

General Data Protection Regulation (GDPR)

and the

Data Protection Bill (to repeal and replace the Data Protection Act, 1998)

Privacy Notice - Employment

Data Controller

Jurupa Resourcing Limited
Riverside, Mountbatten Way, Congleton, Cheshire, CW12 1DY

Person with responsibility for data protection compliance within the Company

Aaron Davies, Founding Director, who can be contacted via email at
adavies@jurupa.co

What information does Jurupa collect?

1. Jurupa Resourcing Limited (Jurupa, the Company) collects and processes personal data relating to its employees to manage the employment relationship. Jurupa is committed to being transparent about how it collects and uses the personal data of employees, and to meeting its data protection obligations.
2. Jurupa collects and processes a range of information about you. This includes -
 - Your name, home address, contact details (including email address and telephone numbers), date of birth, and gender
 - The terms and conditions that apply to your employment with the Company
 - Details of your qualifications, skills, experience
 - Details of your employment history with the Company, and also the start and end dates of previous employments
 - Information about your remuneration, and including information about your entitlement to related benefits eg pension, Child Support Agency, etc
 - Details of the bank account as nominated by you
 - Details of your National Insurance (NI) Number
 - Information about your marital status, next of kin, dependants, and emergency contacts
 - Information about your nationality and entitlement to work in the UK

- Information about your working hours and working pattern with the Company
 - Details about your punctuality and attendance at work with the Company
 - Details of periods of holiday taken by you, and also including any sickness absence, family leave, other authorised absences, and the associated reasons
 - Details of any applicable disciplinary or grievance procedures in which you have been directly involved, including any warnings issued to you, together with related correspondence
 - Assessments of your work performance, including probationary reviews, appraisals, performance reviews and any associated ratings, any applicable performance improvement plans, together with related correspondence
 - Information about medical or health conditions, including whether or not you have a disability that may require the Company to consider making any applicable reasonable adjustments
3. Jurupa collects this information in a variety of ways. For example, data might be collected through your CV, or obtained from your passport or other identity documents (eg driving licence), from forms completed by you at the start of, and throughout, your employment with the Company (eg pension benefit nomination forms), from interviews, meetings or other assessments conducted during your employment with the Company, and from employment-related correspondence with you.

The Company may also collect personal data about you from third parties, but Jurupa will only do this with your prior consent. For example, this will include employment references supplied to the Company by your former employers.

4. Personal data about you will be stored in a number of different places. These include your personal employment file, the Company's general employment-related files, Jurupa's Cloud-based IT operating platform and HR information system and other Company IT systems, and the Company's email system.

Why does Jurupa process personal data?

5. Jurupa needs to process data to enter into an employment contract with you. It also needs to meet its obligations to you under your employment contract. For example, it needs to provide you with an employment contract, to pay you in accordance with your employment contract, and to administer employment-related benefits like your pension.
6. In some cases Jurupa needs to process personal data to ensure it is complying with its legal obligations. For example, it is required to check that you are entitled to work in the UK. The Company also has to deduct all

applicable taxes, to comply with health and safety laws, and to enable every employee to take the periods of holiday that they are entitled to.

7. In other cases, Jurupa has a legitimate interest in processing personal data before, during, and after the end of the employment relationship. Processing employee data allows Jurupa to -
 - Manage external recruitment and internal promotion processes
 - Maintain accurate and up-to-date employment records, including records of contractual and statutory rights and entitlements
 - Maintain accurate and up-to-date contact details, including details of who to contact in an emergency, and/or incident/accident at work
 - Maintain appropriate records of employee relations issues, to ensure the maintenance of acceptable conduct in the workplace
 - Keep records of employee performance, to support career development and related workforce planning processes
 - Keep a record of absence and associated procedures, to support effective workforce management and to ensure that employees receive the correct pay and other related employment benefits
 - Obtain occupational health advice, to ensure the Company fulfils its obligations under health and safety law, and, as appropriate, to individuals with disabilities
 - Keep a record of other types of leave (eg maternity, paternity, parental, etc) to allow effective workforce management, to ensure that the Company complies with all contractual entitlements and statutory rights, and to ensure that employees receive the correct pay and other related employment benefits
 - Ensure effective general HR and employment-related business administration
 - Provide employment, mortgage, tenancy, rental, and credit references enquiries on request for current or former employees
 - Respond to any legitimate statutory disclosure demands (eg HMRC) or other legal claims
8. Some special categories of personal data, such as information about health or medical conditions, is processed by Jurupa to enable the Company to fulfil its employment law obligations eg health and safety, disability, etc

Where Jurupa processes other categories of personal data, such as information about ethnic origin, sexual orientation, or religion or belief, etc, this is done only where it is required to fulfil specific employment rights, and is only collected with the express prior consent of the employee, which can be withdrawn at any time.

Who has access to the data?

9. Your information may be shared internally, including with your Manager, the Director, HR and Payroll colleagues, and IT colleagues where access to the data is necessary for the performance of their job roles.

10. Jurupa shares your data with third parties in order to obtain pre-employment references from other employers. Although not generally applicable, this can also apply in specific circumstances where it is necessary to undertake criminal records checks from the Disclosure and Barring Service, but in such cases this will only be done with the express prior consent of the employee.
11. Jurupa also shares your data with third parties that process data on its behalf. These include the Company's payroll, pension, IT, HR, and occupational health service providers, each for the provision of services required to deliver your entitlements and rights under your Contract of Employment.
12. Jurupa will not normally transfer your data to countries outside the European Economic Area (EEA). In any circumstances where this becomes necessary, the information will be controlled and processed in accordance with the provisions of this Privacy Notice.

How does Jurupa protect data?

13. Jurupa takes the security of HR-related data seriously. The Company uses internal policies and controls to protect personal data against loss, accidental destruction, misuse or disclosure, and to ensure that data is not accessed other than by employees in the proper performance of their duties with Jurupa.
14. Within Jurupa, employment decisions are not based solely on automated decision-making.
15. Where the Company engages third parties to process personal data on its behalf, such parties operate in accordance with the appropriate Jurupa control policies and arrangements, together with a duty of confidentiality, non-disclosure, and an obligation to implement appropriate technical and organisational measures to ensure the security of data.

For how long does Jurupa keep data?

16. Jurupa will hold your personal data for the duration of your employment.
17. Jurupa will hold your personal data after the end of your employment with the Company for the following retention periods -
 - Any applicable regulating statutory periods eg 3 years for accident reports, income tax and NI returns, statutory maternity pay records; 6 years for salary records; and 40 years for prescribed medical records
 - Any recognised best practice guidance where there is no definitive statutory requirement eg The UK Limitation Act's 6-year limit in

relation to contractual claims; 6 years after employment ceases for employment records; and 12 years for pension scheme and pensioner records.

Your individual rights and responsibilities

18. As a data subject, you have a number of rights. You can -
 - Access and obtain a copy of your personal data on request
 - Require the Company to change incorrect or incomplete personal data
 - Require the Company to delete or stop processing your personal data eg where the personal data is no longer necessary for the purposes of processing
 - Object to the processing of your personal data where the Company is relying on its legitimate interests as the legal ground for processing
19. If you want to exercise any of these rights, please contact Aaron Davies, Founding Director, Jurupa, via email at a.davies@jurupa.co
20. If you believe that Jurupa has not complied with your data protection rights, you can complain to the Information Commissioner.
21. You have some obligations under your employment contract to provide Jurupa with data and information. You may have to provide the Company with data in order to exercise your statutory rights eg statutory holiday and other leave entitlements. You are also required to report absences from work, any untoward incidents/accidents/emergencies at work, and information about disciplinary and other matters under the implied duty of good faith.

You are responsible for helping Jurupa to keep your personal data up to date. You should notify the Company if any personal data provided by you to Jurupa changes eg home address, bank details, etc.

Some categories of personal data and information have to be provided to enable Jurupa to enter a contract of employment with you. These types of information include your contact details, your right to work in the UK, your payment details etc. If you do not provide other types of required information it will hinder Jurupa's ability to effectively and efficiently administer its obligations and your rights and entitlements arising as a result of the employment relationship.

Failing to provide the required personal data or information may mean that you are unable to exercise your statutory rights.