

# THE ARGYLL CLUB

## PRIVACY POLICY

### SCHEDULE 4

Data about our directors and staff, consultants, those on work experience, temporary staff, former directors and staff, next of kin, spouses, beneficiaries

What we collect	Source	We may use your information for the following purposes, based on the following legal grounds	Recipients
<ul style="list-style-type: none"><li>• <b>Contact details (work)</b> such as name, work address, landline/mobile phone or fax numbers, email address.</li><li>• <b>Contact details (personal) and other personal information</b> such as home address, landline/mobile phone number, email address, previous addresses, emergency contact details, date of birth, marital status, next of kin, spouse, beneficiaries' names and contact details.</li></ul>	<ul style="list-style-type: none"><li>• <b>Individual himself or herself</b></li><li>• <b>Recruitment agency</b></li><li>• <b>Referrals</b></li></ul>	<ul style="list-style-type: none"><li>• <b>Necessary for the performance of our contract</b> in our capacity as your employer.</li><li>• <b>Necessary to protect the vital interests of the individual concerned</b> for the purposes of security and prevention of crime.</li><li>• <b>Our legitimate interest in processing such information</b> (work contact details) for contacting individuals where we need to do so in the individual's capacity as employee, director or other member of staff.</li><li>• <b>Our legitimate interest in processing such information</b> (personal contact details) for the purpose of contacting individuals where we need to do so in the individual's capacity as employee, director/shareholder or other member of staff, in order to keep appropriate employment records, for obtaining/verifying evidence of identity or for contacting next of kin, spouses and beneficiaries if the circumstances require (such as in an emergency).</li><li>• <b>Compliance with a legal obligation</b> to comply with right to work legislation.</li></ul>	<p><b>How we share information within the LEO Group</b></p> <ol style="list-style-type: none"><li>1. We may share information about you with any company within the LEO Group for the purposes set out in this Privacy Policy (e.g. to help us provide employee administration services).</li></ol> <p><b>How we share information outside the LEO Group</b></p> <ol style="list-style-type: none"><li>2. Please note that personal information we are holding about you may be shared with and processed by:<ol style="list-style-type: none"><li>2.1 our clients;</li><li>2.2 other professional advisers of our clients;</li><li>2.2 other parties and/or their professional advisers involved during the course of services provided to our clients;</li><li>2.3 other parties and/or their professional advisers involved during the course of services provided to our clients;</li><li>2.4 regulators or other third parties for the purposes of monitoring and/or enforcing our compliance with any legal and regulatory obligations, including statutory or regulatory reporting or the detection or prevention of unlawful acts;</li><li>2.5 credit reference and fraud prevention agencies;</li><li>2.6 any third party in the context of actual or threatened legal proceedings, provided we can do so lawfully (for example in response to a court order);</li><li>2.7 other parties and/or their professional advisers involved in a matter where required as part of the conduct of the services;</li><li>2.8 our own professional advisers and auditors for the purpose of seeking professional advice or to meet our audit responsibilities;</li></ol></li></ol>
<p><b>"Special categories of information" such as:</b></p> <ul style="list-style-type: none"><li>• information about your race or ethnicity, religious beliefs, sexual orientation and political opinions;</li><li>• information about your health, including any medical condition, health and sickness records such as details of any absences (other than holidays) from work including time on statutory parental leave and sick leave;</li><li>• health data relating to your, spouse, children and/ or other family members when added to our private healthcare scheme;</li><li>• information about criminal convictions and offences.</li></ul>		<p>We will use your particularly sensitive personal information in the following ways, and based on the following legal grounds:</p> <ul style="list-style-type: none"><li>• <b>Pursuant to Schedule 1, Part 1(1)(1) of the Data Protection Act 2018</b>, we will use information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws. We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits including statutory maternity pay and statutory sick pay.</li><li>• <b>Pursuant to Schedule 1, Part 2(8) of the Data Protection Act 2018</b>, we may use information about your race or national or ethnic origin, for the purpose of identifying or keeping under review the existence or absence of equality of opportunity or treatment. In accordance with Schedule 1, Part 4, S.35-36 of the Data Protection Act 2018, The Argyll Club retains a policy document and records of processing of such information.</li></ul>	

Updated: 01 September 2019

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		<ul style="list-style-type: none"><li>• Pursuant to Schedule 1, Part 1(1)(1) of the Data Protection Act 2018, we consider and process information about unspent convictions under our rights conferred by law in connection with employment (Exceptions Order to the Rehabilitation of Offenders Act 1974). In accordance with Schedule 1, Part 4, S.35-36 of the Data Protection Act 2018, The Argyll Club retains a policy document and records of processing of such information. We will use information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws. We will also use information to administer benefits including statutory maternity pay, statutory sick pay and pensions.</li><li>• Pursuant to Article 9(2)(h) GDPR, we will use information provided in health questionnaires to assess the working capacity of our employees/other members of staff.</li><li>• We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances we may approach you for your written consent to allow us to process certain particularly sensitive or other personal data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.</li></ul>	<p>2.9 our service providers and agents (including their subcontractors) or third parties which process information on our behalf (e.g. internet service and platform providers, data storage providers, typing service providers, administrative support, third party payroll processors, audit providers and our bank);</p> <p>2.10 third party providers of benefits (such as childcare vouchers, life insurers, pension providers);</p> <p>2.11 another organisation to whom we may transfer our agreement with you or if we sell or buy (or negotiate to sell or buy) our business or any of our assets (provided that adequate protections and safeguard are in place).</p> <p>Please note that special categories of information will only be disclosed as follows (and provided you have consented):</p> <p>2.12 health data may be provided to medical professionals or third-party providers of benefits (such as life insurers)</p>
<ul style="list-style-type: none"><li>• Employment and performance related information such as position/title, date of birth, employment history and CV, references from previous employees, professional specialisms, education and qualifications, salary and benefits, disciplinary records, performance records, appraisals, performance feedback, interview notes, languages spoken, practising certificate details and caveats, professional indemnity information, working patterns (days worked and non-work days).</li></ul>	<ul style="list-style-type: none"><li>• Individual himself or herself</li><li>• Recruitment agency</li><li>• Previous Employers</li><li>• Referral</li></ul>	<ul style="list-style-type: none"><li>• Necessary for the performance of the employment contract in order to keep appropriate employment records and carry out our contractual obligations as employer.</li><li>• Our legitimate interest in processing such information in order to keep appropriate employment records, for assessing their continued suitability for their role and for planning progression.</li></ul>	

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<ul style="list-style-type: none"><li>• <b>Payment and financial information</b> such as bank details, transaction history, salary and benefits, life insurance, pension related information, tax-related information, National Insurance number, payroll documentation (P45 / P60 / P11D).</li></ul>	<ul style="list-style-type: none"><li>• Individual himself or herself</li></ul>	<ul style="list-style-type: none"><li>• <b>Necessary for the performance of the employment contract</b> to pay or compensate the individual.</li><li>• <b>Our legitimate interest in processing such information</b> in order to keep appropriate employment records and to allow the individual to receive pension and other benefits.</li><li>• <b>Consent</b> in order to allow nominated family members or beneficiaries to receive benefits or insurance funds.</li></ul>	
<ul style="list-style-type: none"><li>• <b>Information contained in or provided to us as part of our recruitment or take on process</b> such as details included in copy personal photographs and residential ID documents we receive.</li><li>• <b>Visa documentation</b> (right to work in the UK).</li></ul>	<ul style="list-style-type: none"><li>• Individual himself or herself</li><li>• Recruitment agency</li></ul>	<ul style="list-style-type: none"><li>• <b>Our legitimate interest in processing such information</b> for obtaining/verifying evidence of identity.</li><li>• <b>Compliance with a legal obligation</b> in order to confirm that the individual is entitled to work in the UK and for the purpose of security and prevention of crime.</li></ul>	
<ul style="list-style-type: none"><li>• <b>DBS check</b> (basic disclosure).</li></ul>	<ul style="list-style-type: none"><li>• Third Party Service Provider</li></ul>	<ul style="list-style-type: none"><li>• <b>Compliance with a legal obligation pursuant to Schedule 1, Part 1(1)(1)(a) of the Data Protection Act 2018</b> to satisfy our legal obligations as their employer or as the entity to which members belong and for security and prevention of crime purposes.</li></ul>	
<ul style="list-style-type: none"><li>• <b>Monitoring information</b> such as images via CCTV, entrance/exit dates/times, movement within the relevant building via security card system.</li></ul>	<ul style="list-style-type: none"><li>• Individual himself or herself</li><li>• Building CCTV and access control system</li></ul>	<ul style="list-style-type: none"><li>• <b>Our legitimate interest</b> in maintaining a safe environment and in preventing and detecting crime.</li><li>• <b>Necessary to protect the vital interests of the individual concerned:</b> for security purposes and in order to maintain a safe environment.</li><li>• <b>Compliance with a legal obligation:</b> in order to prevent fraud or money laundering or to comply with any other legal or regulatory requirements.</li></ul>	