

Internal Privacy Statement

Employees, Contractors and Members

1. Introduction

The Mercers' Company collects and processes personal data relating to its employees, contractors and workers to manage the employment relationship. The Mercers' Company collects and processes personal data relating to its members to manage its relationship with its membership. The Company is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

2. What information does the Company collect?

If you are an employee, contractor or worker the Company collects and processes a range of information about you. This includes:

- your name, address and contact details, email address and telephone number, date of birth, gender, marital status, next of kin, dependants and emergency contacts;
- the terms and conditions of your employment, remuneration, entitlement to benefits;
- details of your qualifications, training, skills, experience and employment history;
- details of your bank account and national insurance number;
- information about your nationality and entitlement to work in the UK;
- details of memberships of professional bodies;
- information about your criminal record;
- details of your work schedule and details of periods of leave taken by you;
- details of any disciplinary or grievance procedures in which you have been involved;
- assessments of your performance, including, performance development reviews (PDRs);
- information about medical or health conditions, including reasonable adjustments;
- EDI information, (your ethnic origin, health, sexual orientation and religion or belief).

If you are a member the Company collects and processes a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number, date of birth and gender, family data, including contact details of your next of kin;
- Current CV, qualifications, skills and experience;
- Special category data, health data, dietary requirements of you and your guests;
- Photographs and CCTV data (see separate CCTV privacy policy for further information)

The Company collects this information in a variety of ways. For example, data is collected through application forms, CVs; your passport or other identity documents; from forms completed by you, from correspondence with you, or through interviews and meetings. In some cases, the Company collects personal data about you from third parties, such as references supplied by former employers and information from criminal records checks permitted by law.

Data is stored in a range of different places, including in your personnel file, in the Company's HR management system, Salesforce and in other IT systems (including the Company's email system). It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Visitors to the Company website

In the course of an individual using the Company website, www.mercers.co.uk we may collect the following personal information:

- Identity data
- Contact Data includes email address.

3. Why does the Company process personal data?

For Employees, Contractors or Workers

The Company needs to process data to enter into an employment contract with you and to meet its obligations under your employment contract or Contract for Service. In some cases, the Company needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check an employee's entitlement to work in the UK, to deduct tax, to comply with health and safety laws, to enable employees to take periods of leave to which they are entitled. For certain positions, it is necessary to carry out criminal records checks to ensure that individuals are permitted to undertake the role in question.

In other cases, the Company has a legitimate interest in processing personal data before, during and after the end of the employment relationship. Processing employee data allows the Company to:

- maintain accurate and up-to-date employment records and contact details (including emergency contacts), and records of employee contractual and statutory rights;
- operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace;
- ensure employees are complying with relevant policies and procedures;
- operate and keep a record of employee performance and related processes, to plan for career development, and for succession planning and workforce management purposes;
- operate and keep a record of leave and / or absence, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled;
- obtain occupational health advice, to ensure that it complies with duties in relation to individuals with disabilities, meet its obligations under health and safety law;
- ensure that employees are receiving the pay or other benefits to which they are entitled;
- ensure effective general HR and business administration;
- provide references on request for current or former employees;
- respond to and defend against legal claims and enforce its legal rights; and
- maintain and promote equality in the workplace.

Some special categories of personal data, such as information about health or medical conditions, or racial or ethnic origin, is processed to carry out employment law obligations (such as those in relation to employees with disabilities, for health and safety purposes and to ensure that employees have the right to work in the UK). Where the Company processes other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is done for the purposes of EDI monitoring. Data that the Company uses for these purposes is anonymised or is collected with the express consent of employees, which can be withdrawn at any time by contacting the HR Director. Employees, Contractors or Workers are entirely free to decide whether to provide such data and there are no consequences of failing to do so.

For Members

If you are member of the Company we will use your personal information in order to provide information and services to you as Member of The Mercers' Company. For certain committee positions, it is necessary to carry out criminal records checks to ensure that individuals are permitted to undertake the role in question.

Website users

For website users we will use your personal information to administer any enquiry that you have submitted.

4. Who has access to data?

For employees, contractors or workers your information will be shared internally, including with members of the HR team, your manager, and / or your head of department, the Clerk and Master and Wardens if access to the data is necessary for performance of their roles. The Company also shares your data with third parties that process data on its behalf, in connection with payroll, the provision of benefits and the provision of occupational health services. The Company will not transfer your data to countries outside the UK.

For Members we may have to share your personal information with members of the executive team if access to the data is necessary for the performance of their role. We may also share your data with external third parties – service providers based in the UK who provide IT and system administration services. In addition the Company may share your personal data with selected third party suppliers, to assist in the provision of services to the Company. These include clothing service providers and catering suppliers.

In certain circumstances where there is expected criminal activity your data may be shared with the policy or necessary government agency.

5. How does the Company protect data?

The Company takes the security of your data seriously and has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties as outlined in the Company's Data Protection Policy. Where the Company engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

6. For how long does the organisation keep data?

The Company will hold employee, contractor or worker personal data for the duration of your employment. The periods for which your data is held after the end of employment are set out relevant retention Schedules which are available for the HR Director.

The Company will hold member personal data for a period of time to fulfil the collection purposes, including satisfying any legal, accounting or reporting requirements.

7. What if you do not provide personal data?

As an employee, contractor or worker you have some obligations under your employment contract to provide the Company with data. Failing to provide the data may mean that you are unable to exercise your statutory rights. If you do not provide the required information, this will hinder the Company's ability to administer the rights and obligations arising as a result of the employment relationship efficiently.

As a *member* you are required to provide certain information, such as contact details, your CV, to enable the Company to provide you with membership services and to participate in Company business. If you do not provide the information, this will hinder the Company's ability to administer the services and entitlements of its members.

8. CCTV

The Mercers' Company processes CCTV footage in adherence to the ICO's CCTV Code of Practice without your consent for our own legitimate business purposes of your safety and security. The CCTV system monitors the exterior of the building and specific areas internally 24 hours a day primarily for the security of our staff, residents and Company assets. This data is recorded and retained for 90 days unless the data is being used to investigate an alleged incident or crime. We reserve the right to review the data recorded on our CCTV system for the following purposes (this list is not exhaustive):

- (a) To comply with any legal obligations;
- (b) To assist in the investigation of wrongful acts; and
- (b) To ensure that employees, residents and other legitimate users of the Hall, Officers, almshouse and sheltered housing schemes are complying with our policies and procedures.

We provide view-only access to CCTV footage for third parties that provide security patrols around our properties. CCTV recordings are stored securely in controlled premises.

9. 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 the Company to change incorrect or incomplete data;
- require the Company to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where the Company is relying on its legitimate interests as the legal ground for processing; and
- ask the Company to stop processing data for a period if data is inaccurate or there is a dispute about whether your interests override the organisation's legitimate grounds for processing data.

If you have any queries regarding this privacy statement or would like to exercise any of these rights, please contact the **Company's Data Compliance Manager:**

Chris Whyte Principal Staff Officer

Chrisw@mercercs.co.uk

0207 726 4991

You can make a subject access request by contacting the Company's Data Compliance Manager.

If you believe that the Company has not complied with your data protection rights, you can complain to the [Information Commissioner](#).