

Care4Calais Employee and Volunteer Privacy Notice

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1. INTRODUCTION

- 1.1 In this Privacy Notice, the terms "**Care4Calais**", "**we**", "**us**" and "**our**" are references to Care4Calais. Care4Calais will be the data controller of your personal data. In all circumstances, your personal data will only be processed in accordance with this Privacy Notice; please read it carefully. It is intended to comply with our obligations to provide you with information about Care4Calais' processing of your personal data under privacy laws including the UK GDPR. It does not form part of your contract of employment or engagement.
- 1.2 We hold and process data on all current and former staff, applicants and volunteers ("**staff**" or "**you**" or "**your**"), and third parties whose information you provide to us in connection with the employment or other working relationship (e.g., next-of-kin, emergency contact information and/or dependents).
- 1.3 If you have any questions about this Privacy Notice or would like to access the information it contains in a different format please contact alexander@care4calais.org

2. WHAT DATA DO WE PROCESS?

- 2.1 Care4Calais collects and processes your personal data. Personal data means any information describing or relating to an identified or identifiable individual.
- 2.2 We collect various types of personal data about you including (but not exclusively):
- Personal contact details such as your title, name, home address, mobile number and e-mail address;
 - Your gender, date of birth, marital status and national insurance number;
 - A copy of your passport or other photographic identification, nationality, and eligibility to work information;
 - Next-of-kin/emergency contact information, and details of any disability;
 - CV and application records, background checks, contract of employment, work contact details, your appraisals and performance review information, data relating to training and development, complaints and investigations, incident reports, system and building login and access records, data caught by IT security programmes and filters;
 - Other personal data which you choose to disclose to us, and informal data generated in the course of your engagement relating to the administration or management of our relationship with you.
- 2.3 Certain additional information will sometimes be collected where this is necessary and permitted by applicable laws.

3. SPECIAL CATEGORIES OF DATA

- 3.1 To the extent permitted by applicable laws Care4Calais collects and processes a limited amount of personal data falling into special categories, sometimes called "special category personal data". This term means information relating to racial or ethnic origin; political opinions; religious or philosophical beliefs; physical or mental health (including details of accommodations or adjustments); trade union membership; sex life or sexual orientation; biometric and genetic data; and criminal records and information regarding criminal offences or proceedings.

4. HOW DOES THE COMPANY COLLECT DATA?

- 4.1 **Directly** – Care4Calais collects and records your personal data from a variety of sources, but mainly directly from you. In addition, further information about you will come from your managers or HR or occasionally your colleagues.
- 4.2 **Third parties** - We also obtain some information from third parties: for example, information from tax authorities (where permitted by applicable law).

5. FAILURE TO PROVIDE INFORMATION

- 5.1 Where we ask you to provide personal data to us on a mandatory basis, we will inform you of this at the time of collection. Failure to provide any mandatory information will mean that we cannot carry out certain HR processes. For example, if you do not provide us with your bank details, we will not be able to pay you. In some cases, it may mean that we are unable to continue with your employment as we will not have the personal data we believe to be necessary for the effective and efficient administration and management of our relationship with you.

6. WHAT ARE THE PURPOSES FOR WHICH DATA ARE PROCESSED?

- 6.1 Your personal data are collected and processed for business purposes, in accordance with applicable laws. We collect and process your personal data for purposes including:
- i) recruitment;
 - ii) operating email, IT, internet, social media, HR related and other company policies and procedures;
 - iii) protecting the private, confidential and proprietary information of Care4Calais, its employees, its service users and third parties, (iv) complying with applicable laws and regulation;
 - iv) for service operations and reporting;
 - v) to operate relationships with third party service partners;
 - vi) where relevant for publishing appropriate internal or external communications
 - vii) to support HR administration and management;
 - viii) to enforce our legal rights and obligations; and
 - ix) for other purposes permitted by applicable laws, including legitimate interests pursued by us where these are not overridden by the interests or fundamental rights and freedoms of

staff and where these have been explained to you before the relevant data is collected or the processing is carried out.

6.2 Special categories of data may be collected and processed by Care4Calais for the following purposes:

- i) documentation needed to review eligibility to work for Care4Calais;
- ii) your racial or ethnic origin, religion, philosophical or political belief, sexual orientation or disability status for the collection of statistical data subject to applicable laws;
- iii) health and medical information which may be used to comply with employment, health and safety or social security laws; and
- iv) some special category information may be used in the event of a complaint.

7. LEGAL BASES FOR PROCESSING

7.1 Personal data

Whenever Care4Calais processes your personal data, we do so on the basis of a lawful condition for processing. In the majority of cases, the processing of your personal data will be justified on one of the following bases:

- (i) compliance with a legal obligation (for example, disclosing information to HMRC);
- (ii) performance of a contract (e.g. your employment contract);
- (iii) legitimate interests of Care4Calais except where such interests are overridden by your interests or fundamental rights and freedoms;
- (iv) consent (for example if you ask us to provide pay information to a bank for a mortgage application made by you). We will rarely rely on consent as a legal basis and if we do, we will make this clear at the time.

7.2 Special categories of data

Where we process special categories of data it will be justified by one of the following additional conditions:

- (i) obligations in the field of employment law;
- (ii) the purposes of preventive or occupational medicine, for the assessment of your working capacity, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services, to the extent permitted by applicable laws;
- (iii) to protect your vital interests (for example in exceptional emergency situations);
- (iv) the establishment, exercise or defence of legal claims; or
- (v) to your explicit consent (you should be aware that it is not a condition or requirement of your employment to agree to any request for consent).

7.3 Processing data relating to criminal convictions and offences

Personal data relating to criminal convictions and offences will only be processed where authorised by applicable laws, for example a criminal record check or an allegation of a criminal offence or conviction.

8. RETENTION OF PERSONAL DATA

Our general approach is to only retain personal data for as long as is required to satisfy the purpose for which it was collected by us or provided by you. This will usually be the period of your employment with us plus the length of any applicable statutory limitation period following your departure, although some data, such as pension information, may need to be kept for longer.

9. DISCLOSURES OF PERSONAL DATA

- 9.1 **Internally** - your personal data can be accessed by or will be disclosed internally on a need-to-know basis to HR personnel, management personnel, and system administrators.
- 9.2 **Public** - your name, location, job title, contact information and any published skills and experience profile may also be accessible to other employees and on the Care4Calais website.
- 9.3 **Third parties** - your personal data will be accessed by third parties whom we work together with for providing us with services. Examples include: tax authorities, regulatory authorities, IT administrators, lawyers and other professional advisors, and payroll providers.

10. SECURITY OF DATA

- 10.1 We are committed to protecting the security of the personal data you share with us. In support of this commitment, we have implemented technical, physical and organisational measures to ensure a level of security appropriate to the risk. Measures we employ include use of Multi Factor Authentication on any applications or systems where personal data may be stored and enforcement of strong passwords for all users accounts.

11. YOUR RIGHTS AS A DATA SUBJECT

- 11.1 You have the following rights regarding your personal data under data protection laws:
 - (i) Right to access, correct and delete your personal data;
 - (ii) Right to request your data in a structured, commonly used and machine-readable format;
 - (iii) Right to restriction of processing where you contest the accuracy of the personal data, where the processing is unlawful but you do not want us to erase the data or where we no longer need the personal data for the purposes of the processing, but you require them for the establishment, exercise or defence of legal claims;
 - (iv) Right to withdraw consent;
 - (v) Right to object to processing justified on legitimate interest grounds; and
 - (vi) Right to complain to a supervisory authority (the Information Commissioner's Office in the UK) if you consider that the processing of your personal data infringes applicable law.

- 11.2 For further information regarding your rights, or to exercise any of your rights or submit an internal complaint about the way in which we handle your personal data, please contact alexander@care4calais.org.

12. NOTICE OF CHANGES

- 12.1 Care4Calais may change or update this Employee and Volunteer Privacy Notice at any time.
- 12.2 Should we change our approach to data protection, you will be informed of these changes or made aware that we have updated the Privacy Notice so that you know which information we process and how we use this information.
- 12.3 This Employee and Volunteer Privacy Notice was last updated and reviewed on 1 February 2023.