

## **EMPLOYEE PRIVACY POLICY (Draft)**

This Privacy Policy sets out how we use and protect any information we collect about our employees, job applicants, and candidates to ensure compliance with your rights under the Data Protection Act 1998 and the General Data Protection Regulations. We reserve the right to amend this privacy statement from time to time. You should check this page occasionally to ensure you are happy with any changes made. Except as explained in the statement, we will not release any personal information to a third party under any circumstances unless expressly authorised to do so by you, or if we are obliged to do so by law.

We are registered as a data controller with the UK Information Commissioner's Office and our data protection registration number is **Z6977730**. To find out more about Data Protection, please read our **Data Protection Policy**

In this Privacy Policy the terms "Grwp Llandrillo Menai," "we," "us," and "our" refers to Grwp Llandrillo Menai. and its affiliates and subsidiaries globally.

While this Privacy Policy is intended to describe the broadest range of our information processing activities, those processing activities may be more limited in some jurisdictions based on the restrictions of their laws. For example, the laws of a particular country may limit the types of personal information we can collect or the manner in which we process that information. In those instances, we adjust our internal policies and practices to reflect the requirements of local law.

Grwp Llandrillo Menai is an "exempt charitable body" incorporated since 1993. This means that employees personal information may be used, processed, and transferred to the relevant authorities; HMRC, Pensions, Payroll, etc. for the purposes of maintaining your employment with the Grwp.

The website of Grwp Llandrillo Menai ([www.gllm.ac.uk](http://www.gllm.ac.uk)) or its affiliates and subsidiaries may have separate privacy policies and terms of use that apply to their use. Additionally, some of our products and services may have separate privacy policies and terms of use that apply to their use. Any personal information collected in connection with your use of those websites or products and services are not subject to this Privacy Policy.

If you are unsure how or if this Privacy Policy applies to you, please contact [data@gllm.ac.uk](mailto:data@gllm.ac.uk).

### **Third Party Services**

In some cases, you may provide personal information to third parties that Grwp Llandrillo Menai works with. This could be, for example, a third-party website where you can apply for a job at the Grwp, or can take advantage of services made available to our employees. The use of such third-party websites may be governed by separate terms of use and privacy policies which are not under our

control and are not subject to this Privacy Policy. Please contact such third parties for questions regarding their privacy practices, as well as if you would like to have them delete your personal information.

### **What is Personal Information?**

Personal information, also known as personally identifiable information or personal data, for purposes of this Privacy Policy means any information that (i) directly and clearly identifies an individual, or (ii) can be used in combination with other information to identify an individual.

Personal information does **not** include such information if it is anonymous or if it has been rendered de-identified by removing personal identifiers.

Examples of personal information include:

- An individual's name.
- Employee ID number.
- National Insurance Number
- Home address.
- Home phone number.
- Personal email address.
- Names of family members.
- Date of birth.

### **What is Sensitive Personal Information?**

Sensitive personal information is a subset of personal information that may be more sensitive in nature for the individual concerned.

Examples of sensitive personal information include:

- Race, ethnic information, sexual orientation, political/religious beliefs.
- Social security or other taxpayer/government issued identification numbers.
- Financial information (eg precise salary).
- Health or medical information, including genetic information.
- Criminal records.
- Trade union membership.

### **What Personal Information Do We Collect?**

We collect and maintain different types of personal information about you in accordance with applicable law. Some examples include:

- Name, gender, home address and telephone number, marital status, employee identification number, and emergency contacts (including next of kin).

- Residency and work permit status, nationality and passport information.
- Social security or other taxpayer/government identification number.
- Payroll information, banking details.
- Wage and benefit information.
- Retirement account information.
- Sick pay, Paid Time Off (“**PTO**”), retirement accounts, pensions, insurance and other benefits information
- Information from interviews and phone-screenings you may have had, if any.
- Date of employment, date(s) of promotions(s), work history, technical skills, educational background, professional certifications and registrations, language capabilities, and training records.
- Beneficiary and emergency contact information.
- Forms and information relating to the application for, or in respect of changes to, employee health and welfare benefits; including, short and long term disability, medical and dental care, etc.
- Height, weight and clothing sizes, photograph, videos, physical limitations and special needs.
- Records of work absences, holidays/paid time off, entitlement and requests, salary history and expectations, performance appraisals, letters of appreciation and commendation, and disciplinary and grievance procedures (including monitoring compliance with and enforcing our policies).
- Where permitted by law and applicable we may collect the results of credit and criminal background checks, screening, health certifications, driving license number, vehicle registration and driving history.
- Information required for us to comply with laws, the requests and directions of law enforcement authorities or court orders (e.g, child support and debt payment information).
- Acknowledgements regarding our policies, including employee handbooks, ethics and/or conflicts of interest policies and computer and other corporate resource usage policies.
- Information captured on security systems, including Closed Circuit Television (“**CCTV**”).
- Voicemails, e-mails, correspondence, documents, and other work product and communications created, stored or transmitted using our networks, applications, devices, computers or communications equipment.
- Date of resignation or termination, reason for resignation or termination, information relating to administering termination of employment (e.g. references).
- Letters of offer and acceptance of employment.
- Your resume or CV, cover letter, previous and/or relevant work experience or other experience, education, transcripts, or other information you provide to us in support of an application and/or the application and recruitment process.
- References and interview notes.
- Information relating to any previous applications (within the last twelve months) you may have made to Grwp Llandrillo Menai and/or any previous employment history.

### **How We Collect Your Data**

Generally, we collect personal information directly from you in circumstances where you provide personal information (during the employment process, for example). However, in some instances, the personal information we collect has been inferred about you based on other information you provide us, through your interactions with us, or from third parties. When we collect your personal information from third parties it is either because you have given us express consent to do so, your consent was implied by your actions (e.g. submission of speculative applications or your use of a third-party employee service made available to you by us), or because you provided explicit or implicit consent to the third party to provide the personal information to us.

Where permitted or required by applicable law or regulatory requirements, we may collect personal information about you without your knowledge or consent.

We reserve the right to monitor the use of our premises, equipment, devices, computers, network, applications, software, and similar assets and resources. In the event such monitoring occurs, it may result in the collection of personal information about you. This monitoring may include the use of CCTV cameras in and around our premises.

### **How We Use the Personal Information We Collect**

Grwp Llandrillo Menai may use your personal information in order:

1. To manage all aspects of an employee's employment relationship, including, but not limited to the establishment, maintenance, and termination of employment relationships. Examples of activities related to this include: determining eligibility for initial employment, including the verification of references and qualifications; pay and benefit administration; corporate travel and other reimbursable expenses; development and training; absence monitoring; project management; auditing, compliance, and risk management activities; conflict of interest reporting; employee communications; performance evaluation; disciplinary actions; grievance and internal investigation activities; career management, including the assessment of qualifications for a particular job or task; processing employee work-related claims (e.g., worker compensation, insurance claims); succession planning; relocation assistance; obtaining and maintaining insurance; the provision of employee related services; and other general operations, administrative, financial, and human resources related purposes.
2. Where requested by you, assisting you with obtaining an immigration visa or work permit where required
3. For use in video conferencing.
4. Maintain directories of employees.
5. For employee engagement programs, including surveys.
6. Administer our occupational safety and health programs.
7. To protect the safety and security of our workforce, guests, property, and assets (including controlling and facilitating access to and monitoring activity on and in our premises and activity using our computers, devices, networks, communications and other assets and resources).

8. To investigate and respond to claims against us.
9. To maintain emergency contact and beneficiary details.
10. To comply with applicable laws (e.g. health and safety, employment laws, office of foreign asset controls regulations, tax laws), including judicial or administrative orders regarding individual employees.
11. Carry out any additional purposes that we advise you of (if applicable law requires your express consent for such additional use or disclosure we will obtain it from you).
12. Carry out other purposes as part of our business activities when reasonably required by us (if applicable law requires your express consent for such additional use or disclosure we will obtain it from you).

### **Sharing Personal Information**

Your personal information may be shared, including to our affiliates, subsidiaries, and other third parties, as follows:

1. Where you request us or provide your consent to us.
2. In order to carry out the uses of personal information described above (see, How We Use the Personal Information We Collect).
3. When using or collaborating with third parties in the operation of our business, including in connection with providing many of the benefits and services we offer our employees (e.g., Human Resources Information Systems, wellbeing program service providers, insurance providers). When we share personal information with third parties we typically require that they only use or disclose such personal information in a manner consistent with the use and disclosure provisions of this Privacy Policy and applicable law.
4. We may buy or sell businesses and other assets. In such transactions, employee information is generally one of the transferred business assets and we reserve the right to include your personal information as an asset in any such transfer. Also, in the event that we, or substantially all of our assets, are acquired, your personal information may be one of the transferred assets.
5. Where required by law, by order or requirement of a court, administrative agency, or government tribunal, which includes in response to a lawful request by public authorities, including to meet national security or law enforcement requirements or in response to legal process.
6. If we determine it is necessary or desirable to comply with the law or to protect or defend our rights or property.
7. As necessary to protect the rights, privacy, safety, or property of an identifiable person or group or to detect, prevent or otherwise address fraud, security or technical issues, or to protect against harm to the rights, property or safety of Illumina, our users, applicants, candidates, employees or the public or as otherwise required by law.
8. Where the personal information is public.
9. To seek advice from our lawyers and other professional advisers.
10. To professional advisers (e.g. bankers, lawyers, accountants) and potential buyers and vendors in connection with the disposal or acquisition by use of a business or assets.

11. Like most international businesses, we have centralized certain aspects of our business operations, including for example, financial and human resources administration. This could result in the transfer of personal information from one country to another and amongst our various subsidiaries and affiliates. It should be noted that this may or may not include countries where the level of privacy protection and the legal rights of individuals are not considered commensurate with standards of protection in jurisdictions having comprehensive data protection laws, such as the countries of the European Union.

### **Access to Personal Information We Collect**

You can ask to see the personal information that we hold about you. If you want to review, verify or correct your personal information, please contact [data@gllm.ac.uk](mailto:data@gllm.ac.uk).

When requesting access to your personal information, please note that we may request specific information from you to enable us to confirm your identity and right to access, as well as to search for and provide you with the personal information that we hold about you. We may, in limited circumstances, charge you a fee to access your personal information; however, we will advise you of any fee in advance.

Your right to access the personal information that we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the personal information that we hold about you. In addition, the personal information may have been destroyed, erased or made anonymous. In the event that we cannot provide you with access to your personal information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

### **Correction of Collected Personal Information**

We endeavour to ensure that personal information in our possession is accurate, current and complete. If an individual believes that the personal information about him or her is incorrect, incomplete or outdated, he or she may request the revision or correction of that information. We reserve the right not to change any personal information it considers is accurate.

If it is determined that personal information is inaccurate, incomplete or outdated, we will revise it and, if necessary and use reasonable efforts to inform agents, service providers or other third parties, which were provided with any inaccurate information, so records in their possession may be corrected or updated also.

### **Retention of Collected Information**

Except as otherwise permitted or required by applicable law or regulatory requirements, we may retain your personal information only for as long as we

believe it is necessary to fulfill the purposes for which the personal information was collected (including, for the purpose of meeting any legal, accounting or other reporting requirements or obligations).

You may request that we delete the personal information about you that we hold. There are instances where applicable law or regulatory requirements allow or require us to refuse to delete this personal information. In the event that we cannot delete your personal information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

### **Requests to Access, Delete, or Correct Information**

Please send requests to access, delete, or correct your personal information to [data@gllm.ac.uk](mailto:data@gllm.ac.uk).

Any request by you to us to delete your personal information will not result in deletion of any information submitted by you to a third-party provider. If you require the third-party to delete any of your personal information, you must contact the third party directly to request such deletion.

### **Resolving Concerns**

If you have questions or concerns regarding the handling of your personal information please contact [data@gllm.ac.uk](mailto:data@gllm.ac.uk). Alternatively, you may report concerns or complaints. Details are provided on the Grwp website.

### **Changes to Privacy Policy**

We may change this Privacy Policy at any time. The effective date of each version of this Privacy Policy is identified below.

### **Security of Collected Information**

We are committed to protecting the security of the personal information collected, and we take reasonable physical, electronic, and administrative safeguards to help protect the information from unauthorized or inappropriate access or use.

In compliance with GDPR Principles, Grwp Llandrillo Menai is committed to resolving complaints or concerns you may have about privacy or how your personal information is used (refer to the Requests to Access or Correct Information and Resolving Concerns sections of this Privacy Policy).

If your complaint is not satisfactorily resolved with us directly, you may contact the independent dispute resolution provider at [ico.org.uk](http://ico.org.uk).

