

# GDPR Fair Processing Notice - Employees

---

This notice explains what information we collect, when we collect it and how we use this. During the course of our activities, we will process personal data (which may be held on paper, electronically, or otherwise) about you and we recognise the need to treat it in an appropriate and lawful manner. The purpose of this notice is to make you aware of how we will handle your information.

## **Who are we?**

Pay4Property Ltd is a limited company, registered in England no. 09921333. We own and operate HMO residential properties in Worcester, UK.

Pay4Property Ltd take the issue of security and data protection very seriously and strictly adhere to guidelines published in the General Data Protection Regulation (EU) 2016/679 which is applicable from the 25th May 2018, together with any domestic laws subsequently enacted.

We are notified as a Data Controller with the Office of the Information Commissioner under registration number ZA104757 and we are the data controller of any personal data that you provide to us.

Our Data Protection Officer is Chris Baron, email : [chris@pay4property.com](mailto:chris@pay4property.com) , tel : 01684 878739

Any questions relating to this notice and our privacy practices should be sent to [chris@pay4property.com](mailto:chris@pay4property.com)

## **How we collect information from you**

We collect information about you:

- Directly from you.
- From an employment agency.
- From your previous employers and referees, either external or internal.
- From DBS and other security clearance providers.
- From Occupational Health and other health providers.
- From Payroll and Pension administrators and other government departments, for example tax details from HMRC. From providers of staff benefits.

- CCTV images from our own CCTV systems.

## **What personal data we process and why**

We process the following categories of personal data:

### **Information related to your employment**

We use the following information to carry out the contract we have with you, provide you access to business services required for your role and manage our human resources processes.

- Personal contact details such as your name, address, contact telephone numbers (landline and mobile) and personal email addresses.
- Your date of birth, gender and NI number.
- A copy of your passport or similar photographic identification and / or proof of address documents.
- Marital status.
- Next of kin, emergency contacts and their contact information.
- Employment and education history including your qualifications, job application, employment references, right to work information and details of any criminal convictions that you declare.
- Details of any secondary employment, political declarations, conflict of interest declarations or gift declarations. Security clearance details including basic DBS checks
- Your responses to staff surveys if this data is not anonymised.
- Information related to your salary, pension and loans We process this information for the payment of your salary, pension and other employment related benefits. We also process it for the administration of statutory and contractual leave entitlements such as holiday or maternity leave.
- Information about your job role and your employment contract including; your start and leave dates, salary, any changes to your employment contract, working pattern (including any requests for flexible working).
- Details of your time spent working and any overtime, expenses or other payments claimed, including details of any loans from us.
- Details of any leave including sick leave, holidays, special leave etc.
- Pension details including membership of both state and workplace pension schemes (current and previous).
- Your bank account details, payroll records and tax status information.
- Details relating to Maternity, Paternity, Shared Parental and Adoption leave and pay. This includes forms applying for the relevant leave any other relevant documentation relating to the nature of the leave you will be taking.

### **Information relating to your performance and training**

We use this information to assess your performance, to conduct pay reviews and to deal with any employer / employee related disputes. We also use it to meet the training and development needs required for your role.

- Information relating to your performance at work eg probation reviews, performance reviews, promotions.
- Grievance matters and investigations to which you may be a party or witness.
- Disciplinary records and documentation related to any investigations, hearings and warnings/penalties issued.
- Information related to your training history and development needs.

### **Information relating to monitoring**

We use this information to assess your compliance with corporate policies and procedures and to ensure the security of our premises, IT systems and employees.

- Information about your access to data held by us for the purposes of administering our business.
- Information derived from monitoring IT acceptable use standards.
- Photos and CCTV images.

### **Information relating to your health and wellbeing and other special category data**

We use the following information to comply with our legal obligations and for equal opportunities monitoring. We also use it to ensure the health, safety and wellbeing of our employees.

- Health and wellbeing information either declared by you or obtained from health checks, eye examinations, occupational health referrals and reports, sick leave forms, health management questionnaires or fit notes i.e. Statement of Fitness for Work from your GP or hospital.
- Accident records if you have an accident at work.
- Details of any desk audits, access needs or reasonable adjustments.
- Information you have provided regarding Protected Characteristics as defined by the Equality Act for the purpose of equal opportunities monitoring. This includes racial or ethnic origin, religious beliefs, disability status, and gender identification and may be extended to include other protected characteristics.

### **Why we need this information about you and how it will be used**

Depending on the processing activity, we rely on the following lawful basis for processing your personal data under the GDPR:

- Article 6(1)(b) which relates to processing necessary for the performance of a contract.
- Article 6(1)(c) so we can comply with our legal obligations as your employer.

- Article 6(1)(d) in order to protect your vital interests or those of another person.
- Article 6(1)(e) for the performance of our public task.
- Article 6(1)(f) for the purposes of our legitimate interest.

### **Special category data**

Where the information we process is special category data, for example your health data, the additional bases for processing that we rely on are:

- Article 9(2)(b) which relates to carrying out our obligations and exercising our rights in employment and the safeguarding of your fundamental rights.
- Article 9(2)(c) to protect your vital interests or those of another person where you are incapable of giving your consent.
- Article 9(2)(h) for the purposes of preventative or occupational medicine and assessing your working capacity as an employee.
- Article 9(2)(f) for the establishment, exercise or defense of legal claims.

In addition we rely on processing conditions at Schedule 1 part 1 paragraph 1 and Schedule 1 part 1 paragraph 2(2)(a) and (b) of the DPA 2018. These relate to the processing of special category data for employment purposes, preventative or occupational medicine and the assessment of your working capacity as an employee.

### **Criminal convictions and offences**

We process information about staff criminal convictions and offences. The lawful basis we rely to process this data are:

- Article 6(1)(e) for the performance of our duty of care to Tenants and other employees. In addition we rely on the processing condition at Schedule 1 part 2 paragraph 6(2)(a).
- Article 6(1)(b) for the performance of a contract. In addition we rely on the processing condition at Schedule 1 part 1 paragraph 1.

## **Processing and Sharing of Your Information**

The information you provide to us will be treated by us as confidential and will be processed only by us or an authorised third party, acting on our behalf. We may disclose your information to other third parties who act for us for the purposes set out in this notice or for purposes approved by you, including the following:

- To carry out due diligence on you as a prospective or current employee;
- For Payroll, Pension and Tax;
- HR records for legal, contractual, training and performance monitoring;

- and other purposes relating to our contract with you

Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.

### **Transfers outside the UK and Europe**

Most of your information will only be processed within the UK and EEA however we may transfer some of your information outside the UK and/or EEA.

Where information is transferred outside the UK or EEA, we ensure that there are adequate safeguards in place to protect your information in accordance with this notice, including the following:

- We use Google G Suite for email and online document storage. G Suite used geographically diverse data centres and may store emails and documents on servers located outside the EEA. G Suite is a commercial grade product (different to Gmail) which complies with ISO/IEC27018:2014 for security and complies with GDPR through EU model contract clauses

### **Security**

When you give us information we take steps to make sure that your personal information is kept secure and safe.

- Paper documentation is held in a private office only accessible by the two company directors
- Local electronic documents are held on a password protected computer system
- Archived emails are removed from Google servers and stored locally on a password protected computer system
- Data backups are encrypted

### **How long we will keep your information**

We review our data retention periods regularly and will only hold your personal data for as long as is necessary for the relevant activity, or as required by law (we are legally required to hold some types of information for 7 to 10 years), or as set out in any relevant contract we have with you.

## **Your Rights**

You have the right at any time to:

- ask for a copy of the information about you held by us in our records;
- require us to correct any inaccuracies in your information;
- make a request to us to delete what personal data of yours we hold; and

If you would like to exercise any of your rights above please contact us at [chris@pay4property.com](mailto:chris@pay4property.com)

Should you wish to complain about our use of your information, we would ask that you contact us to resolve this matter in the first instance. You also have the right to complain to the Information Commissioner's Office in relation to our use of your information. The Information Commissioner's contact details are noted below:

Information Commissioner's Office

Wycliffe House, Water Lane

Wilmslow, Cheshire, SK9 5AF

Telephone: 0303 123 1113

Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

The accuracy of your information is important to us - please help us keep our records updated by informing us of any changes to your details.

Pay4Property Ltd is a limited company, registered in England no. 09921333. Our registered address is Redlands, Quarry Park Road, Stourbridge, DY8 2RE.