

# Hear Together: Privacy Notice

---

**Data Controller: Hear Together**

**Data Protection Officer: Sarah Allen**

## **Overview**

Hear Together (the 'Company') collects and processes personal information or personal data, relating to its employees to manage the employment relationship. This personal information may be held by the Company on paper or in electronic format. The Company is committed to being transparent about how it handles your personal information, to protecting the privacy and security of your information and to meeting its data protection obligations under the General Data Protection Regulations ("GDPR").

## **What information does the Company collect?**

Personal information is any information about an individual from which that person can be directly or indirectly identified. This can include:

- your name, address and contact details, including email address and telephone number, date of birth and gender;
- the terms and conditions of your employment, including job title and working hours, as set out in the offer letter, employment contracts, written statement of terms and conditions, casual worker agreements, consultancy agreements, pay review and bonus letters, statements of changes to employment or engagement terms and related correspondence;
- recruitment records, including personal information included on a CV, any application form, cover letter, interview notes, references, copies of proof or right to work in the UK documentation, copies of qualification certificates, copy of driving licence and other background check documentation;
- details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with the Company;
- information about your remuneration, including entitlement to benefits such as pensions or insurance cover;
- details of your bank account and national insurance number, payroll records, tax code and tax status information;
- information about your marital status, next of kin, dependants and emergency contacts;
- information about your criminal record;
- details of your schedule (days of work and working hours) and attendance at work;

- annual leave and other leave records, including details of the types or and reasons for leave being taken and related correspondence;
- details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence;
- any termination of employment or engagement documentation, including resignation letters, dismissal letters, redundancy letters, minutes of meetings, settlement agreements and related correspondence;
- information obtained through electronic means such as a swipecard or closing in card records;
- information about your use of our IT systems, including usage of telephones, e-mail and the internet;
- photographs, such as ID cards;
- assessments of your performance, including appraisals, performance reviews and ratings, training you have participated in, performance improvement plans and related correspondence;
- information about medical or health conditions, including whether or not you have a disability for which the Company needs to make reasonable adjustments;
- details of trade union membership; and
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.

### **How do we collect your personal information?**

The Company may collect personal information about its employees, workers and contractors in a variety of ways. It is collected through the recruitment process or directly from you. We may also collect personal information from other external third parties, such as references from former employers, information from background check providers, information from credit reference agencies and criminal record checks from the Disclosure and Barring Service.

Your information will also be collected throughout the period of your employment with us. Your information may be stored in different places, including your personnel file, in our Company's HR management system and in other IT systems, such as the e-mail system.

### **Why and how we use your personal information?**

We will use your personal information in one or more of the following circumstances:

- where we need to do so to perform the employment contract, casual worker agreement, consultancy agreement or contract for services we have entered into with you;
- maintain accurate and up-to-date employment records and contact details (including emergency contact details), and records of employee contractual & statutory rights;

- operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace;
- ensure employees are complying with relevant policies and procedures;
- operate and keep a record of employee performance and related processes, to plan for career development, and for succession planning and workforce management purposes;
- operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled;
- obtain occupational health advice, to ensure that it complies with duties in relation to individuals with disabilities, meet its obligations under health and safety law, and ensure that employees are receiving the pay or other benefits to which they are entitled;
- operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to allow effective workforce management, to ensure that the organisation complies with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled;
- ensure effective general HR and business administration;
- conduct employee engagement surveys;
- provide references on request for current or former employees;
- respond to and defend against legal claims; and
- maintain and promote equality in the workplace.

Please note that we may process your personal information without your consent, in compliance with these rules and where this is required or permitted by law.

### **Who has access to data?**

Your information may be shared within the Company, including with members of the HR team, payroll staff, your line manager, managers in the business area in which you work and IT staff if access to the data is necessary for performance of their roles.

Your data may also be shared with third parties in order to obtain pre-employment references from other employers, obtain employment background checks from third-party providers and obtain necessary criminal records checks from the Disclosure and Barring Service, payroll providers, benefits providers, external IT services, professional advisors, such as HR, lawyers and accountants.

## **How does the Company protect your personal information?**

The Company has put in place measures to protect the security of your personal information and has internal controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.

Where your personal information is shared with third party services providers, we require all third parties to take appropriate security measures to protect your personal information and to treat it subject to a duty of confidentiality and in accordance with data protection law.

## **For how long does the Company keep your personal data?**

The Company will generally hold your personal data for the duration of your employment.

Once you have left employment or your employment has been terminated, we will generally hold your personal information for a year after termination of your employment, but this is subject to

- any minimum statutory or other legal, tax, health and safety, reporting or accounting requirements for particular data or records; and
- the retention of some types of personal information for up to 6 years to protect against legal risk, eg if they could be relevant to a possible legal claim in a tribunal, a county court or the High Court.

We will hold payroll, wage and tax records (including salary, bonuses, overtime, expenses, benefits and pension information, National Insurance number, PAYE records, tax code and tax status information for 6 years after the termination of your employment. We will, however “thin” your file of personal information that we hold on you 1 year after termination and will only continue to retain for a longer period what is strictly necessary. =

## **Your rights**

It is important that the personal information we hold about you is accurate and up to date. Please keep us informed if your personal information changes, eg you change your home address, so that our records can be updated. The Company cannot be held responsible for any errors in your information in this regard unless you have notified us of the relevant change.

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the Company to change incorrect or incomplete data;
- require the Company to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;

- object to the processing of your data where the Company is relying on its legitimate interests as the legal ground for processing; and
- ask the Company to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the Company's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact your data controller. If you believe that the Company has not complied with your data protection rights, you can complain to the Information Commissioner's office at any time.

### **What if you do not provide personal data?**

You have some obligations under your employment contract to provide the Company with data. In particular, you are required to report absences from work and may be required to provide information about disciplinary or other matters under the implied duty of good faith. You may also have to provide the Company with data in order to exercise your statutory rights, such as in relation to statutory leave entitlements. Failing to provide the data may mean that you are unable to exercise your statutory rights.

Certain information, such as contact details, your right to work in the UK and payment details, have to be provided to enable the Company to enter a contract of employment with you. If you do not provide other information, this will hinder the Company's ability to administer the rights and obligations arising as a result of the employment relationship efficiently

### **Transferring personal data outside the European Economic Area**

The Company will not transfer your personal information to countries outside of the European Economic Area.

### **Changes to this privacy notice**

The Company reserves the right to update or amend this privacy notice at any time, including where the Company intends to further process your personal information for a purpose other than for which the personal information was collected or where we intend to process new types of personal information. We will issue you with a new privacy notice when we make significant updates or amendments. We may also notify you about the process of your personal information in other ways.

### **Approval and Review**

<b>Policy Owner</b>	<b>Sarah Allen</b>
<b>Effective date</b>	<b>November 2023</b>
<b>Review date</b>	<b>November 2024</b>