



JHC Employee Privacy Notice

1. How JHC Systems Limited ("We", "our") use your information

- a) We will collect and process data about employees for legal, regulatory, personnel, administrative, contractual and legal compliance and governance and management purposes and to enable us to meet our legal and contractual obligations as an employer, for example to pay you, monitor your performance and to administer benefits in connection with your employment. "Employees" also includes contractors and Non-Executive Directors.
- b) We may process sensitive personal data relating to employees including, as appropriate:
 - i) information about an employee's physical or mental health in order to support employees accordingly.
 - ii) the employee's ethnic origin or nationality or similar information in order to monitor in accordance with equal opportunities legislation;
 - iii) in order to comply with legal requirements and obligations to third parties.
- c) More detailed information about the data We process and the purposes We use it for are set out in paragraphs 2 and 3 below.
- d) If you do not provide this data, We may be unable in some circumstances to comply with our obligations and it may cause you to be in breach of your employment agreement with us. We will tell you about the implications of that decision.

2. What data do We collect and process?

- a) Names, titles, and preferred names. Contact details such as telephone numbers, home addresses, and email addresses;
- b) Demographic information such as gender, age, date of birth, marital status, nationality, ethnicity and eligibility to work in the UK;
- c) Details of education, academic/professional qualifications;

- d) The terms and conditions of your employment;
- e) Details of your work pattern and attendance at work including any leave such as holiday, sickness and compassionate leave;
- f) Details of skills, experience and employment history, including start and end dates with previous employers and with the organisation;
- g) remuneration data and information, including benefits such as pensions and health benefits, tax calculations, student loan deductions, other deduction, records of current and historic earnings and tax code;
- h) Financial identifiers such as bank account details and national insurance number;
- i) Other operational personal data created, obtained, or otherwise processed in the course of carrying out our business activities, including but not limited to, MAC, IP addresses and website visit histories (including personal devices, if connected to JHC's network), logs of visitors, and logs of accidents, injuries and insurance claims;
- j) Other Human Resources data (not covered above) relating to employees including emergency contact information; referral source (e.g. agency, employee referral); performance reviews and ratings and employment references;
- k) Sensitive Personal data: personal characteristics and circumstances of sensitive nature such as racial or ethnic origin, mental and physical health, details of injuries, medication/treatment received; and background checks, including identity, financial, drug and criminal records checks and the copy of your passport or other ID;
- l) Copies of application forms for which you have requested We provide details or reference e.g. mortgage, bank account, credit card, tenancy reference, visa;



3. For what purposes do We collect and use this data?

- a) Administering your employment relationship with us;
- b) Administering compensation, payroll and benefits;
- c) Operate and keep a record of employee performance and related processes for workforce management purposes;
- d) Operate and keep a record of absence, for example to allow effective workforce management and to ensure that employees are receiving the pay or benefits to which they are entitled to;
- e) Obtain occupational health advice, to ensure that We meet our obligations under health and safety law;
- f) Complying with legal requirements, including our contractual obligations to our clients and our regulatory and corporate governance obligations;
- g) Selecting employees to participate in specific projects, development and administrative projects, assigning work to Employees;
- h) Establishing, exercising, enforcing or defending legal claims, conducting internal investigations of suspected breaches of corporate policies and monitoring Employees' use of corporate e-mail, communications, systems and Internet services;

4. How long We will keep this information

- a) We will hold your personal data for the duration of your employment and for up to 6 years following the end of employment for regulatory purposes and to defend or pursue any legal claims and for our legitimate business.

5. Our approach to information security

- a) To protect your information, We have policies, standards and procedures in place to make sure that only authorised personnel can access the information, that information is handled and stored in secure and sensible manner and all systems that can access the information have the

necessary security measures in place. To accomplish this, our employees, contractors and sub-contractors have roles and responsibilities defined in those policies and procedures.

- b) In addition to these operational measures We also use a range of technologies and security systems to reinforce the policies. The relevant policies can be found on the JHC internal Wiki.
- c) To make sure that these measures are suitable, We perform audits to identify the areas of weaknesses and non-compliance. Additionally, all areas of the organisation are constantly monitored and measured to identify problems and issues before they arise.

6. Your rights

- a) When exercising any of the rights listed below, in order to process your request, We may need to verify your identity for your security. In such cases your response will be necessary before you can exercise these rights.
- b) The right to access information We hold on you
 - i) At any point, you can contact us to request the information We hold on you as well as why We have that information, who has access to the information and where We obtained the information from. Once We have received your request We will respond within 30 days.
 - ii) There are no fees or charges for the first request but additional requests for the same data may be subject to an administrative fee.
- c) The right to correct and update the information We hold on you
 - i) If the data We hold on you is out of date, incomplete or incorrect, you have to inform us and your data be will be updated.
- d) The right to have your information erased
 - i) If you feel that We should no longer be using your data or that We are illegally



using your data, you can request the erasure of the data We hold from you.

- ii) When We receive your request We will confirm whether the data has been deleted or the reason why it cannot be deleted (for example because We need it for our legitimate business or regulatory purpose(s)).
- e) The right to object to processing of your data
 - i) You have the right to request that We stop processing your data. Upon receiving the request, We will contact you and let you know if We are able to comply or if We have legitimate grounds to continue to process your data. Even after you exercise your right to object, We may continue to hold your data to comply with our other rights or to bring or defend legal claims.
- f) The right to data portability
 - i) You have the right to request that We transfer your data to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.

7. Consent

- a) Where We need your consent to hold your information We will ask you to confirm your consent in writing and We will inform you why We are collecting the information, how We will use it, how long We keep it for, who else will have access to it and what your rights are as a data subject.
- b) We do not rely on consent for processing your personal data in the normal course of your employment.

8. Sharing your information

Where necessary to fulfil our obligations to you We may pass your details to third parties. These third parties include HMRC, Pre-Employment background checks, payroll providers and Benefit Providers.

9. Contact details

If you have any queries about this notice, need further information or wish to lodge a complaint you can use the details below to

contact the relevant party. In the event that JHC has been unable to resolve your concerns you can raise the matter with the ICO directly.

Data Protection Officer:
dataprotection@jhc.financial

Data Controller: JHC SYSTEMS LIMITED
Temple Point, 1 Temple Row, Birmingham
B2 5LG, company number 08729370, ICO
registration number ZA049386