

CEI Global UK Limited

Privacy Notice for employees, workers and contractors

CEI Global UK Limited ('CEI' or 'we'), as a 'data controller', collects and processes personal data relating to its employees, workers and contractors to manage the employment/worker/contractor relationship. CEI is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations in accordance with the General Data Protection Regulations (GDPR).

This notice applies to current and former employees, workers and contractors. This notice does not form part of any contract of employment or other contract to provide services.

It is important that you read and retain this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information and what your rights are under the GDPR.

What information does CEI collect?

CEI may collect, process and store the following categories of personal information about you:

- your name, address and contact details, including email address and telephone number, date of birth and gender;
- occupational health records including details relating to Occupational Medical Assessments, medical history, medical conditions—past & present, and details relating to your GP, and doctors or consultants that you may be/ have been in the care of.
- training records including competencies, qualifications, certificates and accreditations
- recruitment selection or development surveys/questionnaires, pre-employment checks including CV and references, offer letter and other information which is part of the application process. Driving licence details and where applicable, penalty points and/or disqualifications.
- the terms and conditions of your employment;
- details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with CEI;
- information about your remuneration, including entitlement to benefits such as pensions or insurance cover and other flexible benefits as appropriate;
- details of your bank account and national insurance number, payroll records and tax status information including information received from HMRC;
- information about your marital status, next of kin, dependants and emergency contacts including their personal data such as home address, employer's address, contact details, birth certificates, passports etc;
- information about your nationality and entitlement to work in the UK including information received from the UK Border Agency and/or the Home Office;
- information about your criminal record: criminal convictions, cautions or offences;
- details of your schedule (days of work and working hours), location of workplace and attendance at work including CCTV footage, swipe card records and biometric data including finger print scanning;
- employment records (including job titles, work history, working hours, holidays, training records and professional memberships)
- staff photographs;
- information about your use of our information and communications systems;
- details of periods of leave taken by you, including holiday, sickness absence, family leave and sabbaticals, and the reasons for the leave;
- details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence;
- assessments of your performance, including appraisals, performance reviews and ratings, performance improvement plans and related correspondence;
- information about medical or health conditions, including whether or not you have a disability for which CEI needs to make reasonable adjustments;
- trade union membership; and
- equal opportunities monitoring information including information about your ethnic origin, sexual orientation and religion or belief and any other personal data referring to protected characteristics

How is your personal data collected?

CEI may collect the categories of information listed above in a variety of ways. For example, data might be collected through employment agencies, application forms, CVs or resumes; obtained from your passport or other identity documents such as your driving licence; from forms completed by you at the start of or during employment (such as benefit nomination forms); from correspondence with you; or through interviews, meetings or other assessments.

In some cases, CEI may collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers, information from credit reference agencies and information from criminal records checks where they are permitted by law.

Data will be stored in a range of different places, including in your personnel file, in CEI's HR management systems and in other IT systems (including CEI's email system).

Why does CEI process personal data?

CEI needs to process all the categories of data in the list above primarily to enter into an employment contract with you and to meet its obligations under your employment contract. For example, it needs to process your data to provide you with an employment contract, to pay you in accordance with your employment contract and to administer benefit, pension and insurance entitlements.

In some cases, CEI 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 and to enable employees to take periods of leave to which they are entitled.

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

- check you are legally entitled to work in the UK;
- run recruitment and promotion processes;
- maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency), and records of employee contractual and statutory rights;
- pay you and, if you are an employee or deemed employee for tax purposes, deducting tax and National Insurance contributions (NICs)
- operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace;
- operate and keep a record of employee performance and related processes, to plan for career development, and for succession planning and workforce management purposes;
- enrol you in a pension arrangement in accordance with our statutory automatic enrolment duties.
- make decisions about salary reviews and compensation
- fulfil education, training and development requirements
- operate and keep a record of absence and absence management procedures, 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 and ensuring CEI makes provisions where necessary for reasonable adjustment, meet its obligations under health and safety law, ensures you are able to carry out the duties of your role, and ensure that employees are receiving the pay or other benefits to which they are entitled;
- operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to allow effective workforce management, to ensure that CEI complies with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled;
- ensure effective general HR and business administration;
- to monitor use of our information and communication systems to ensure compliance with our IT policies
- equal opportunities monitoring
- provide references on request for current or former employees; and
- respond to and defend against legal claims.
- monitor staff locations & whereabouts in order to meet fire safety regulations, health & safety compliance, and to pay you accurately for the work you do.

Some of the above grounds for processing will overlap and there may be several grounds which justify CEI's use of your personal information.

We will not use your personal information for purposes other than that for which it was collected, unless we reasonably consider that this is required, and the reason is compatible with the original purpose. If we need to use it for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so. Please be aware that we may process your personal information without your knowledge or consent, in compliance with the above, where it is required or permitted by law.

The legal basis on which we will process your personal information is to carry out our obligations under employment law, equality laws, Health & Safety laws and to protect your vital interests.

Particularly Sensitive Personal Data

Some special categories of personal data, such as information about physical or mental health or disability, is processed to ensure your health and safety in the workplace and to assess your fitness to work, to provide workplace adjustments, to monitor and manage sickness absence and to administer benefits.

Where CEI processes other special categories of personal data, such as information about ethnic origin, sexual orientation or religion or belief, this is done for the purposes of equal opportunities monitoring. This is to carry out its obligations and exercise specific rights in relation to employment.

Other than the occasions set out below, we will never process particularly sensitive personal data without your specific consent to do so.

Very occasionally, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests, or someone else's and you are not capable of giving your consent or you have already made the information public.

Who has access to data?

Your information may be shared internally, including with members of the HR and recruitment team (including payroll), your line manager, managers in the business area in which you work and IT staff if access to the data is necessary for performance of their roles.

CEI will share personal data with other entities in our group as part of our regular reporting activities on company performance, in the context of business reorganisation or group restructuring exercise, and for system maintenance support and hosting of data.

CEI shares your data with third parties in order to obtain pre-employment references from other employers and to obtain employment background checks from third-party providers. CEI may also share your data with third parties in the context of a sale of some or all of its business. In those circumstances the data will be subject to confidentiality arrangements.

CEI also shares your data with third parties that process data on its behalf, in connection with payroll, the provision of benefits, the provision of occupational health services, travel and for compliance purposes. We may also be required to share a limited amount of your personal data with our clients or main contractors for the purposes of site health & safety, occupational health monitoring, training & competency assessment or other contractual project requirements.

All third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We will not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

We may process your data upon request, in order to provide a reference to a prospective employer of yours. In order to perform our contract with you, the Company may transfer your data outside of the EEA, namely to the following countries:

- Australia
- Singapore

There are no adequacy decisions by the European Commission in respect of those countries at this time. This means that the countries to which we transfer your data are not deemed to provide an adequate level of protection for your personal information.

To ensure that your personal information does receive an adequate level of protection we adhere to an Intra-Company Data Transfer and Security Agreement, to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection.

If you require further information about this protective measure, you can request it from your manager.

How does CEI protect data?

CEI takes the security of your data seriously. CEI 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.

In addition, we will limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. Where CEI 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.

For how long does CEI keep data?

We will only retain your personal information for as long as is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. CEI will hold your personal data at least for the duration of your employment however, to determine the specific appropriate retention period for personal data, we will consider the amount, nature and sensitivity of the

personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purpose for which we process your personal data and whether we can achieve those purposes through other means and the applicable legal requirements. The retention periods which we have determined are as follows:

Type	Retention of data
Recruitment & potential candidates	Up to a maximum of 2 years after the application
Agency Workers & Third-Party Workers	Up to 5 years after the termination of worker agreement
Sub Contractors	Up to 10 years after the termination of the contract for service agreement
PAYE staff (including individuals associated to them)	Up to 40 years after the termination of the contract of employment

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 CEI to change incorrect or incomplete data;
- require CEI 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 CEI is relying on its legitimate interests as the legal ground for processing;
- request that CEI suspend processing of your data for example, if you want us to establish its accuracy or the reason for its processing it; or
- request that we transfer your personal information to another party.

If you would like to exercise any of these rights, please email info@ceiglobal.org. If you believe that CEI has not complied with your data protection rights, you can complain to the Information Commissioner.

What if you do not provide personal data?

You have some obligations under your employment contract to provide CEI with data. In particular you are required to report absences from work and may be required to provide information about disciplinary or other matters under the implied duty of good faith. You may also have to provide CEI with data in order to exercise your statutory rights, such as in relation to statutory leave entitlements. Failing to provide the data may mean that you are unable to exercise your statutory rights.

Certain information, such as contact details, your right to work in the UK and payment details, must be provided to enable CEI enter a contract of employment with you. If you do not provide other information, this will hinder CEI ability to administer the rights and obligations arising as a result of the employment relationship efficiently.

Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention, and this type of processing is only permissible in specified circumstances. Within CEI, employment decisions are not based solely on automated decision-making.

Changes to this privacy notice

We reserve the right to update this notice at any time, and we will provide you with a new notice when we make updates. We may also notify you from time to time in other ways about the processing of your personal data. If you have any questions at all about this privacy notice, please contact info@ceiglobal.org.

I, _____ (employee/worker/contractor name), acknowledge that on _____ (date), I received a copy of CEI privacy notice for employees, workers and contractors and that I have read and understood it.

.....
Signature

.....
Name