



THE PHEASANT PRIVACY NOTICE –July 2022

WHO WE ARE

This Notice tells you what to expect in relation to personal information about you which is collected, handled and processed by The Pheasant Hotel Ltd, Mill Street, Harome, Helmsley, YO62 5JG (“The Pheasant” or “We”) as Data Controller.

We are committed to protecting your data and respecting your privacy.

We aim to be clear when we collect your data and not do anything you wouldn’t reasonably expect with your data. We handle and process data in accordance with the UK GDPR, the Data Protection Act 2018, the Privacy and Electronic Communications Regulations 2003 and, where applicable the GDPR.

INFORMATION WE MAY COLLECT

You give us information when you apply for a job; complete an application form or submit a CV; attend an interview; accept a job offer and provide details for your contract of employment and to enable us to pay you; for general administrative purposes or when you complete an employee survey or form. This information may be provided in person or via a form, phone, email or online; or by communicating with us via any other channel.

The information about you that we may collect, hold and process may include:

- Name and contact information including postal addresses, email addresses and phone numbers
- National Insurance numbers or other national government identifiers
- Date of birth
- Gender
- Financial account information such as bank account details and payroll information
- Pension and Insurance enrolment information
- Health, fitness, medical and genetic information
- Drug and alcohol testing information
- Finger print
- ID documentation including birth certificate, passport, driving licence or work permit information
- Proof to work in the UK
- Personal records
- Marital status, dependants and beneficiaries
- Next of kin and emergency contact information
- Salary, annual leave and benefit information
- Compensation history
- Performance information
- Disciplinary and grievance information, where applicable
- Start date and job title
- Location of employment
- Education and training qualifications, skills, experience and employment history
- Employment records (including professional memberships, references, work history, and proof of work eligibility)
- Photograph and video
- IP address
- Location details

- Other personal details included in a CV or cover letter or that you have otherwise voluntarily provided
- Information gathered by employee monitoring and (where applicable) CCTV footage

The sensitive personal information that we may also collect includes:

- Racial or ethnic origin
- Political opinions
- Religious and philosophical beliefs
- Trade union membership
- Health and disability
- Sex life, sexual orientation or gender reassignment
- Genetic and biometric data
- Pregnancy and maternity

We may collect information about you from third parties such as:

- Recruitment and employment agencies
- HMRC
- DVLA
- NHS
- Government contact tracing service
- Previous employers and referees provided to us by you
- Disclosure and Barring Service
- Medical professionals or occupational health
- Training providers
- Public sources such as LinkedIn, Facebook and other social media platforms

We keep a record of the emails sent between you and The Pheasant.

We may monitor or record calls for commercial, security and training purposes and to improve our business processes.

Your image may be recorded by CCTV at any of our sites for safety and security purposes and for disciplinary purposes. This footage may also be used to exercise and defend our legal rights. Where necessary this footage will also be shared with the authorities for law enforcement purposes.

HOW WE USE YOUR INFORMATION

The above information is used for:

- Administration and management of the employment contract and relationship
- Payroll, pension and benefits administration
- Company financial audits
- Background checks
- Insurance
- Performance reviews and evaluations
- Training and development
- Investigating grievances and disciplinary matters
- Monitoring employee activities
- Entry identification and time recording
- Compliance with applicable laws, court orders or other legal or tax requirements
- Compliance with Government guidance for public health reasons
- allowing us to make reasonable adjustments in respect of any disability or health condition you have informed us of
- Allowing us to monitor the effectiveness of our equal opportunities policy

- Management of travel, accommodation and insurance on your behalf
- Notify you of Group Company offers
- Obtain government or other third-party funding and apply the apprenticeship levy
- Performance of the employment contract including
 - Obligations required by law and HMRC
 - Management
 - Planning and organisation of work
 - Equality and diversity in the workplace
 - Health and safety
 - Protection of employer or customer property
 - Rights and benefits related to employment
 - Disciplinary and termination

During the performance of your duties as an employee The Pheasant may from time to time create images and/or audio-visual footages of you for the following purposes:

- Safety and security purposes;
- Promotional, marketing and commercial purposes;
- Training for The Pheasant employees and third parties who work with The Pheasant.

HOW WE KEEP YOUR INFORMATION SAFE

All personal information we hold is stored on our secured servers in the UK and EU.

Access to our information is strictly controlled. We may disclose your details to police, regulatory bodies, local authorities or legal and professional advisors, auditors and insurers if so required. If any of the organisations to which we disclose your personal information is situated outside the UK we would take reasonable steps to ensure that your information is properly protected including safeguards such as using contractual provisions to ensure your information is properly protected.

DISCLOSURE OF YOUR INFORMATION

We do not share your information with any third party without your agreement unless we are under a duty to disclose or share your personal data in order to comply with any legal, regulatory or tax obligation, or in order to enforce or apply our terms the employment contract; or to protect the rights, property, or safety of The Pheasant or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection.

We will share your information with future employers on your request.

Any third-party providers used by us to fulfil our contractual obligations to you will only collect, use, store and disclose your information in the manner and to the extent necessary for them to provide their services to us. We have written agreements in place with each third party to ensure that your information is kept securely, is not used for any other purpose and is deleted when no longer required.

Such third-party providers may include:

- Payroll Company
- Pension company
- Travel and accommodation booking services
- Training providers
- Funding providers
- HMRC
- Department of Work & Pensions
- HSE
- Professional advisors and insurers

We may share personal information with other organisations such as the Office for National Statistics for compliance purposes, research, reporting and improvement of strategic planning and business decisions or funding.

We never sell personal information to third parties.

WHAT IS THE LEGAL BASIS FOR PROCESING THE INFORMATION

The legal basis for collecting and processing your data may be:

- **Consent** – you may have given us your consent to use your data. You can withdraw your consent at any time.
- **Contract** – we need certain personal information (including financial information) to enter into and administrate the employment contract.
- **Legal obligation** – if required by law to process personal information for example to comply with employment, social security or social protection law, health and safety and equality obligations, to provide information to the police to prevent fraud or criminal activity and to comply with our HMRC obligations.
- **Legitimate interest** – for a genuine business reason that does not override your rights, freedom or interests for example administrative purposes.
- **Vital interest** - to protect another person's vital interest.
- **Public task** - for carrying out or complying with public functions or for public interest for example to comply with COVID-19 measures put in place by the Government of Local Authority.

YOUR RIGHTS

You have the right at any time to ask for a copy of the information we hold about you and confirmation of how it is being processed. You will be required to verify your identity when making a request. If you would like to make a request for information, please:

Email - data@rockliffehall.com or send a request in writing to **Data Protection Officer, Rockliffe Hall Limited, Rockliffe Hall, Hurworth on Tees, Darlington, DU2 2DU.**

You also have the right to:

- request that we **correct inaccuracies** to your information or complete your information if incomplete. You must notify us of any updates, amendments or corrections to previously collected personal information in writing to HR. This can be via email. We require you to keep the personal information we hold on you up to date and accurate;
- request that we **delete some or all of your personal information** for example if it is no longer necessary for us to hold it for the purpose it was provided and we have no legal basis to retain it;
- request that we **stop or limit the processing** of your information where you think the information, we hold is inaccurate (until the accuracy is proved or updated); if you have objected to the processing (when it was necessary for legitimate interests); if you have consented to the use of it; or if it is no longer necessary for us to hold it for the purpose it was provided and we have no legal basis to retain it;
- (in certain circumstances) **move, copy or transfer your personal information** to another organisation or to yourself. This applies only to personal information you have provided us with and is being processed by us with your consent or for performance of a contract and is processed automatically;
- (in certain circumstances) you have the right to **object to certain types of processing** of your personal information when it is based on legitimate interests, when it is processed for direct marketing including profiling, or when it is processed for the purpose of statistics.

HOW LONG DO WE KEEP YOUR INFORMATION?

Your personal information will be retained for no longer than is necessary to fulfil the purpose for which we collected it or as required to satisfy any legal or reporting obligation or to resolve a dispute or enforce an agreement.

When We no longer require your personal information, we will dispose of it in line with approved company processes. If personal data is retained for legal or reporting obligations it will be archived and reduced to the minimum information required.

WITHDRAWING CONSENT

If you have provided us with your consent to process your personal information you have the right to withdraw this at any time. In order to do so you should contact us by emailing data@rockliffehall.com

CONTACT US

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us by contacting:

**Data Protection Officer
Rockliffe Hall Limited
Rockliffe Hall
Hurworth on Tees
Darlington
DL2 2DU**

data@rockliffehall.com

You also have the right to contact the Information Commissioners Office at <https://ico.org.uk/concerns/>

CHANGES TO THIS NOTICE

Our policies are constantly under review and this Privacy Notice may be changed by us at any time. Any significant changes shall be notified to you.