

## Bloor Homes Staff

### Introduction

At Bloor Homes and our subsidiary companies, we respect your privacy and are committed to protecting your data.

### Scope

This privacy notice tells you about the personal information we process about you while you are an employee of our organisation, and in some cases, after you cease to be an employee. In collecting this information, we are acting as a data controller and, by law, we are required to provide you with information about us, about why and how we use your data, and about the rights, you have over your data.

Wherever you see the words "we", "us", "our", "Bloor Homes" in this notice, these words refer to Bloor Homes Ltd and our subsidiary companies.

[This Privacy Notice explains the data we collect about you and how we use your information:](#)

- As part of the recruitment process
- As a general part of your employment
- Making sure you get paid and pay the right tax
- For your health and safety
- To review and assess your performance at work
- As part of training, development and compliance
- In case of emergency
- Change of company ownership
- If you leave the company

### The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. We collect only that personal data from you that we need to manage the contract of employment between us and operate our business in the way that you would anticipate.

We may collect, use, store and transfer different kinds of personal data about you, which we have grouped as follows:

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<b>Contact Data</b>	includes name, address, email address and telephone number.
<b>Other Identifier Data</b>	includes passport details, training certifications, driving licence, date of birth, job, CCTV footage, National Insurance number and employment details.
<b>Emergency Contact Data</b>	includes information about your next of kin or similar
<b>Financial Data</b>	includes details about bank accounts, salary, payslips, payments to and potentially from you.
<b>Sensitive Data</b>	includes information about your physical health, disabilities, mental health, and sexual orientation (to the extent we have details about your spouse or partner).
<b>Professional Data</b>	includes qualifications, certifications, employment performance and employment history.
<b>Communications Data</b>	includes emails, notes of conversations, etc.

### As part of the recruitment process

As part of the recruitment process, Bloor Homes collects and processes personal data relating to job applicants. As part of our recruitment process, we are likely to process contact data as well as sensitive, professional and other identifying data.

We collect this information in a variety of ways. Data might be contained in application forms, CVs or resumes, obtained from a passport or other identity documents, or gathered through interviews or other forms of assessment processes, including group exercises, case studies and online tests or personality questionnaires. This information is collected in hard copy or electronically.

We also collect personal data about individuals from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks. We will seek information from third parties only once a job offer has been made and will inform the individual that it is doing so.

Information about your application for employment with us is stored and processed within a third-party Applicant Management system, which is hosted within the European Economic Area (EEA). The provider of this system is contractually bound to provide adequate safeguards over your personal data.

Data is subsequently stored in a range of different places, including on an initial application record, in our HR database and on other IT systems (including email).

Personal data will be shared internally for the recruitment exercise. This includes members of the HR department, directors, hiring managers and other staff appropriately trained and involved in the recruitment process.

We will not share personal data with third parties unless an individual's application for employment is successful, and we make a formal offer of employment. We will then share an individual's data with former employers to obtain references, employment background check providers to obtain necessary background checks and obtain necessary criminal records checks.

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For unsuccessful applicants, we will keep information about your recruitment with us for a period of one year after your application has ended. If we feel that there may be a suitable opportunity at Bloor homes within this period, we may contact you about the new opportunity.

For successful applicants, we will keep information about your recruitment with us for as long as you are an employee, and for a period of six years after your employment has ended, unless we are required to retain specific information by law.

### **As a general part of your employment**

When you become an employee of Bloor Homes, we need you to provide a variety of personal information, including your name, address, contact telephone number, date of birth and next of kin. Without this information, we will be unable to employ you.

This information is collected to be able to put in place and maintain our employment contract with you and to allow you to participate in the business activities for which you have been employed.

We are also required by law to take a scan of your passport or work permit in order to confirm your permission to work in the UK.

During your employment with us, we will generally collect additional information about you to allow us to meet further legal obligations in areas such as equal opportunities monitoring. This may include details of gender, racial origin, disability and trade union membership.

Information about your employment with us is stored and processed within a third party Human Resources system, which is hosted within the European Economic Area (EEA). The provider of this system is contractually bound to provide adequate safeguards over your personal data and we undertake suitable assurance exercises to ensure this is the case.

We will keep information about your employment with us for as long as you are an employee, and for a period of six years after your employment has ended unless we are required to retain specific information by law.

### **Making sure you get paid and pay the right tax**

As part of our employment contract with you, and to meet our legal obligations to the tax authority, we need to hold details of your salary or wage rate, terms and conditions, benefits, hours worked, tax code, previous earnings and, if applicable, other information to do with overtime, bonuses and pensions. Without this information, we will be unable to pay you.

We will keep information about your pay and benefits for as long as you are an employee, and for a period of six years after your employment has ended unless we are required to retain specific information by law.

### **For your health and safety**

To meet our legal obligations in the area of health and safety, we hold information about your health, including details of occupational health reports, training, injuries and any sickness. This information is required by law.

This data may be shared with third party occupational health agencies which are based in the UK.

To help protect our employees, the general public and comply with our health and safety obligations, we reserve the right to make use of CCTV (or similar technologies) on our sites or transport equipment. We have undertaken a legitimate interest balance test to validate our lawful processing of this data, and also have a legal obligation to protect our staff.

Where reasonably required, we may present health and safety contact details and certifications on site, which may include your contact details.

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Information about you in the area of health and safety will generally be retained for as long as you are an employee, except where we are legally required to keep it for a longer period as specified within the relevant legislation or to help satisfy any future potential claim.

### **To review and assess your performance at work**

During your employment, information may be generated about your performance at work and, in some circumstances, regarding disciplinary action or warnings. We will use and retain this information on the grounds of our legitimate interest, which is to ensure that work is completed to an acceptable standard in support of our business processes.

This information is held locally within the business and is not shared with any third parties.

Performance and disciplinary information are held for as long as you continue to be an employee, and for a period of six years after the end of your employment unless it is necessary to defend a legal claim.

### **As part of training, development and compliance**

As part of training and employee development activities, we may keep records of training courses attended, certifications held, and other learning opportunities, including the nature of the activity and the dates, attended. We will use and retain this information on the grounds of our legitimate interest, which is to ensure that adequate training is provided and that our employees are suitably qualified to fulfil their roles within the business.

Your training and development records are held both locally within the business and in a secure 3rd party learning management system.

In addition, we use a dedicated 3rd party compliance management service to manage the different policies and procedures that you will need to understand and agreed to as part of your employment.

Information about training, development and compliance is not shared with any third parties. We store this data for as long as you continue to be an employee, and for a period of six years after the end of your employment, unless we are required to keep it for legal reasons.

### **In case of emergency**

As part of our duty of care to Bloor Homes staff, we may keep records of an employee's emergency contact, in case there is need to contact someone on your behalf should you not be able to. We will use and retain this information on the grounds of our legitimate interest, which is to ensure that your personal safety and well-being.

This information is held locally within the business and is not shared with any third parties.

Information about emergency contacts are held for as long as you continue to be an employee, and for a period of one year after the end of your employment unless we are required to keep it for legal reasons.

### **Change of company ownership**

Should there be a change of company ownership, we may need to share your personal data in line with our legal obligations. Potential scenarios include; the sale of over 50% of the shares of the Company or other change of control or any potential transfer of the executive's employment under TUPE.

In this scenario, disclosure may include change of control or transfer, disclosure to the potential purchaser or investor and their advisors.

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### If you leave the company

If you cease to be employed by Bloor Homes, we will keep your personal data on record for a period of six years from the date of your departure, unless we are required to retain specific information longer by law.

Where there is not a requirement for us to hold your personal information beyond employment, we will look to remove this at the first opportunity. This includes areas like emergency contact information.

### Sharing your personal data

We may have to share your personal data with select third parties, for example:

- recruitment portal
- pension companies
- training providers
- occupational health providers
- mystery shopping providers
- insurance providers
- human resource system providers
- driving licence verification services
- employee benefits organisations
- healthcare providers
- government organisations and regulator

We require all third parties to respect the confidentiality and security of your data and to treat it in accordance with the data protection laws. We do not allow our third-party service providers to use your data for their own purposes and only permit them to process your personal data for specified purposes and by our instructions.

### Automated decision making

We do not use the information you provide to make any automated decisions that might affect you.

### International transfers

We do not knowingly transfer any personal data outside the European Economic Area (EEA).

### Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Also, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including to satisfy any legal, accounting, or reporting requirements.

As it pertains to human resource related information, we have a default retention period set for a period of six years from the date of departure, unless we are required to retain specific information for a different duration by law.

To determine the appropriate retention period for personal data, we 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 purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

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### Changes to the privacy notice and your duty to inform us of changes

This version of our privacy policy was last updated in May 2023.

It is vital 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.

### Your rights over your information

By law, you can ask us what information we hold about you, request to have access to it, and you can ask us to correct it if it is inaccurate. In those cases where we process your information for contractual reasons, you can ask us to give you a copy of the information.

If you believe we are not using your information lawfully, you can ask us to stop using it for a period. In some circumstances, you may have the right to ask us to erase your personal data.

To submit a request by email, post or telephone, please use the contact information provided below.

### Contacting us

We are not required to have a data protection officer, so any enquiries about our use of your personal data should be addressed to the contact details below.

Address: Bloor Homes Head Office  
Ashby Road  
Measham  
Swadlincote  
Derbyshire  
DE12 7JP

Phone: 01530 270100

Email: [hq@bloorhomes.com](mailto:hq@bloorhomes.com)

### Your right to complain

If you have a complaint about our use of your personal information, we would prefer you to raise it with us in the first instance to give us the opportunity to put it right, but you can also contact the Information Commissioner's Office as below:

Address: Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Phone: 0303 123 1113

Website: [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns)