

Ethical IT Privacy Policy

Ethical IT is committed to protecting your privacy and complying with the General Data Protection Regulations 2016.

This policy sets out the basis by which we collect, use and disclose the personal data of our prospective, current and former employees, workers, self-employed associates and consultants, and your rights in respect of such personal data. We may update this privacy policy from time to time.

- **personal data** means any data which can identify you directly or indirectly (whether itself or when combined with other data), regardless of the format or media on which the data is stored. This includes data that can identify you when combined with other data that is held separately (pseudonymous data) but does not include data that has been manipulated so that you can no longer be identified from it (anonymous data).
- **processing** means any activity relating to your personal data including collection, use, alteration, storage, disclosure and destruction.

How we collect your personal data

We collect your Personal Data in several ways, for example:

- When you contact us via either telephone or email
- When you apply for a vacancy on our website, via an agency or external jobsite
- When we collect information through the implementation of our HR Policies e.g. Disciplinary & Grievance Policies
- In the general course of managing your employment/engagement with the Company, for example annual reviews, payment processing, contractual changes etc
- Contact details you send us and place on our internal systems and forms
- When we receive your personal data from third parties, for example recruitment agencies and during our pre- employment screening

What type of personal data do we collect?

We may collect the following types of personal data:

- Your name, address, email address, telephone number and other contact information to meet our organisational and statutory obligations to you as your employer
- Details of family members and emergency contact details
- Bank details, national insurance number and any other information required to pay you

- Passport, visa and other right to work documentation and security screening information. Some of the information we collect about you may include Sensitive Personal Data as defined in the GDPR 2016. We will not utilise this data unless we have your consent

Using the personal information we collect

We use your personal data in the following ways:

- The administration of prospective, current and past employees and self-employed workers
- During the recruitment and selection process
- The administration of payroll and invoice payment services
- Pensions administration
- Managing sickness and health related issues
- Disciplinary matters, staff disputes and employment issues
- Staff training and development
- Ensuring staff are appropriately supported in their roles
- Pre – employment screening
- Administration of agencies and other intermediaries
- For assessment and analysis purposes to help improve the operation and performance of the business
- To prevent, detect and prosecute fraud and other crime
- For any other purpose for which you give us your consent to use your personal data
- To comply with our legal obligations e.g. HMRC, pensions.

Who do we share your personal data with?

To perform our contractual and management responsibilities, we may need to share your personal data with one or more third parties e.g. pension providers, financial advisors, financial institutions and HM Revenue & Customs. In such cases, the data will be processed in accordance with the provisions of the GDPR regulations.

We may share your personal data:

- With our employees, agents and/or professional advisors
- With other companies within the group (Ethical Property Company/Jade)
- With other third-party contractors who provide services to us

- Where we are under a legal obligation to share information to comply with employment, tax and immigration law; to prevent fraud and other criminal offences or because of a court order e.g. HRMC, Department for Work and Pensions, the police.

Keeping personal data up-to-date

The Regulations require the company to take reasonable steps to ensure that any personal data it processes is accurate and up-to-date. It is your responsibility to inform the company of any changes to the personal data that you have supplied during your employment or engagement.

The legal basis on which we process your Personal Information

Contract: The personal information we collect from you is processed on the legal basis that processing is necessary for the performance of the contract.

Legitimate interest: As your prospective or current employer or client the Company has a legitimate business interest in processing the personal information submitted by you.

Legal obligation: We have a legal obligation to collect and process information to meet our statutory responsibilities, prevent fraud and other criminal offences or comply with the police or a court order.

Your Rights

You can request a copy of the information that we hold about you at any time by emailing Eit.Admin@ethicalit.net

Please let us know if the information we hold needs updating. You have the right to request correction, deletion or restriction of your personal data where the information is incorrect or there is no valid reason for processing it.

Where is your personal information stored?

All the personal data we use is controlled by the Company in the UK.

It is stored in secure areas within Office 365 and on our cloud based HR Platform, Breathe HR.

All servers are located within the UK

We are Cyber Essentials accredited, and we have an information security regime in place to oversee the effective and secure processing of your personal data.