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| Policy Number: 19 | Data Protection & Privacy Policy  |

The following document summarises the policy in use within Stan Robinson (Stafford) Limited and all subsidiary and associate companies within the group.

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| Introduction |

We need to gather and use information or ‘data’ about you as part of our business and to manage our relationship with you.

We take the security and privacy of your data seriously and intend to comply with our legal obligations under the Data Protection Act 2018 (2018 Act) and the EU General Data Protection Regulation (GDPR) in respect of data privacy and security.

This Policy applies to current and former employees, workers, volunteers, apprentices and consultants. If you fall into one of these categories, then you are a ‘data subject’ for the purposes of this Policy. You should read this Policy alongside your contract and any other notice we issue to you from time to time in relation to your data.

The Company is a ‘data controller’ for the purposes of your personal data. This means that we decide how and why we process your personal data.

This Policy explains how we will hold and process your information. It explains your rights as a data subject. It also explains your obligations when obtaining, handling, processing or storing personal data in the course of working for, or on behalf of, the Company.

This Policy does not form part of your contract. We reserve the right to update this Policy at any time. It is intended that this Policy is fully compliant with the **2018 Act** and the **GDPR.** If any conflict arises between those laws and this Policy, the Company intends to comply with the 2018 Act and the GDPR.

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| Who we are |

Stan Robinson Group Ltd is the parent company for Stan Robinson Distribution Ltd and Stan Robinson Stafford Ltd. In this document all 3 areas of the company will be referred to as Stan Robinson.

Stan Robinson Stafford Ltd is the data controller for all the organisations within the group. This means that Stan Robinson Stafford Ltd determines what data is collected by each organisation within the group, how this data is going to be used and how this data is protected.

Our registered office address is:

**Stan Robinson Stafford Ltd**

**Ladfordfields**

**Seighford**

**Stafford**

**ST18 9QE**

**01785 282501**

If you have questions about how we process personal data, or would like to exercise your data subject rights, please email us at stacey.robinson@stanrobinson.com.

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| How we define personal data |

* ‘Personal data’ means information which relates to a living person who can be identified from that data (a ‘data subject’) on its own or when taken together with other information which is likely to come into our possession. It includes any expression of opinion about the person and an indication of the intentions of us or others in respect of that person. It does not include anonymised data.
* This Policy applies to all personal data, whether it is stored electronically, on paper or in/on other materials.
* This personal data might be provided to us by you or by someone else (such as a former employer, your doctor or a credit reference agency), or it could be created by us. It could be provided or created during the recruitment process or during the course of your contract, or after it has ended. It could be created by your [line manager] or other colleagues.

We will collect and use the following types of personal data about you:

* Recruitment information, such as your application form and CV, references, qualifications and membership of any professional bodies and details of any pre-employment assessments.
* Your contact details and date of birth.
* The contact details for your emergency contacts.
* Your gender.
* Your marital status and family details.
* Information about your contract, including start and end dates, role and location, working hours, details of promotion, salary (including details of previous remuneration), pension, benefits and holiday entitlement.
* Your bank details and information in relation to your tax status, including your National Insurance number.
* Your identification documents, including your passport and driving licence and information in relation to your immigration status and right to work for us.
* Information relating to disciplinary or grievance investigations and proceedings involving you (whether or not you were the main subject of those proceedings).
* Information relating to your performance and behaviour at work.
* Training records.
* Electronic information in relation to your use of IT systems/swipe cards/telephone systems.
* Your images (whether captured on CCTV or video or by photograph).

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| How we define special categories of personal data |

Special categories of personal data’ are types of personal data consisting of information about:

* Your racial or ethnic origin
* Your political opinions
* Your religious or philosophical beliefs
* Your trade union membership
* Your genetic or biometric data
* Your health
* Your sex life and sexual orientation

We may hold and use any of these special categories of your personal data in accordance with the law.

We may hold and use personal data relating to criminal allegations, offences, proceedings and convictions.

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| How we define processing |

‘Processing’ means any operation which is performed on personal data, such as:

* Collection, recording, organisation, structuring or storing
* Adaption or alteration
* Retrieval, consultation or use
* Disclosure by transmission, dissemination or otherwise making available
* Alignment or combination
* Restriction, destruction or erasure

‘Processing’ includes processing personal data which forms part of a filing system and any automated processing.

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| Collection of personal data |

We have to process your personal data in various situations during your recruitment, employment (or engagement) and even following termination of your employment (or engagement). We collect personal data from you for one or more of the following purposes:

* To decide whether to employ (or engage) you
* To decide how much to pay you and the other terms of your contract with us
* To check you have the legal right to work for us
* To train you and review your performance\*
* To decide whether and how to manage your performance, absence or conduct\*
* To carry out a disciplinary or grievance investigation or procedure in relation to you or someone else
* To determine whether we need to make reasonable adjustments to your workplace or role because of your disability\*
* To monitor diversity and equal opportunities\*
* To monitor and protect the security (including network security) of the Company, you, our other staff, our customers and others
* To monitor and protect your health and safety and that of our other staff, our customers and third parties\*
* To pay you and provide pension and other benefits in accordance with the contract between us\*
* To provide you with information that you have requested or which we think may be relevant to a subject in which you have demonstrated an interest;
* To initiate and complete commercial transactions with you, or the entity that you represent, for the purchase of products and/or services;
* To fulfil a contract that we have entered into with you or with the entity that you represent;
* To manage any communication between you and us.

We will only process special categories of your personal data (see above) in certain situations in accordance with the law. For example, we can do so if we have your explicit consent. If we ask for your consent to process a special category of personal data, then we will explain the reasons for our request. You do not need to consent and can withdraw consent later if you choose to by contacting the HR department.

We do not need your consent to process special categories of your personal data when we process it for the following purposes:

* Where it is necessary for carrying out rights and obligations under employment law.
* Where it is necessary to protect your vital interests or those of another person where you/they are physically or legally incapable of giving consent.
* Where you have made the data public.
* Where processing is necessary for the establishment, exercise or defence of legal claims.
* Where processing is necessary for the purposes of occupational health or for the assessment of your working capacity.

We might process special categories of your personal data (see collection of personal data) which have an asterisk beside them. In particular, we will use information in relation to:

* Your race, ethnic origin, religion, sexual orientation or gender to monitor equal opportunities.
* Your sickness absence, health and medical conditions to monitor your absence; assess your fitness for work; pay you benefits; comply with our legal obligations under employment law, including making reasonable adjustments; and look after your health and safety.
* Your trade union membership to pay any subscriptions and to comply with our legal obligations in respect of trade union members.

We do not take automated decisions about you using your personal data or use profiling in relation to you.

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| Lawful basis for the processing of personal data |

The table below describes the various forms of personal data we collect and the lawful basis for processing this data. Our business systems infrastructure and compliance mean that all personal data is processed on common, Group-wide platforms. We have processes in place to make sure that only those people in our organisation who need to access your data can do so. A number of data elements are collected for multiple purposes, as the table below shows. Some data may be shared with third parties and, where this happens, this is also identified below.

When we process on the lawful basis of legitimate interest, we apply the following test to determine whether it is appropriate:

**The purpose test** – is there a legitimate interest behind the processing?

**Necessity test** – is the processing necessary for that purpose?

**Balancing test** – is the legitimate interest overridden, or not, by the individual’s interests, rights or freedoms?

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| Storage of personal data |

Stan Robinson is a UK based organisation whose primary offices are in the UK.

* The majority of our website and web applications systems are hosted in the EU and are accessed only by our UK-based staff.
* In all these instances, we have appropriate contractual and security measures in place to ensure that personal data is protected.
* Our customer relationship management, marketing and accounting systems for all our businesses are UK-based.
* Unless we specifically state otherwise all of the CSPs that we use utilise EU-located processing facilities.
* Our payment processors and banking arrangements are based in the EU.
* We ship and deliver physical products around the UK; therefore use logistics companies that are based within the UK. We have appropriate legal and security relationships with those partners.
* We operate a data retention policy in respect of all data, whether paper-based or digital and those aspects of it which relate to personal data are retained for 1-7 years depending on the nature of the data.

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| Security measures |

We have what we believe are appropriate security controls in place to protect personal data. Risk assessment, including assessing risks to the rights and freedoms of data subjects, is at the heart of our processes. We do not, however, have any control over what happens between your device and the boundary of our information infrastructure. You should be aware of the many information security risks that exist and take appropriate steps to safeguard your own information. We accept no liability in respect of breaches that occur beyond our sphere of control.

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| Your rights as a data subject |

As a data subject whose personal information we hold, you have certain rights. If you wish to exercise any of these rights, please email stacey.robinson@stanrobinson.com

In order to process your request, we will ask you to provide two valid forms of identification for verification purposes. Your rights are as follows:

* **The right to be informed**
At Stan Robinson, we are obliged to provide clear and transparent information about our data processing activities. This is provided by this privacy policy and any related communications we may send you.
* **The right of access**
You may request a copy of the personal data we hold about you free of charge. Once we have verified your identity and, if relevant, the authority of any third-party requestor, we

will provide access to the personal data we hold about you as well as the following information:

a) The purposes of the processing
b) The categories of personal data concerned
c) The recipients to whom the personal data has been disclosed
d) The retention period or envisioned retention period for that personal data
e) When personal data has been collected from a third party, the source of the personal data

If there are exceptional circumstances that mean we can refuse to provide the information, we will explain them. If requests are frivolous or vexatious, we reserve the right to refuse them. If answering requests is likely to require additional time or occasions unreasonable expense (which you may have to meet), we will inform you.

* **The right to rectification**
When you believe we hold inaccurate or incomplete personal information about you, you may exercise your right to correct or complete this data. This may be used with the right to restrict processing to make sure that incorrect/incomplete information is not processed until it is corrected.
* **The right to erasure (the ‘right to be forgotten’)**
Where no overriding legal basis or legitimate reason continues to exist for processing personal data, you may request that we delete the personal data. This includes personal data that may have been unlawfully processed. We will take all reasonable steps to ensure erasure.
* **The right to restrict processing**
You may ask us to stop processing your personal data. We will still hold the data, but we will not process it any further. This right is an alternative to the right to erasure. If one of the following conditions applies you may exercise the right to restrict processing:

a) The accuracy of the personal data is contested
b) Processing of the personal data is unlawful
c) We no longer need the personal data for processing, but the personal data is required for part of a legal process
d) The right to object has been exercised and processing is restricted pending a decision on the status of the processing

* **The right to data portability**
You may request your set of personal data be transferred to another controller or processor, provided in a commonly used and machine-readable format. This right is only available if the original processing was on the basis of consent, the processing is by automated means and if the processing is based on the fulfilment of a contractual obligation.
* **The right to object**
You have the right to object to our processing of your data where:
	+ Processing is based on legitimate interest;
	+ Processing is for the purpose of direct marketing;
	+ Processing is for the purposes of scientific or historic research;
	+ Processing involves automated decision-making and profiling.

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| Complaints & useful links |

Should you wish to discuss a complaint, please feel free to contact us using the details provided. All complaints will be treated in a confidential manner.

Should you feel unsatisfied with our handling of your data, or about any complaint that you have made to us about our handling of your data, you should escalate your concern to the Information Commissioner’s Office (ICO), who is also our lead supervisory authority. <https://ico.org.uk/global/contact-us/>. Or call 0303 123 1113.

The following internal policies should be read alongside our [Data Protection & Privacy Policy] and provide further guidance:

* Retention and Deletion Policy
* Data Subject Access Request Procedure Policy
* Personal data breach Policy
* Consent Procedure
* CCTV Policy
* Records Management Policy
* Applicant Privacy Policy
* Disciplinary Policy
* IT Procedures