

# **Bluemay Limited and Bluemay Weston Limited**

## **Employment General Data Protection Regulation (“GDPR”) Transparency Notice**

### **About this Notice**

This GDPR Transparency Notice describes how Bluemay Limited ("BL") and Bluemay Weston Limited ("BWL") ('we') collect and use your personal information during and after your relationship with us. Each of BL and BWL is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you and explaining it clearly to you.

This Notice applies to prospective, existing and former employees of BL and BWL, and third parties such as employment agencies acting for you. It is important that you read this Notice, together with any other privacy information or notices 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. We reserve the right to update this Employment GDPR Transparency Notice at any time, and we will publish a new Employment GDPR Transparency 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.

The Directors of BL and BWL have responsibility for BL and BWL compliance with data protection law. If you have any questions about this Employment GDPR Transparency Notice or how we handle your personal information, please contact the Directors on 01380 821821 or by email to [gdpr@bluemay.co.uk](mailto:gdpr@bluemay.co.uk) or to [gdpr@bluemayweston.co.uk](mailto:gdpr@bluemayweston.co.uk). 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 the course of our dealings with you.

## **Information we hold**

Personal data, or personal information, means any information about an individual from which that person can be identified. We collect different information depending on your relationship with us.

### **Prospective employees and job applicants**

For the legitimate interest of managing our business we process:

- Your name, title, address and contact details.
- Your curriculum vitae or other information as supplied by you (or a third party agent acting with your permission for you), giving details such as your educational and employment history, hobbies and interests and any relevant medical matters.
- Your current rate of pay or annual salary.
- Notes from interviews (whether in person or with a third party agent acting with your permission for you, and from face to face meetings, telephone conversations or exchange of written or electronic messages).
- Information about you we may gather from publicly available sources.
- Feedback you provide to us on the job application process.
- Information provided to us from referees you have given us permission to approach for relevant employment information.
- We may, from time to time, approach you for your consent to allow us to process your personal information for other purposes. If we do so, we will provide you with 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.

### **Employees**

For the legitimate interest of managing our business, in addition to the above we process:

- Your bank details, National Insurance number, passport or national identity card details, next of kin details, certain clothing size information for workwear and any relevant permission to work details including checking photographic identification and proof of address.
- Information relating to the formal nature of your employment, such as the Contract of Employment, Job Description, details of working hours, holiday entitlements,

sickness records, maternity or paternity leave, pay records, tax details, expenses, disciplinary and grievance issues and any other matters which form part of the legitimate interests of our employment contract with you.

We may, from time to time, approach you for your consent to allow us to process your personal information for other purposes. If we do so, we will provide you with 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.

We may, with your prior knowledge and consent, hold and use photographs of you (whether film, print or digital) as a record or to illustrate elements of our processes or services for our legitimate business interests. Please note that it may not be possible to withdraw from circulation a photograph or photographs in printed form after the relevant publication has been printed.

### **Past employees**

We retain your name, title and last known contact information including address, telephone numbers and email address, along with details of your employment record with us. Such processing is necessary for supplying legally required information to regulatory authorities and for the purposes of supplying (at your request or with your permission only) references to third parties such as prospective employers. We may, from time to time, approach you for your consent to allow us to process your personal information for other purposes. If we do so, we will provide you with 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.

### **How we collect information about you**

We collect personal information direct from you or from third party agents acting for you when you make contact as a prospective employee of BL or BWL, and when we enter into an employment contract with you. We collect further information from you during the period of our business relationship, from employment referees (whose details are provided by you), and from public sources such as an online search or from social media sites.

## **Our lawful basis for gathering and using personal information**

We will only use your personal information when the law allows us to for our legitimate interests and your interests and fundamental rights do not override those interests. 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.

## **Data sharing**

We share personal data between BL and BWL as necessary to ensure the smooth running of our business. With your consent we may share relevant elements of your information if we refer you to a third party adviser for specialist advice, such as for example a doctor, health insurer or vehicle insurer, training body or in the normal course of everyday business matters.

The following activities are carried out by third-party service providers on our behalf: IT support and maintenance; hosting our website (including analytics); health insurance; motor insurance; external training courses. All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. 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.

## **Transferring information outside the European Economic Area (“EEA”)**

Our electronic personal information is hosted primarily on servers located within the EEA with some data stored on or backed up to secure cloud servers in the United States of America. If we are required to transfer information outside the EEA, we only do so where permitted by law, and where we have put in place appropriate measures to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection. If you are based outside the EEA we may transfer personal information to the correspondence address you provide to us. We will take all reasonable steps

to ensure that such transfers are secure. By engaging with us from outside the EEA you acknowledge and agree that such transfers are necessary for us to provide services to you.

## **Data Security**

We have put in place appropriate measures to protect the security of your information. Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

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 process your personal information only on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected 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 information**

We will only retain your personal information for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

Where a minimum retention period is required by law (such as retaining records for HM Revenue and Customs purposes) we comply with that minimum period plus up

to 12 months to allow time for us to anonymise or delete information in accordance with our internal data management processes. Please contact [gdpr@bluemay.co.uk](mailto:gdpr@bluemay.co.uk) or [gdpr@bluemayweston.co.uk](mailto:gdpr@bluemayweston.co.uk) if you would like to discuss specific retention periods applicable to your matters. If we are required to retain your information longer than our standard retention periods, we will let you know (unless we are prevented by law from doing so.)

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 rights in connection with personal information**

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 (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. 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, for example if you want us to establish its accuracy or the reason for processing it.

- Request the transfer of your personal information to another party.
- Withdraw consent. 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. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we are required to continue to process your information in accordance with another lawful basis which has been notified to you.

To exercise any of the above rights, please contact BL or BWL on 01380 821821 or by email to [gdpr@bluemay.co.uk](mailto:gdpr@bluemay.co.uk) or to [gdpr@bluemayweston.co.uk](mailto:gdpr@bluemayweston.co.uk). You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may refuse to comply if your request for access is clearly unfounded or excessive. 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.

In addition to the above you may lodge a complaint with the appropriate supervisory body for data protection.