



# Employee Privacy Notice

## Shorefield Holidays Ltd

Version 1.1 (18<sup>th</sup> May 2021)

### INTRODUCTION

Welcome to our privacy notice for current and former employees, workers and contractors.

We respect your privacy and are committed to protecting your personal information, which we call "personal data". This privacy notice will tell you how we look after your personal data and about your privacy rights.

This notice does not form part of any contract. It supplements any other notices and is not intended to override them.

We have tried to be brief and clear. We are happy to provide any additional information or explanation.

### WHO WE ARE

|   |   |
|---|---|
| <b>Data Controller (Park Owner)</b><br>(referred to as "we/us/our") | <b>Shorefield Holidays Limited</b>                                  |
| <b>Name or title of Data Protection Manager:</b>                    | <b>Andrew Bowden, Director / ICT Manager</b>                        |
| <b>Address:</b>   | <b>Shorefield Rd, Milford-on-Sea, Lymington, Hampshire SO41 0LH</b> |
| <b>Telephone:</b>   | <b>01590 648300</b>   |
| <b>Email:</b>   | <b>yourdata@shorefield.co.uk</b>                                    |

## CHANGES

This version was last updated on 18<sup>th</sup> May 2021 and historic versions can be obtained by contacting us at the email address above.

It is important that the personal data we hold about you is accurate and current. Please keep us informed of any changes.

## HOW WE COLLECT YOUR PERSONAL DATA

We collect personal data through application and recruitment processes, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties. (see below)

We may also receive personal data about you from third parties and public sources, including:

| Who                                 | When  |
|-------------------------------------|---|
| Former employers and other referees | We may ask you for permission to take a reference from former employers and other referees as a condition of a contract or offer to you.                                    |
| Credit reference agencies           | We may make a credit reference check on our contractors.  |
| Disclosure & Barring Service (DBS)  | We may require you to apply for a DBS check. We do this for certain positions within the Company, and for employees supplied with accommodated by the Company on our parks. |

We will collect additional personal information in the course of job-related activities throughout the period of you working for us.

## WHAT PERSONAL DATA DO WE COLLECT?

| Personal Data  | Yes | No |
|--|-----|----|
| Personal contact details such as name, title, addresses, telephone numbers and | ✓   |    |

|  |            |           |
|--|------------|-----------|
| personal email addresses   |            |           |
| Date of birth  | ✓          |           |
| Gender   | ✓          |           |
| Marital status   | ✓          |           |
| Next of kin and emergency contact information  | ✓          |           |
| National Insurance Number  | ✓          |           |
| Bank account details, payroll records and tax status information   | ✓          |           |
| Pay, holiday and benefits information  | ✓          |           |
| Start date   | ✓          |           |
| Location of employment or workplace  | ✓          |           |
| Copy of driving licence  | ✓          |           |
| 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, training records and professional memberships   | ✓          |           |
| History of pay and benefits received   | ✓          |           |
| Performance information  | ✓          |           |
| Disciplinary and grievance information   | ✓          |           |
| CCTV footage and other information obtained through electronic means such as swipe-card records, where used  | ✓          |           |
| Information about your use of our information and communication systems  | ✓          |           |
| Photographs  | ✓          |           |
| Automatic Number Plate Recognition   | ✓          |           |
| Employee Leisure Membership card swipes for discounts in our facilities  | ✓          |           |
| <b>SENSITIVE PERSONAL DATA</b>   | <b>Yes</b> | <b>No</b> |
| <b>We may also collect, store and use the following categories of more</b>   |            |           |

|  |   |   |
|--|---|---|
| <b>sensitive personal information</b>  |   |   |
| Information about your race or ethnicity   | ✓ |   |
| Trade union membership   |   | ✓ |
| Information about your health, including any medical condition, health and sickness records  | ✓ |   |
| Genetic information and biometric data, such as drug test results  | ✓ |   |
| Information about criminal convictions and offences. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of you working for us<br><br><i>The link below explains when a criminal record check may be made with the Disclosure and Barring Service</i><br><br><a href="https://www.gov.uk/guidance/dbs-check-requests-guidance-for-employers">https://www.gov.uk/guidance/dbs-check-requests-guidance-for-employers</a> .<br><br>This is not possible in most cases. | ✓ |   |

## HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. In each case we may rely on three reasons to do so. These are:

- (a) The performance of a contract with you.
- (b) Because it is necessary to comply with a legal obligation.
- (c) Because it is necessary for our legitimate interests.

These three reasons for using your personal data overlap and there may more than one ground to justify our use of your personal information on any occasion.

| <b>Purpose/Activity</b>                                 | <b>Lawful basis for processing (see above)</b> | <b>Basis of legitimate interest, where applicable</b>  |
|---|--|--|
| Making a decision about your appointment or recruitment | a, b & c                                       | To appoint and retain people who are able to help us develop and grow our business. To treat you fairly. |
| Deciding the terms on which you work for us             | a, b & c                                       | To appoint and retain people who are able to help  |

|   |          |   |
|---|----------|---|
|   |          | us develop and grow our business. To treat you fairly.  |
| Checking you are legally entitled to work in the UK                                 | a, b & c | To appoint and retain people who are legally entitled to work in the UK.  |
| Paying you and deducting any tax or national insurance due                          | a, b & c | To comply with the law.   |
| Administering our contract  | a, b & c | To retain people who are able to help us develop and grow our business. To treat you fairly. To ensure that you meet your obligations to us and that we are able to address any situation in which you do not.                                  |
| Business management and planning including accounting and auditing                  | c        | To help us develop and grow our business.   |
| Managing performance including carrying out performance reviews and setting targets | a, b & c | To retain people who are able to help us develop and grow our business, To treat you fairly. To ensure that you meet your obligations to us and that we are able to address any situation in which you do not.                                  |
| Making decisions about pay reviews and other benefits.                              | a, b & c | To retain people who are able to help us develop and grow our business. To treat you fairly.  |
| Assessing qualifications for a job or task including decisions about promotion      | a, b & c | To appoint and retain people who are able to help us develop and grow our business. To treat you fairly.  |
| Gathering evidence for possible grievance or disciplinary hearings                  | a, b & c | To retain people who are able to help us develop and grow our business. To treat you fairly. To ensure that you and your work colleagues meet your obligations to us and that we are able to address any situation in which you or they do not. |
| Making decisions about your continued employment or engagement                      | a, b & c | To ensure that we retain people who are able to help us develop and grow our business. To treat you fairly. To ensure that you  |

|   |          |  |
|---|----------|--|
|   |          | meet your obligations to us and that we are able to address any situation in which you do not.   |
| Education, training and development requirements  | a, b & c | To ensure that we equip you to help us develop and grow our business.  |
| Dealing with legal disputes involving you or others connected to our business, including accidents at work  | b & c    | To protect our legitimate interests and those of others in legal disputes.   |
| Ascertaining your fitness to work   | a, b & c | To appoint and retain people who are able to help us develop and grow our business. To treat you fairly. To ensure that you meet your obligations to us and that we are able to address any situation in which you do not. |
| Managing sickness absence   | a, b & c | To appoint and retain people who are able to help us develop and grow our business. To treat you fairly. To ensure that you meet your obligations to us and that we are able to address any situation in which you do not. |
| Complying with health and safety obligations  | a, b & c | To keep you and your colleagues healthy and safe at work.  |
| To prevent fraud  | a, b & c | To prevent fraud and to take appropriate action if it takes place, including action against anyone responsible.  |
| To monitor your use of our information and communication systems to ensure compliance with our IT policies  | a, b & c | To ensure that you meet your obligations to us and that we are able to address any situation in which you do not. To ensure that we comply with the law.   |
| To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution | a, b & c | To keep out network and information secure and to take appropriate action if it is breached, including action against anyone responsible.  |
| To conduct data analytics studies to review and better understand employee retention  | c        | To retain people who are able to help us develop and grow our business.  |

|  |          |   |
|--|----------|---|
| and attrition rates  |          |   |
| Equal employee monitoring                                  | a, b & c | To ensure meaningful equal opportunity monitoring and reporting.  |
| Providing the benefits to employees which are listed below | a, b & c | To appoint and retain people who are able to help us develop and grow our business. To meet our obligations to you. |

|                   |   |
|-------------------|---|
| Relevant benefits | <ol style="list-style-type: none"> <li>1. To give you information about our pension scheme and to administer your membership if you join.</li> <li>2. To give you information about, and to administer discounts you may receive when using our facilities.</li> <li>3. To give you information about, and to administer your membership of Company benefit schemes, such as Medicash and Qarrot, if you join.</li> <li>4. To give you information about your membership of our bar and leisure complexes, and to administer your membership</li> </ol> |
|-------------------|---|

## HOW WE USE YOUR SENSITIVE PERSONAL DATA

| <b>Sensitive personal data</b>  | <b>Lawful basis for processing</b> | <b>Any other basis of legitimate interest, where applicable</b>   |
|---|------------------------------------|---|
| Information relating to absence, which may include sickness absence or family related leave | a, b & c                           | To comply with employment or other laws. To ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits. |
| Information about your physical or mental health or disability                              | a, b & c                           | To ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits   |
| Information about your race or ethnicity  | a, b & c                           | To ensure meaningful equal opportunity monitoring and reporting.  |
| Information about criminal convictions and offences   | a, b & c                           | To help us make a fair decision about your appointment or recruitment or about your continued employment or   |

|  |  |   |
|--|--|---|
|  |  | <p>engagement, where the information is relevant.</p> <p>Where it is necessary in relation to legal claims.</p> <p>Where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.</p> |
|--|--|---|

We do not need your consent to use your sensitive personal data in these ways. However, in limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

### **CHANGE OF PURPOSE**

Please note that we may process your personal data without your knowledge or consent where this is required or permitted by law.

However, if we need to use your personal data for a new purpose and the law allows us to do so, we will notify you and explain the legal basis for our actions.

### **IF YOU FAIL TO PROVIDE PERSONAL DATA**

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

### **DISCLOSURES OF YOUR PERSONAL DATA**

We may share your personal data with third parties to help us run our business or carry out our obligations to you:



| Name   | Lawful basis for processing including basis of legitimate interest   | Names of third parties, where relevant  |
|--|--|---|
| Service providers for<br>IT and system administration<br>Payroll<br>Pension<br>Other employment benefits | Performance of a contract with you<br><br>Necessary for our legitimate interests (performing the contract, using your data as we have described in this notice). | <ul style="list-style-type: none"> <li>• CIPHR (HR &amp; Payroll software providers)</li> <li>• Standard Life (pension provider)</li> <li>• Mediacash (Healthcare cash plan provider)</li> <li>• Qarrot (employee engagement app provider)</li> </ul> |
| Our professional advisers including lawyers, bankers, auditors and insurers.                             | Necessary for our legitimate interests (complying with our legal obligations, helping us develop and grow our business).   | <ul style="list-style-type: none"> <li>• HSBC (bank)</li> <li>• NFU (insurers)</li> <li>• Francis Clark Princecroft Willis (auditors)</li> <li>• McMillan Williams Solicitors Ltd (Solicitors)</li> </ul>   |
| HM Revenue & Customs, regulators and other authorities   | Necessary for our legitimate interests (complying with our legal obligations).   | Where required  |

We may also share your personal data with any third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **INTERNATIONAL TRANSFERS**

We do not transfer your data outside the European Economic Area.

### **AUTOMATED DECISION MAKING**

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We do not envisage that any decisions will be taken about you using automated means. We will notify you in writing if this position changes.

## **DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **HOW LONG WILL WE USE YOUR PERSONAL DATA FOR?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

You can ask us about the retention periods for different aspects of your personal data by contacting our Data Protection Manager.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **YOUR LEGAL RIGHTS**

You have the right to:

**Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

**No fee usually required** You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

**We may need to request specific information from you** to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

**We try to respond to all legitimate requests within one month.** Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

**You have the right to make a complaint at any time to the Information Commissioner's Office (ICO)** ([www.ico.org.uk](http://www.ico.org.uk)). We would appreciate the chance to deal with your concerns first.