

EMPLOYEE PRIVACY NOTICE



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1 Introduction

The Odevo Group, of which Rendall & Rittner Limited is a member is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with Data Protection Legislation.

This privacy notice applies to all Odevo Group employees, workers and contractors, whether full or part-time, temporary or permanent. We are the data controller for all personal data processed for employment purposes, unless stated otherwise. This notice does not form part of any contract of employment or other contract to provide services.

A full list of the Odevo Group companies subject to this Employee Privacy Notice are listed at the end of the document. For simplicity, throughout this notice, 'we' and 'us' means the any member of the Odevo Group as may be applicable to your use of the relevant website.

It is important that you read and retain this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information and what your rights are under the Data Protection Legislation.

Data Protection Legislation means the Data Protection Act 2018 which incorporates the General Data Protection Regulation (GDPR), the Privacy and Electronic Communications (EC Directive) Regulations 2003 and any legislation implemented in connection with the General Data Protection Regulation which is the governing legislation that regulates data protection across the EEA. This includes any replacement legislation coming into effect from time to time.

2 Data Protection Principles

We will comply with the relevant Data Protection Legislation, which says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

3 The Type of information we hold about you

Personal information means any information about an individual from which that person can be identified. It does not include information where the identity has been removed (anonymous information).

We will collect, store and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses;
- Photographs;
- Date of birth;
- Gender;
- Marital status and dependants;
- Driving licence details;
- Next of Kin and emergency contact information; copy of driving licence,
- Utility bills or other information used for due diligence purposes to meet Financial regulation requirements;
- Employment records, including job titles, work history, working hours, holidays, training records and professional memberships;
- Details of your qualifications, skills, experience
- Credit Reference Agency checks, Criminal Conviction Records and similar due diligence checks;
- Salary, expenses, benefits and pension details;
- Bank details and information in relation to your tax status including your national insurance number;
- Your identification documents in relation to your right to work status, including passport or resident's permit;
- Recruitment information such as your application form, CV, references, qualifications and details for any preemployment assessments;
- Information relating to your entitlement to work in the UK;
- Information about your contract of employment (or services) including start and end date of employment, role, salary, pension, benefits and holiday entitlement, details of promotion;
- Assessments of your performance, including appraisals, performance reviews and ratings, training you have participated in, performance improvement plans and related correspondence;
- Personal data generated throughout your working activities, for example phone call recordings when using company issued devices, usage of IT equipment (including access logs, communication sent and received, internet browsing and data or documentation created by you) and swipe card and access logs relating to buildings and offices;
- Equal opportunities monitoring information, including information about your ethnic origin, sexual orientation and religion or belief;
- Nationality;

- Any other category of personal information which we may notify you of from time to time;
- Application for a new role or position;
- Physical access and egress information;
- Personal information generated throughout your working activities, for example phone call recordings when using company issued devices, usage of IT equipment (including access logs, communication sent and received, internet browsing and data or documentation created by you) and swipe card and access logs relating to buildings and offices;
- CCTV footage of you in Rendall & Rittner Financial property;
- Correspondence with you;
- forms completed by you at the start of or during employment (such as benefit nomination forms).

We may also collect, store and use “special categories” of more sensitive personal information which require a higher level of protection (see section 7 below).

4 How is your personal information collected?

We collect personal information about employees, workers and contractors:

- Through the application and recruitment process including application forms, CV's and interviews;
- Directly from candidates;
- Your passport or other identity documents such as your driving licence
- Forms completed by you at the start of or during employment (such as benefit nomination forms)
- Directly from employees from time to time;
- Correspondence with you
- From external third parties, including: employment agencies, previous employers, the trustees or managers of pension arrangements operated by us, credit reference agencies and HMRC;
- From internal systems and access logs;
- From your use of the company email system, i.e., where we store emails;
- From your use of other business systems.

We may collect additional personal information in the course of job-related activities throughout the period of you working for us and you will be informed of this and this privacy notice will be updated accordingly.

In some cases, we collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers, information from credit reference agencies and information from Disclosure Barring Service (DBS) checks, as permitted by law.

5 How is your personal information processed?

We need to process your personal information to enter into an employment contract with you and to meet our obligations under your employment contract. For example, we need to process your information to pay you in accordance with your employment contract and to administer benefits, pension and insurance entitlements.

In some cases, we need to process information to ensure that we are complying with our legal obligations. For example, we are required to check an employee's entitlement to work in the UK, to ensure statutory deductions are made, to comply with health and safety laws and to enable employees to take periods of leave to which they are entitled.

Generally, we will rely upon the following legal basis for processing your personal information:

1. to perform our duties and obligations in relation to the employment contract we have entered into with you;
2. for our legitimate interests (or those of a third party), including:
 - Run recruitment and promotion processes
 - Maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency), and records of employee contractual and statutory rights;
 - Operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace;
 - 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;
 - Provide references on request for current or former employees;
 - Respond to and defend against legal claims;
 - Maintain and promote equality in the workplace;
 - Monitoring and assessing compliance with organisational policies and procedures
 - Meet obligations under health and safety law

- Apply appropriate physical and logical security measures such as monitoring and logging systems and building access and egress.

3. to comply with a legal obligation, for example when processing information relation to salary that is passed to HMRC;

Where we rely on legitimate interests as a reason for processing information, we have considered whether or not those interests are overridden by the rights and freedoms of employees or workers and have concluded that they are not. Our rationale is recorded in a Legitimate Interests Assessment document.

6 Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

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

7 Special Category personal data

7.1 Special Category personal data

We may also collect, store and use the following “special categories” of more sensitive personal information which require a higher level of protection. They include:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions
- Trade Union membership
- Information about your health, such as any medical condition, health and sickness records and including:
 - where you leave employment and under any share plan operated by the company the reason for leaving is determined to be ill health, injury or disability, the records relating to that decision;
 - details of any absences (other than holidays) from work including time on statutory parental leave and sick leave;
 - any health information in relation to a claim made under the permanent health insurance scheme; and
 - where you leave employment and the reason for leaving is related to your health, information about that condition needed for pensions [and permanent health insurance] purposes.

- Genetic information and biometric information
- Information about criminal convictions and offences.

A more extensive list of what personal information we may process can be found in the Schedule to the Rendall & Rittner Financial Data Retention Policy.

7.2 Justification

We need to have further justification for collecting, storing and using Special Category personal data. We may process this kind of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent
2. Where we need to carry out our legal obligations
3. Where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme.
4. Where it is necessary to protect you or another person from harm.
5. Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards
6. Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed 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.

7.3 Our obligations as an employer

In general, we will not process particularly sensitive personal information about you unless it is necessary for performing or exercising obligations or rights in connection with employment. On rare occasions, there may be other reasons for processing, such as it is in the public interest to do so. The situations in which we will process your sensitive personal information are listed below.

- We will use information about your physical or mental health, or disability status, to:
 - ensure your health and safety in the workplace;
 - assess your fitness to work;
 - provide appropriate workplace adjustments;
 - monitor and manage sickness absence; and
 - administer benefits including statutory maternity pay, statutory sick pay, and pensions and permanent health insurance.

We need to process this information to exercise rights and perform obligations in connection with your employment.

- If you leave employment due to ill health, injury or disability, we will use information about your physical or mental health, or disability status, in reaching a decision about your entitlements.

- If you apply for an ill-health pension under a pension arrangement operated by us, we will use information about your physical or mental health in reaching a decision about your entitlement.
- If we reasonably believe that you or another person are at risk of harm and the processing is necessary to protect you or them from physical, mental or emotional harm or to protect physical, mental or emotional well-being.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation to ensure meaningful equal opportunity monitoring and reporting.
- We will use trade union membership information to pay trade union premiums, register the status of a protected employee and to comply with employment law obligations.

7.4 Do we need your consent?

We do not need your consent if we use special categories of your personal information to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances we may approach you for your written consent to allow us to process certain particularly sensitive information. 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.

7.5 Information about criminal convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations, for example in relation to the requirements of the financial legislation under which we operate and provided we do so in line with our Data Protection Policy.

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. 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. We will use information about criminal convictions and offences in the following ways:

- To check the suitability of candidates applying for a role - particularly where that role is senior or involves a high degree of trust.
- To meet our legal or regulatory obligations, for example in relation to the appointment of an approved person, senior manager or where you are carrying out a controlled function.

Rendall & Rittner Financial has in place an Appropriate Policy document which outlines:

- the lawful basis for processing;
- procedures for complying with each of the UK GDPR principles;

- retention and deletion policies; and an indication of the retention period for the specific information

8 Automated decision making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

1. Where we have notified you of the decision and given you 30 days to request a reconsideration
2. Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights
3. In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

9 Third Parties

We may have to share your personal information with third parties, including third-party service providers such as payroll providers and credit reference agencies. We require third parties to respect the security of your personal information and to treat it in accordance with the law.

9.1 Why might my personal information be shared with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

9.2 Which third party service providers process my personal information?

“Third parties” includes third-party service providers (including contractors and designated agents). A list of the third-party service providers we use can be obtained on request to the Data Protection Team. The types of processing we may outsource to third-party service providers are:

- Payroll;
- Pensions;

- Credit Reference Agency checks and some other employment checks;
- Travel and subsistence.

9.3 How secure is my information with third parties service providers?

All of our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies.

Other than as described in 9.4 below, we do not allow our third-party service providers to use your personal information for their own purposes. We only permit them to process your personal information for specified purposes and in accordance with our instructions.

9.4 Third Party Controllers

We have partnered with several third parties that provide access to their services by means of a license to use their software and services. They may require you to set up an individual account in order for you to access the software and services and in doing so to provide a certain amount of personal information. This will typically be name and email address, but the third party will inform you of what information they require. Once the account is set-up and you are able to access and use the software to undertake your role within Rendall & Rittner Financial, the third party may also monitor your activity.

10 Transferring information outside the UK

We may provide the personal information we collect about you to third party contractors (see section 9 above) that may use subcontractors that are located outside of the UK. Where there are no adequacy regulations in respect of those countries it means that the country to which your personal data is transferred is not deemed to provide an adequate level of protection for your personal information.

To ensure that your personal information does receive an adequate level of protection, we will implement appropriate measures to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects UK law on data protection, for example International Data Transfer Agreement (IDTA).

11 Data Security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to our personal information to those employees, agents, contractors and other third parties who have a business need to know. Except as stated in section 9.4 above, third parties will only process your personal information on our instructions and they are subject to a duty of confidentiality and must operate an adequate level of security.

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

In order to protect both your personal information, the integrity of our systems and our physical environment we may monitor access to systems and to the building from time to time. This information is only accessed when necessary to address a security concern.

12 Data Retention

We will only retain your personal information 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.

Details of retention periods for different aspects of your personal information are available in our Data Retention Policy and Schedule.

13 What if you do not provide personal information?

You have some obligations under your employment contract to provide the organisation with information. 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 organisation with personal information in order to exercise your statutory rights, such as in relation to statutory leave entitlements. Failing to provide the information 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 organisation to enter a contract of employment with you. If you do not provide this information, this will hinder the organisation's ability uphold the employment contract and comply with our legal obligations.

14 Your Rights

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your employment with us.

Under certain circumstances, by law you have the right to:

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

Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

Request erasure of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing.

Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you.

Request the transfer of your personal information to another party.

If you would like to exercise any of these rights, please contact our Data Protection Officer at dataprotection@rendallandrittner.co.uk

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Where you have given consent for us to use your personal information for specific purposes, you have the right to withdraw this consent at any time. If you would like to exercise any of the above rights, please contact our Data Protection Officer on the contact details above.

If you would like to exercise any of those rights, please contact our Data Protection Team or HR by:

- emailing us at dataprotection@rendallandrittner.co.uk
- writing to us at Rendall and Rittner Limited, 13B St George Wharf, London SW8 2LE
- calling us on +44 (0)20 7702 0701.

HR

- emailing us at hr.admin@rendallandrittner.co.uk
- writing to us at Rendall and Rittner Limited, 13B St George Wharf, London SW8 2LE
- calling us on +44 (0)20 7702 0701.

We will respond to any request within the statutory deadline of one calendar month. This deadline may be extended where applicable under Data Protection Legislation. We will inform you if your request meets the extension criteria.

15 Complaints and Queries

We hope that we can resolve any query or concern you raise about our use of your information. If you have any questions or queries about how we are processing your personal information, please contact the Data Protection Team by:

- emailing us at dataprotection@rendallandrittner.co.uk
- writing to us at Rendall and Rittner Limited, 13B St George Wharf, London SW8 2LE
- calling us on +44 (0)20 7702 0701.

The Information Commissioner's Office (ICO) is the UK's regulator for data protection. Under Data Protection Legislation you have the right to make a complaint to the ICO if you feel we have not complied with our data protection obligations. You can contact the ICO by:

- Visiting the ICO's website <https://ico.org.uk/>
- Calling them on 0303 123 1113.

16 Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates.

17 Odevo Group Companies:

Trinity Property Group Limited

Vantage Point, 23 Mark Rd, Hemel Hempstead Industrial Estate,
Hemel Hempstead HP2 7DN

Telephone number: [0345 345 1584](tel:03453451584)

Email address: dataprotection@trinityestates.com

Premier Estates Limited

Chiltern House,
72-74 King Edward Street,
Macclesfield,
Cheshire, SK10 1AT

Telephone number: [0345 491 8899](tel:03454918899)

Email address: info@premierestates.co.uk

The Vegner Group Ltd

9-11 The Quadrant
Richmond
TW9 1BP

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Telephone number: 0208 662 8800

Email address: customer.services@b-hivepropertysolutions.

Pinnacle Property Management Ltd

Units 1, 2 & 3, Beech Court

Hurst

Berkshire, RG10 0RQ

Telephone number: 01189 320180

Email address: info@pinnaclepm.co.uk

This privacy notice was last updated on 7th May 2024.