail of any third-party service provider and the information provided to them.

### **Transfers to other third parties**

We may also disclose personal data to third parties on other lawful grounds, including:

- To comply with our legal obligations, including where necessary to abide by law, regulation or contract, or to respond to a court order, administrative or judicial process
- In response to lawful requests by public authorities (including for national security or law enforcement purposes)
- As necessary to establish, exercise or defend against potential, threatened or actual litigation
- Where necessary to protect the vital interests of our employees or another person
- In connection with the sale, assignment or other transfer of all or part of our business; or
- With your freely given and explicit consent

### **Transfer of personal data abroad**

We may need to transfer personal data to countries outside of the United Kingdom. When we export your personal data to a different country, we will take steps to ensure that such data exports comply with applicable laws. For example, if we transfer personal data outside the European Economic Area (EEA) to a country without an EK or UK Adequacy Agreement, such as to the United States, we will implement an appropriate data export solution such as entering into contracts with the data importer that includes an International Data Transfer Addendum, and where necessary we will perform an International Transfer Risk Assessment.

### **Data retention**

Personal data will be stored in accordance with applicable laws and kept for as long as needed to carry out the purposes described in this notice or as otherwise required by law. Generally, this means your personal information will be retained until the end of your employment, employment application, or work relationship with us plus a reasonable period of time thereafter to respond to employment or work-related inquiries or to deal with any legal matters (e.g. judicial or disciplinary actions), document the proper termination of your employment or work relationship (e.g. to tax authorities), or to provide you with ongoing pensions or other benefits.

### **Your rights**

You may exercise the rights available to you under data protection law as follows:

- The right to be informed.
- The right of access.
- The right to rectification.
- The right to erasure.
- The right to restrict processing.
- The right to data portability.
- The right to object.
- Rights in relation to automated decision making and profiling.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. You can read more about these rights at:

<https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

To exercise any of these rights, please contact the Board of Directors.

### **Issues and complaints**

We try to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

This notice was drafted with clarity in mind. It does not provide exhaustive detail of all aspects of our collection and use of personal information. However, we are happy to provide any additional information or explanation needed.

If you want to make a complaint about the way we have processed your personal information, you can contact the Information Commissioner's Office in their capacity as the statutory body which oversees data protection law – [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns).

### **Updates to this notice**

This notice may be updated periodically to reflect any necessary changes in our privacy practices. In such cases, we will inform you on the intranet and, for significant changes, by company-wide email. We encourage you to check this notice periodically to be aware of the most recent version.

### **Contact details**

Please address any questions or requests relating to this notice to:

Steve Dudson – Chairman  
steve.dudson@ambivent-services.co.uk  
01604 969147

or write to:

Ambivent Facilities Management Ltd  
1 Moulton Court  
Anglia Way  
Moulton Park  
Northampton  
NN3 6JA