



GOLDEN LEAVES EMPLOYEE PRIVACY POLICY

In this Privacy Statement the terms, 'we' or 'us' refers to Golden Leaves Ltd.

Your privacy is important to us, and we are committed to keeping your information secure and managing it in accordance with our legal responsibilities under applicable data protection laws. Golden Leaves Ltd are registered with the Information Commissioner's Office (ICO) as a data controller.

This Privacy Statement sets out the basis upon which we will process personal information we collect from you when you apply for a job with us or through your employment with us.

Please read this Privacy Statement carefully as it contains important information to help you understand our practices regarding any personal information that you give to us.

What Information We Collect

We may collect personal information including: your name, address including address history, telephone number, email address, date of birth, National Insurance number, employment history, passport information, driving licence information, bank details, credit history, information regarding your emergency contacts, qualifications, training and competency records, identifiers assigned to your computer or other internet connected device including your IP addresses and information linked to any work mobile telephone number provided to you and your partial fingerprint in the Bio Time system.

We will collect special categories of personal data (e.g. health information regarding a disability, illness or impairment) (See section of Special Categories of Personal Data below for further details).

How We Collect Your Information

We may collect information provided in connection with the following activities:

- if you register interest in a job vacancy with us;
- where you provide information to us on our Website, in an interview, in writing or over the phone.
- where information is provided to us from third parties including credit reference agencies, criminal records checks, your former employers, tax authorities, fraud prevention agencies, providers of the flexible benefits you opt for;
- in notes of one to one meetings, performance assessments and discussions with your line manager;
- building access and IT systems access records;
- attendance records for training and meetings you participate in.

Use of Your Information

Your information will be used by us in connection with the purposes detailed below.

PURPOSE	LEGAL BASIS
Recruitment	
To manage job applications and assess candidates for vacancies with the Company	<ul style="list-style-type: none"> Legitimate interests for recruitment purposes
To conduct background checks, including verifying identity and address, validating education, certificates and qualifications, obtaining references, credit reference and criminal records checks and evidence of gaps in employment.	<ul style="list-style-type: none"> Legitimate interests to manage and control employee risk
To obtain evidence of eligibility to work in the UK	<ul style="list-style-type: none"> To comply with legal obligations in the Immigration Act
To assess suitability and capability of candidates, including psychometric assessments for certain roles	<ul style="list-style-type: none"> Legitimate interests for recruitment purposes If special categories of personal data are processed – necessary for the purpose of preventative or occupational medicine for the assessment of working capacity
To document the interview process and assess candidate competence	<ul style="list-style-type: none"> Legitimate interests for recruitment purposes If special categories of personal data are processed – necessary for the purpose of carrying out obligations and exercising specific rights in the field of employment or for the purposes of preventative or occupational medicine for the assessment of working capacity
During Your Employment	
To process payroll and pay out of pocket expenses, a record is kept of employees' bank details, National Insurance numbers and taxation records	<ul style="list-style-type: none"> Necessary to perform the contract of employment

To manage absence, both planned and unplanned and validate fitness and ability to return to work	<ul style="list-style-type: none"> • Legitimate interests for absence management • Necessary for the purpose of carrying out obligations and exercising specific rights in the field of employment or for the purposes of preventative or occupational medicine for the assessment of working capacity
For training purposes and to enhance or review performance	<ul style="list-style-type: none"> • Legitimate interests for performance management • To comply with statutory obligations for certain roles and other professional bodies' requirements
To provide flexible benefits as part of the employee benefits package	<ul style="list-style-type: none"> • Necessary to perform the contract for the optional benefits selected
To provide hotel accommodation, company or hire cars where applicable	<ul style="list-style-type: none"> • Legitimate interests to facilitate travel for business purposes
Security	
To monitor access to the Company's offices and restricted areas, and to IT systems and applications	<ul style="list-style-type: none"> • Legitimate interests to manage and control information security risk • To comply with legal obligations for prevention of financial crime
For contacting employees or their representatives in the event of an emergency	<ul style="list-style-type: none"> • Legitimate interests for business continuity
Complying with Legal Obligations	
To prevent, investigate and prosecute crime, fraud and money laundering;	<ul style="list-style-type: none"> • To comply with legal obligations for prevention of financial crime and money laundering
For auditing purposes;	<ul style="list-style-type: none"> • To comply with legal obligations to conduct audits
If we are obliged to disclose information by reason of any law, regulation or court order;	<ul style="list-style-type: none"> • To comply with legal obligations

Other	
To transfer information to any entity which may acquire rights in us;	<ul style="list-style-type: none"> Legitimate interests for commercial interests
For any other purpose to which you agree.	<ul style="list-style-type: none"> With your consent

Where we or third parties (see below) process your personal information, it will be processed:

- Because we or they need to do so as a direct consequence of fulfilling your request (for example, to check your identity in order to consider you for a job);
- To comply with applicable laws or regulations, or as permitted by applicable law; or
- On the basis that we or they have a legitimate interest (for example, managing our risk or preventing crime, fraud and money laundering), and in order to protect our business.

Where we intend to process the personal information you have provided for a purpose other than that for which the personal information was collected, we shall provide you with information on that other purpose and with any relevant information prior to that further processing.

How We Might Share Your Information

We may need to share your personal information with the following third parties in order to help us to provide employment to you:

- Providers who need to know the information in order to provide us or you with a service (such as childcare vouchers such as death in service benefits);
- Third party service providers who process information on our behalf to help run some of our internal business operations including background checks, training, email distribution and IT services;
- Credit reference agencies to check your identity and obtain credit references;
- HMRC;
- Regulators or law enforcement bodies in order to comply with any statutory, regulatory or legal obligation or court order.
- entities who may or do acquire any rights in us for the purpose of a business sale or reorganisation;
- our advisors, for the purpose of assisting us to better manage, support or develop our employees and comply with our legal and regulatory obligations;

These parties may be located in the UK, other countries in the European Economic Area or elsewhere in the world. Whenever we or service providers transfer your personal information outside of the European Economic Area, we or they impose the standard contractual obligations on the recipients of that information to protect your personal information to the standard required in the European Economic Area. We or they may also require the recipient to subscribe to 'international frameworks' intended to enable secure data sharing.

Retention of Your Personal Information

The personal information that you provide will be retained by us in accordance with applicable laws. However, we will take reasonable steps to destroy or de-identify personal information we hold if it is no longer needed for the purposes set out above.

Type of personal information	Retention period
Normal personal data	6 years after the end of employment
Special categories of personal data	6 years after the end of employment
Personal identity	6 years after the end of employment
Personal financial	Bank account details are erased 3 months after the end of employment Records of salary and taxation, P11 and P60s are retained for 3 years
Personal location	Attendance records for training 6 years after the end of employment
Personal Information relating to any candidate who is unsuccessful in the application/interview process	6 months from the date we inform them they have been unsuccessful
Call recordings	For the life of the customer's funeral plan
CCTV – digital images	Overwritten every 3 months, determined by automation on Server

Special categories of Personal Data

Special categories of personal data include information about an individual's health and other categories of personal information which are closely protected (e.g. ethnicity or biometrics). We do not generally process such information, unless you have voluntarily provided that information to us (for example, where you have notified us of a medical issue to allow for reasonable adjustments to be made).

Identification and Verification Checking

We carry out identification and verification checks when you apply for a job with us. These checks may be carried out with credit reference agencies. We may ask you to provide additional information.

Email

Emails sent via the internet can be subject to interception, loss or possible alteration, therefore we cannot guarantee their security. Although we will do our best to protect your personal information, we cannot guarantee the security of your data sent by email and therefore will have no liability to you for any damages or other costs in relation to emails sent by you to us via the internet. If you would like to contact us, please see the section below or use our contact page.

Information Security

We invest appropriate resources to protect your personal information, from loss, misuse, unauthorised access, modification or disclosure. However, no internet-based site can be 100% secure and we cannot be held responsible for unauthorised or unintended access that is beyond our control.

Updates

We will keep this Privacy Statement under review and make updates from time to time. Any material changes to this Privacy Statement will be communicate to you.

Your Rights

You have the right to request copies of certain of your personal information within our custody and control and details of how we use that information. If you think any of the personal information we hold about you is inaccurate, you may also request it is corrected or erased. You also have a right, in certain circumstances, to object to our processing of your personal information, to require us to stop processing your personal information and/or to withdraw your agreement to processing based on 'consent', but this does not apply where we have other legal justifications to continue processing your data or an overriding legitimate interest (i.e. where processing is necessary for the performance of a contract).

In relation to all of these rights, please write to us at the address below. Please note that we may request proof of identity.

Complaints Process

If you have a complaint about how we have handled your personal information you may contact us using the details below and we will investigate your complaint. You also have the right to lodge a complaint with a supervisory authority (i.e. the ICO) once you have tried to resolve the issue with us.

Contact

If you have any questions about this Privacy Statement, or you think we have incorrect information or you would like a copy of the information we hold about you, you may request details of personal information which we hold about you. Your request should be made in writing where you are requesting a copy of information) to HR.