

# Compass

## Privacy Notice

Compass is committed to being transparent about how it collects and uses the personal data of its workforce, and to meet its data protection obligations. This notice sets out Compass' commitment to data protection and individual rights and obligations in relation to personal data.

This notice applies to job applicants, current and former employees referred to as HR-related personal data.

### 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 specified, explicit and legitimate purposes.
- Process personal data only where we have the right and need to do so
- Ensure personal data is accurate and take reasonable steps to ensure that inaccurate personal data is rectified or deleted without delay.
- Retain personal data for only for the period necessary for processing.
- Ensure that personal data is secure, and protected against unauthorised or unlawful processing, and accidental loss, destruction or damage.

### Types of data we process

We hold many types of data about you, including but not limited to:

- your personal details including your name, address, date of birth, email address, phone numbers
- your photograph
- gender
- marital status
- dependants, next of kin and their contact numbers
- medical or health information including whether or not you have a disability
- information used for equality, diversity and inclusion monitoring such as your sexual orientation, religion or belief and ethnic origin
- information included in your application for employment including references, education history, employment history and qualifications
- documentation relating to your right to work in the UK
- driving licence
- bank details
- tax codes
- National Insurance number
- current and previous job titles, job descriptions, pay grades, pension entitlement, hours of work and other terms and conditions relating to your employment/engagement with us

- letters of concern, formal warnings and other documentation with regard to any disciplinary proceedings or, in the case of workers, confirmation of other discussions about your conduct
- internal performance information including measurements against targets, formal warnings and related documentation with regard to capability procedures, appraisal forms or, in the case of workers, confirmation of other discussions about your performance
- leave records including annual leave, family leave, sickness absence etc
- details of your criminal record which has been disclosed to us legitimately
- training details

In some cases, we will collect data about you from third parties, such as employment agencies, former employers when gathering references and information from the Disclosure and Barring Service.

Personal data gathered during employment, is held in the individual's personal file, in electronic format and in HR dynamics systems. The periods for which Compass holds HR-related personal data are contained within our Retention of Documents Policy.

Compass will update HR-related personal data promptly if an individual advises that his/her information has changed or is inaccurate.

## **Your rights**

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require Compass to change incorrect or incomplete data;
- require Compass to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- object to the processing of your data where Compass is relying on its legitimate interests as the ground for processing.

## **Criminal conviction data**

We will only collect criminal conviction data where it is appropriate given the nature of your role 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 use criminal conviction data to assess your suitability for employment or continued employment in 'Regulated Activity' and in relation to the nature of your role.

## **Sharing your data**

Your data will be shared with colleagues within Compass where it is necessary for them to undertake their duties. This includes, for example, your line manager for their management of you, the HR department for maintaining personnel records and the payroll department for administering payment under your contract.

We may also share your data with third parties as part of a TUPE transfer or for other reasons to comply with a legal obligation upon us.

### **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.

If Compass discovers that there has been a breach of HR related personal data that poses a risk to the rights and freedoms of individuals, it will report it to the Information Commissioner within 72 hours of the discovery. Compass will record all data breaches regardless of their effect.