



The Flavourworks Group Ltd Privacy Policy

This is an important notice regarding your privacy and the way in which The Flavourworks Group Ltd (referred to as “We” and “Us” in this policy) collects and makes use of your personal data. We want to be open and transparent with you, and therefore encourage you to contact us if you have any questions about this policy or the ways in which we use your personal data.

We take our privacy responsibilities seriously and are committed to protecting and respecting our employees’ privacy.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of applicable privacy legislation, the Data Controller is The Flavourworks Group Ltd of Wincanton Business Park, Murray Way, Wincanton BA9 9RX. Our company registration number is 2341727.

Questions regarding this policy should be directed to our Data Protection Compliance Manager. The Data Protection Compliance Manager is responsible for ensuring compliance with the Act (whilst applicable)], the incoming Regulations and with this policy. That post is held by Andy Keating, 01963 435285, andy@markusproducts.co.uk. Any questions about the operation of this policy or any concerns that the policy has not been followed should be referred in the first instance to the Data Protection Compliance Manager.

1. What information do we collect from or receive about you?

We will collect and process the following data about you:

- **Information you give us:**
 - You will give us information about you during your interview and application stage, when you become an employee of or work for the business and during your employment for example, by providing your CV, contact details, bank details and corresponding with us by phone, e-mail or otherwise;
 - You may also give us special categories of information such as racial or health related information.
- **Information we collect about you:**
 - We will collect information about you during the course of your engagement with us, for example information:
 - From your references;
 - Collected during grievance or disciplinary meetings;
 - On your employee file;
 - Emergency contact information;
 - By our CCTV system;

- Secure entry system.
- **Information we receive from other sources.**
 - We work closely with third parties including service providers in technical, payment and delivery services, IT and infrastructure services and analytics providers. We may receive information about you from these third parties. That information will be covered by this privacy policy.
 - We may be required to carry out right to work checks, fraud protection and criminal background checks. In performing these checks we may receive information from external third party search providers assisting us with these checks.
 - We may receive information from employee benefit providers such as The Peoples Pension our pension provider.
- **Monitoring communications**
 - Monitoring your communications to ensure the interests of the business are protected.

2. How do we use the information?

We use information held about you in the following ways:

- **Information you give to us and we collect about you.** We will use this information:
 - to contact third parties to check your references;
 - to save relevant information on your employment file;
 - to carry out our obligations arising from i) our relationship with you as your employer; ii) any contracts entered into between you and us; and iii) to provide you with the information that you request from us;
 - to contact you or a third party in the event of an emergency;
 - to ensure our offices are secure and access to certain areas is restricted or monitored;
 - to provide third party service providers your details in order they can provide you with services ancillary or complimentary to your employment, for example The Peoples Pension our pension providers, and Aviva our healthcare providers;
 - to notify you about changes to your employment or the business;
 - to provide third party search providers your information in order such providers can assist us with right to work checks, fraud protection and criminal background checks;
 - to contact you if we wish to use your information for a purpose not set out in this policy.
- **Information we receive from other sources.** We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).
- **Monitoring communications.** We will use this information to protect our business interests for example uncovering criminal activity or gross misconduct.

3. Disclosure of your information

We will share your information with the following categories of selected third parties:

- suppliers and sub-contractors for the performance of any contract we enter into with you;
- the third party benefit and service providers which provide services ancillary or complimentary to your employment which you have authorised us to provide your information to;
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation; or to protect the rights, property, or safety of The Flavourworks Group Ltd, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of right to work checks, immigration status, fraud protection and criminal background checks.

4. Basis for processing your personal data

Where we disclose your personal data to third parties

- In certain situations we may ask for your permission before sharing your information with third party services providers. In such situations, we will be relying on your permission for the basis of sharing that information. You have the right to withdraw your permission for us to share your information at any time;
- In other situations, where we collect information about you from third parties (for example, right to work checks), we rely on either a legal right to process that information or our legitimate interests for collecting that information set out in this policy (for example, our legitimate and legal requirement that you have the right to work in the UK).

5. Where we store your personal data

Electronic versions of the information you provide to us or we collect about you is stored on our servers and our HR database which is cloud hosted.

The company which provides this service is PeopleHR. We have confirmed with PeopleHR that your information will be kept securely on the hosted server and not transferred outside of the EEA. We have also taken appropriate measures to ensure our servers are safe and secure including password protecting information stored on the servers and installing antivirus and firewall software.

Paper copies of your information such as your contact details and employment file are stored in locked filing cabinets and a secure archive room.

CCTV images are stored on the local hard drive.

6. How long we will store your personal data for

We store different personal data for different times depending on what the data is and what it is being used for:

- Contact details, emergency contact details, references, right to work checks, disciplinary and grievance correspondence, fraud protection and criminal background checks for the duration of your employment;
- CVs: we have taken a decision at board level in relation to any CVs provided to us and we will store any CV you send us for no longer than 6 months. The reason for keeping CVs for up to 6 months is that your experience is still likely to be relevant for this duration of time.

- Our CCTV systems loop is erased every 3 weeks.
- Legal, accounting & tax and regulatory information: we will keep this information for as long as is required under the legislation requiring us to hold this information.

7. Your rights

You have the following rights in connection with your personal information held by us:

- you may request information on what personal data we hold and access to it;
- you may request we rectify any data we hold about you (i.e. if the data is incorrect), erase that data or restrict the types of processing we carry out in respect of that data;
- you may request we provide you with the personal data we hold about you in order you can use it for your own purposes across other services.

8. Changes to our privacy policy

Any changes we make to our privacy policy in the future will be notified to you via a note on your pay slip and uploaded to PeopleHR. We may change, modify, add or remove portions of this policy at any time, and any changes will become effective immediately, and will apply to personal data collected on or after such date.



Please signify you have read this policy by filling in your details below and signing in the space provided.

Before you sign, if you have not understood any part of this policy or have any questions relating to the policy, please speak to the Data Protection Compliance Manager who will be able to help you with any questions you have.

Name:

Position:

Signature:

Date: