



Severn Group

Employee Privacy Notice

AUGUST 2023

Introduction

This Employee Privacy Notice which includes guidelines on Data Retention, sets out what information about you (your personal data) we, the Contour Technologies Limited and its subsidiaries (hereafter known as Severn Group), hold and how we collect and use it, both whilst you are working for us and after you have left. It applies to current and former employees, workers, contractors, agency workers, consultants, and directors and others employed or engaged by Severn Group (together referred to as 'employees' or 'you').

We are required by data protection law to give you the information in this Privacy Notice. It is important that you read this Privacy Notice carefully, together with any other similar information that we might give you from time to time about how we collect and use your personal data. You should also read our Employee Data Protection Policy which explains our obligations in relation to personal data and how we keep it secure, as well as what we expect from you when you are handling personal data in the course of your work.

Who is the data controller?

Severn Group is the "data controller" for the purposes of data protection law. This means that we are responsible for deciding how we hold and use personal data about you. Our Data Protection Officer (DPO) can be contacted at dpo@severnvalve.com.

What type of personal data do we hold about you?

Personal data means any information relating to a natural person who can be identified (directly or indirectly) by reference to that personal data or by a combination of identifiers (e.g. name, NI number, employee number, email address, physical features). It can be factual (e.g. contact details or date of birth), an opinion about an individual's actions or behaviour, or information that may otherwise impact that individual in a personal or business capacity.

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We hold and use various types of personal data about you, including, for example: biographical details; personal contact details such as your name, address, telephone numbers and email; date of birth, gender, NI number; marital status; your next of kin, emergency contacts and their contact information; recruitment information including employment and education history (qualifications, references, job applications, right to work information and details of any criminal convictions you declare); details of the terms of your employment with us; your bank account details, payroll records and tax status; pay, pension and benefits details; working hours; performance and training information; details of your holidays and other leave; disciplinary, conduct and grievance matters; health and safety; CCTV footage; business equipment, technology and systems usage information; content featuring you produced for use on our website, intranet or social media such as videos, authored articles, blog posts and speeches.

Data protection law divides personal data into two categories: ordinary personal data and special category data. Any personal data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health conditions, sexual life or sexual orientation, or biometric or genetic data that is used to identify an individual is known as special category data (the rest is ordinary personal data).

We hold and use various types of special category data about you, including sickness absence and medical information; details of family leave which could include information about your health, religious beliefs, sexual life, or sexual orientation; equal opportunities monitoring data which could include information about your race or ethnicity, religious beliefs, sexual orientation or health; trade union membership; criminal convictions data.

Why do we hold your personal data and on what legal grounds?

We hold and use this data for employment, HR and business administration purposes. This will include, for example: management of our employment relationship with you; administration of pay and benefits; monitoring and assessment of performance; provision and regulation of holidays and other leave; addressing conduct, disciplinary and grievance issues; performance of day-to-day business activities; to ensure health and wellbeing of employees.

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Data protection law specifies the legal grounds on which we can hold and use personal data. Most commonly, we rely on one or more of the following legal grounds when we process your personal data:

- Where we need it to perform the contract we have entered into with you (performance of the contract). This may include, for example, ensuring that we pay you correctly and that we provide your contractual holiday entitlement.
- Where we need it to comply with a legal obligation (legal obligation). Typically, this may include legal obligations such as the obligation: to provide statutory holidays and statutory family leave and pay (maternity, paternity, adoption, shared parental, etc.); to pay the National Living Wage /National Minimum Wage; to comply with limits on working time; to meet health and safety requirements; not to discriminate or dismiss employees unfairly.
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests (legitimate interest). This may include, for example, managing working hours to ensure effective business operations, and monitoring your use of computers or other technology.

We hold and use your special category data for purposes including, for example: managing absence and ensuring cover; making adjustments to your job to accommodate health conditions; facilitating the taking of family related leave; paying sick pay, maternity, paternity, adoption or shared parental pay as applicable; monitoring equality of opportunity and diversity in our organisation; paying trade union subscriptions, facilitating meetings with trade union representatives, permitting time off for trade union activities.

Since special category data is usually more sensitive than ordinary personal data, we need to have an additional legal ground to use and hold it. Most commonly, as well as one of the legal grounds listed above, we rely on one or more of the following additional legal grounds when we process your special category data:

- Where you have given your explicit consent.
- Where we need to exercise our legal rights or carry out our legal obligations in relation to employment or social security law and the processing is in line with our Employee Data Protection Policy (legal obligation in relation to employment law).

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Occasionally, we may also hold and use ordinary personal data: in the public interest for the detection or prevention of crime; or where needed to protect your vital interests or those of another person. We may also occasionally hold and use special category data: to establish, exercise or defend a legal claim; where needed to protect your interests (or someone else's interests) where you are not capable of giving your consent; or where you have already made the information public.

Sometimes we may use your personal data for purposes that are different from or incompatible with those for which we collected it. If we do this, we will notify you and explain our legal ground for using your data in this way, as required under data protection law.

The Appendix to this Privacy Notice sets out in more detail the types of ordinary and special category personal data we collect and hold about you, what we use it for, who we share it with and the relevant legal grounds under data protection law for doing so.

How do we collect your personal data?

You provide us with most of the personal data about you that we hold and use. Other personal data about you we hold, and use is generated by you in the course of carrying out your duties. For example, during email correspondence or when producing documents or when you are using certain equipment such as computers, door entry systems/clocking-in and out systems.

Some of the personal data we hold and use about you is provided by or generated from internal sources during the course of running our business. For example, your manager will assess you as part of the appraisal process and information about you may be generated as part of our business and operational planning.

Some of the personal data about you that we hold, and use may come from external sources.

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For example: when we offered you a job, we may have collected references from previous employers; we may obtain information about you from publicly available sources such as your LinkedIn profile or other media sources; we may receive information from HMRC and other government departments; we may receive information about you from providers of employee benefits; we may ask for a report from an occupational health professional if you have long-term sickness absence; we might seek advice from a professional adviser that includes information about you; or your trade union representative might correspond with us in particular situations.

If you give us someone else's personal data

Sometimes, you might provide us with another person's personal data – e.g., details of your emergency contact or next of kin. In such cases, a separate privacy notice is available on our website in respect of this data.

Who do we share your personal data with?

We will only share your personal data with third parties where we have an appropriate legal ground under data protection law which permits us to do so. Commonly, this could include situations where we are legally obliged to provide the information (e.g., to HMRC for tax purposes), to comply with our contractual duties (e.g., to providers of your contractual benefits such as occupational pension, health insurance, etc.), or where it is necessary in our legitimate interest (e.g. to an IT service provider for maintenance of our IT systems).

Further details of who we share your personal data with, and our purposes and legal grounds for doing so, are set out in the Appendix to this Privacy Notice.

Overseas transfers

Where we transfer personal data overseas, we ensure that we have appropriate safeguards in place to protect your data.

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Consequences of not providing personal data

We only ask you to provide personal data when we have a good reason and there may therefore be consequences if you do not provide particular information to us.

Some of the personal data you provide to us is required by law. For example, if you do not provide your national insurance number, we will not be able to make correct tax/NI deductions on PAYE, and, if you are pregnant, we require a MATB1 in order to pay statutory maternity pay.

We may require you to provide other personal data, where it is necessary for us or our pensions/benefits providers to fulfil our contractual obligations to you, or for you to fulfil your contractual obligations to us, or where our use of the data is necessary in our legitimate interests. For example, if you do not provide us with a timesheet, we cannot pay you for the overtime hours you have worked / if you do not complete the application form for health insurance, we cannot provide you with health insurance.

If you choose not to provide us with personal data requested, we will tell you about the particular implications of any such decision at the relevant time.

Solely automated decision-making

Solely automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We do not envisage that any decisions will be taken about you using solely automated means, however we will notify you in writing if this position changes.

Your rights

You have a number of legal rights relating to your personal data, which are outlined here:

- The right to make a subject access request. This enables you to receive certain information about how we use your personal data, as well as to receive a copy of it and to check that we are lawfully processing it.
- The right to request that we correct incomplete or inaccurate personal data that we hold about you.

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- The right to request that we delete or remove personal data that we hold about you where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- The right to object to our processing your personal data where we are relying on our legitimate interest (or those of a third party), where we cannot show a compelling reason to continue the processing.
- The right to request that we restrict our processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- The right to request that we transfer your personal data to you or to another party, in a structured format. This right applies in respect of data that you have provided where our legal ground for using the data is that it is necessary for the performance of a contract or that you have consented to us using it (this is known as the right to “data portability”).

If you would like to exercise any of the above rights, please contact the DPO in writing. Note that these rights are not absolute and in some circumstances we may be entitled to refuse some or all of your request.

Data processors

Data Processors are third parties who provide certain parts of employee services for us. We have contracts in place with them and they cannot do anything with your personal information unless we have instructed them to do so. The types of data processors are listed in the Appendix.

Data retention guidelines

These guidelines explain how long we keep information about you (personal data), both while you are working for us and after you have left.

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How do we decide how long to keep your personal data?

We take into account the following criteria when determining the appropriate retention period for Employees' personal data:

- the amount, nature, and sensitivity of the personal data;
- the risk of harm from unauthorised use or disclosure;
- the purposes for which we process your personal data and how long we need the particular data to achieve these purposes;
- how long the personal data is likely to remain accurate and up to date;
- for how long the personal data might be relevant to possible future legal claims;
- any applicable legal, accounting, reporting or regulatory requirements that specify how long certain records must be kept ;and
- business need.

Guideline retention periods

The Appendix sets out guideline retention periods for different categories of Employees' personal data. However, for some categories of personal data, it is more appropriate to decide retention periods on a case-by-case basis, using the criteria described above, and this is indicated in the table where applicable.

In addition, there may be circumstances in which it is appropriate to depart from the guideline retention periods set out in the table, and instead decide to keep a particular item of personal data for a longer or shorter period than that set out in the table. Such decisions will be based on relevant circumstances, taking into account the criteria listed above. In particular, we will always keep personal data if required to do so under legal, reporting or regulatory requirements.

In some circumstances, we may anonymise your personal data so that it can no longer be associated with you, in which case the data will no longer be considered personal data and these guidelines will not apply.

You should also read our Employee Data Protection Policy, which summarises our legal obligations when processing your personal data, as well as your own obligations in relation to any personal data that you handle in the course of your work. A copy of the Employee Data Protection Policy is available on the Group Policy Hub.

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If you have any questions or concerns about how your personal data is being used by Severn Group, you can contact the DPO on dpo@severnvalve.com

Note too that you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. Details of how to contact the ICO can be found on their website: <https://ico.org.uk>.

Agreement to follow this Notice

This Notice will be kept under regular review. It does not override any applicable national data privacy protection laws and regulations in countries where Severn Group operates.

This Notice is fully supported by The Board and Executive Committee. This Notice is non-contractual and may be amended at any time. This Notice should be read in conjunction with the Code of Conduct and the Employee Data Protection Policy. All Severn Group Policies can be accessed on the Group Policy Hub.

At Severn Group, our business success flows from expertise – from technical knowledge and experience that position us as a leader in our field. Not everything, however, can be engineered. The Values which underpin that success stem instinctively from the culture we seek to sustain. Everything we do is tested against our Values, and our people are encouraged to apply them every day: they are the stewards of our brand, our reputation, our heritage, our ambitions.



Customer



Integrity



Excellence



Accountability