

Kennett Insurance Brokers & Risk Management 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 the UK General Data Protection Regulation (GDPR) and Data Protection Act 2018. It applies to current and former employees, workers and contractors.

This notice does not form part of any Terms and Conditions of Employment. We may update this privacy notice at any time.

It is important that you read 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.

DATA CONTROLLER DETAILS

Kennett Insurance Brokers & Risk Management is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

DATA PROTECTION PRINCIPLES

In relation to your personal data, we will:

- Process it fairly, lawfully and in a clear, transparent way.
- Collect your data only for reasons that we find proper for the course of your employment in ways that have been explained to you.
- Only use it in the way that we have told you about.
- Ensure it is correct and up to date.
- Keep your data for only as long as we need it.
- Process it in a way that ensures it will not be used for anything that you are not aware of or have consented to (as appropriate), lost or destroyed.

TYPES OF PERSONAL DATA WE PROCESS

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

- Your personal contact details including your name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Gender.
- Marital status.
- Dependants, next of kin and emergency contact information.
- National Insurance number.
- Bank account details, payroll records and tax status information.
- Salary, annual leave, pension and benefits information.
- Start date.
- Location of employment or workplace.
- Copy of driving licence.
- Recruitment information (including copies of right to work documentation, education history, employment history, references and other information included in a CV, application form or cover letter or as part of the application process).
- Employment records (including current and previous job titles, work history, working hours, training records, professional memberships and other terms and conditions relating to your employment

with us).

- Performance information (including performance management documentation, measurements against targets, formal warnings and related documentation with regard to capability procedures).
- Disciplinary and grievance information (including letters of concern, formal warnings and other documentation with regard to any formal procedure).
- Compensation history.
- Leave records (including annual leave, family leave and sickness absence).
- Health and Safety records (including training, compliance and accident/near-miss information).
- CCTV footage and other information obtained through electronic means such as building entry fob records.
- Information about your use of our information and communications systems.
- Photographs.

We may also collect, store and use the following “special categories” of more sensitive personal information:

- Information used for equal opportunities monitoring about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Trade union membership.
- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences.

HOW WE COLLECT YOUR PERSONAL DATA

We collect data about you in a variety of ways and this will usually start when we undertake a recruitment exercise where we will collect the data from you directly. This includes the information you would normally include in a CV, application form and / or a recruitment cover letter, or notes made by our recruiting officers during a recruitment interview.

Further information will be collected directly from you when you complete forms at the start of your employment, for example, your bank and next of kin details. Other details may be collected directly from you in the form of official documentation such as your driving licence, passport or other right to work evidence.

In some cases, we will collect data about you from third parties, such as employment agencies, former employers when gathering references, credit reference agencies, the Financial Conduct Authority (FCA) and, where agreed, from the Disclosure and Barring Service (DBS).

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

WHY WE PROCESS YOUR PERSONAL DATA

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the contract we have entered into with you, specifically our obligations as set out in your Terms and Conditions of Employment.
- Where we need to comply with a legal obligation.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest or for official purposes.

For example, we need to collect your personal data in order to:

- Carry out the employment contract that we have entered into with you.
- Ensure you are paid.

We also need to collect your data to ensure we are complying with legal requirements such as:

- Ensuring tax and National Insurance is paid.
- Carrying out checks in relation to your right to work in the UK.
- Making reasonable adjustments.

Grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

The situations in which we may process your personal information are listed below:

- Making a decision about your recruitment or appointment.
- Determining the terms on which you work for us.
- Checking you are legally entitled to work in the UK.
- Maintaining comprehensive up to date personnel records about you to ensure, amongst other things, effective correspondence can be achieved and appropriate contact points in the event of an emergency are maintained.
- Paying you and, if you are an employee, deducting tax and National Insurance contributions and managing statutory leave and pay systems such as maternity leave and pay.
- Providing the following benefits to you: Health Cash Plan, Income Protection Policy, Private Medical Insurance, Death in Service Benefit.
- Providing a pension scheme and liaising with your pension provider.
- Providing insurance cover for Company cars, and dealing with related claims.
- Administering the terms and Conditions of Employment we have entered into with you.
- Business operations, management and planning, including accounting, auditing and restructuring exercises.
- To comply with regulatory requirements.
- Effectively monitoring both your conduct and your performance, and to undertake procedures with regard to both of these if the need arises.
- Dealing with client concerns and complaints involving you, or other employees, workers and contractors, including accidents at work.
- Making decisions about salary reviews and compensation.
- Assessing qualifications for a particular job or task, including decisions about promotions.
- Gathering evidence for possible grievance or disciplinary hearings.
- Offering a method of recourse for you against decisions made about you via a grievance procedure.
- Making decisions about your continued employment or engagement.
- Making arrangements for the termination of our working relationship.
- Assessing education, training and development requirements.
- Offering a method of effective communication, including knowledge sharing, between colleagues.
- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work.

- Ascertaining your fitness to work, including gaining expert medical opinion when making related decisions.
- Managing sickness absence through maintaining an effective sickness absence management system including monitoring the amount of leave and subsequent actions to be taken, and the making of reasonable adjustments.
- Complying with health and safety obligations.
- To prevent fraud.
- To prevent theft.
- To ensure our premises are secure, including preventing unauthorised access.
- To monitor your use of our information and communication systems to ensure compliance with our IT policies.
- To ensure our administrative and IT systems are secure and robust, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- To conduct data analytics studies to review and better understand employee retention and attrition rates.
- Equal opportunities monitoring.

SPECIAL CATEGORIES OF PERSONAL DATA

We must process special categories of data in accordance with more stringent guidelines. Most commonly, we will process special categories of data when the following applies:

- You have given explicit consent to the processing.
- We must process the data in order to carry out our legal obligations or exercise rights in connection with employment.
- It is needed in the public interest.

Less commonly, we may process special categories of data 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.

We will use your particularly sensitive personal information in the following ways:

- We will use information relating to leaves of absence, which may include sickness absence or family related leaves, in our sickness absence management procedures and to comply with employment and other laws.
- We will use information about your physical or mental health, or disability status, 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.
- We will use information about your race or national or ethnic origin, religious, philosophical, political or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

We do not need your consent if we use special categories of personal data in order to carry out our legal obligations, exercise specific rights under employment law or to comply with regulatory obligations. However, we may ask for your consent to allow us to process certain particularly sensitive data. If this occurs, you will be made fully aware of the reasons for the processing. As with all cases of seeking consent from you, you will have full control over your decision to give or withhold consent and there will be no consequences where consent is withheld. Consent, once given, may be withdrawn at any time. There will be no consequences where consent is withdrawn.

CRIMINAL CONVICTION PERSONAL DATA

We will only use information relating to criminal convictions where the law allows us to do so. This will usually be where it is appropriate given the nature of your role, where such processing is necessary to carry out our obligations and where the law permits us. This data will usually be collected at the recruitment stage, however, may also be collected during your employment.

We are allowed to use your personal information in this way to carry out our obligations:

- To ensure compliance with the Financial Conduct Authority (FCA) guidelines in the UK.
- To satisfy our Company car insurance policy obligations, and related claims.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, 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.

AUTOMATED DECISION MAKING

We do not envisage that any decisions will be taken about you using automated means (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you, however we will notify you in writing if this position changes.

IF YOU DO NOT PROVIDE YOUR PERSONAL DATA TO US

One of the reasons for processing your personal data is to allow us to carry out our duties in line with your Terms and Conditions of Employment. If you do not provide us with the personal data needed to do this, we will be unable to perform those duties eg ensuring you are paid correctly. We may also be prevented from confirming, or continuing with, your employment with us in relation to our legal obligations if you do not provide us with this information eg confirming your right to work in the UK or, where appropriate, confirming your legal status for carrying out your work via a criminal records check.

SHARING YOUR PERSONAL DATA

Your personal data will be shared with colleagues within the Company where it is necessary for them to undertake their duties under your Terms and Conditions of Employment. This includes, for example, your line manager for their management of you, our Employment Services division for maintaining personnel and workplace safety records, our Wealth Management division for administering employee benefits and our Accounts department for administering payroll.

We will share your personal data with third-party service providers. The following activities are carried out by third-party service providers: payroll, pension administration, benefits provision and administration, and IT services.

We will share your personal information with other entities in our group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data.

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator, including the Financial Conduct Authority (FCA), or to otherwise comply with the law.

All our third parties, including third-party service providers and other entities in the group, are required to take appropriate security measures to protect your personal information in line with our policies and in accordance with the law. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

PROTECTING YOUR PERSONAL DATA

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 your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information 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 security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

HOW LONG WE KEEP YOUR PERSONAL DATA FOR

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.

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. In some cases, we will keep your personal data for a period after your employment has ended.

Retention periods can therefore vary depending on why we need your personal data, as set out below:

MAXIMUM RETENTION PERIOD	TYPES OF PERSONAL DATA PROCESSED	RETENTION PERIOD DETAILS
One (1) year	References issued for employment	1 year
Two (2) years	Copy of passport or other eligible 'Right to Work' documentation	2 years after employment ceases
	Compassionate leave information, dependants' leave information, annual leave records, discretionary leave information	2 years from date of leave
	Jury service information	2 years from date of jury service
	Performance management documentation	2 years following the issue of a warning
Three (3) years	Equality monitoring information	3 years after employment ceases
	P45, Tax and NICS Forms	3 years after the end of the financial year to which they relate
	Maternity leave details, paternity leave details, adoption leave details, shared parental leave details	3 years after the end of the tax year in which the leave period ends

	Driving offences/negligent driving records	3 years for negligence for a known accident Records for driving convictions will be removed once the conviction is spent
Eighteen (18) years	Parental leave information	18 years from the birth/adoption of the child
Six (6) years	Salary processing information and records	6 years after employment ceases and 3 years after the end of the financial year for tax records and correspondence
	Grievance/disciplinary documentation, investigation documents, witness statements	6 years after employment ceases. If no case to answer, 6 months following conclusion
	name, home address, personal phone number, personal email address, national insurance no, date of birth, gender, next of kin name, next of kin contact information, cv, interview records, employment references, application form, offer of employment, bank details, induction documentation, copy of driving licence, copy of birth/adoption certificate, statement of main terms and conditions, marital status, qualifications, professional membership documentation, performance management and appraisal information, L&D/training records, sickness absence records and supporting documentation, occupational health records, GP report and medical consent, payslips, expenses records, health cash plan/private health scheme details, bereavement leave information, flexible working information, arbitration, conciliation, mediation records, dismissal records, resignation information, car business insurance details, H&S investigation details, witness statements,	6 years after employment ceases
	Redundancy records	6 years from date of redundancy
	Retirement records	6 years from end of scheme

Twelve (12) years	Pension scheme details	12 years from the end of any benefit payable under the policy
Fifteen (15) years	Work-related injury records, accident report form information	3 years for personal injury claim. 15 years for negligence.
Forty (40) years	Health records for health surveillance	40 years
Retention period cannot be defined in advance	Copy of driving licence	Duration the employee drives on business plus 3 years
	Risk assessments	Indefinite
	Email signature, organisation chart information, voicemail messages, photographs, corporate linked social media account, business cards, call recordings, informal concerns records, fire safety records	Personal data will not be kept longer than is necessary for the purpose or purposes for which it is being processed

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

YOUR DUTY TO INFORM US OF CHANGES

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 working relationship with us.

YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA

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

- Be informed. This means that we must tell you how we use your personal data, and this is the purpose of this privacy notice
- Request access to your personal information. You have the right to access the personal data that we hold on you. To do so, you should make a subject access request. You can read more about this in our Subject Access Request Policy which is available in our Employee Handbook.
- 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 (see below).
- 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 particular situation which makes you want to object to processing on this ground.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Portability. You can request we transmit personal data concerning you to another data controller, which you provided to us, in a structured, commonly used and machine-readable format, where

technically feasible.

- 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.

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Withdrawing your consent means that we will stop processing the personal data that you had previously given us consent to use. There will be no consequences for withdrawing your consent. However, in some cases, we may continue to use the personal data where so permitted by having a legitimate reason for doing so.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact our Compliance Director in writing.

You will not usually 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 such circumstances.

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.

MAKING A COMPLAINT

The supervisory authority in the UK for data protection matters is the Information Commissioner (ICO). If you think your data protection rights have been breached in any way by us, you are able to make a complaint to the ICO.

COMPLIANCE DIRECTOR

Our Compliance Director oversees compliance with our professional responsibilities and the reporting of any failures to comply with legislative requirements, including data protection. If you have any questions about this privacy notice or how we handle your personal information, please contact our Compliance Director at aconway@wfrgroup.co.uk.

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. We may also notify you in other ways from time to time about the processing of your personal information.