

## DATA PRIVACY NOTICE

### INTRODUCTION

This Data Privacy Notice (**DPN**) provides you with important information about how and why Frontgrid Limited collects and Processes your Personal Data. Frontgrid Limited will be what is known as the 'Controller' (**Controller**) of the Personal Data you provide to us.

This DPN is personal to you. It should be read in conjunction with our Data Privacy Policy (contained in the Staff handbook) which contains more generalised information about our data protection procedures, and how Frontgrid Limited Processes the Personal Data of its employees and workers.

### WHAT PERSONAL DATA DO WE COLLECT?

Personal Data (**Personal Data**) is any information identifying you, or information relating to you, that we can identify (directly or indirectly) from that data alone (or in combination with other identifiers we possess or can reasonably access). Personal Data includes some special categories of data and may include criminal conviction data. The following table gives a non-exhaustive list of examples of what is included and excluded from these definitions:

Personal Data		Excluded / Not Personal Data
Personal Data	Special Category Data & Criminal Conviction Data (formerly called Sensitive Personal Data)	
<ul style="list-style-type: none"> <li>Name</li> <li>Address</li> <li>Telephone number</li> <li>Date of birth</li> <li>Gender</li> <li>Qualifications</li> <li>Opinions about your actions or behaviour (e.g. references, staff appraisals, disciplinary records)</li> </ul>	<ul style="list-style-type: none"> <li>Racial or ethnic origin</li> <li>Political opinions</li> <li>Religious or similar beliefs</li> <li>Trade union membership</li> <li>Physical or mental health conditions (e.g. sick notes, medical reports)</li> <li>Sexual life</li> <li>Sexual orientation</li> <li>Biometric or genetic data</li> <li>Criminal offences and convictions (e.g. DBS checks)</li> </ul>	<ul style="list-style-type: none"> <li>Anonymous data</li> <li>Data that has had your identity permanently removed (e.g. statistical information about the gender breakdown of our workforce from which you cannot be identified)</li> </ul>

In some limited circumstances, and for specified purposes, we will also Process Personal Data relating to your next of kin and/or dependants. For example, for the purposes of administering any insurance and pension benefits they may be entitled to. Where this occurs, we will need to contact your next of kin and/or dependants separately to explain why we need to process their Personal Data.

### WHAT IS PROCESSING?

Any activity that involves the use of your Personal Data is referred to as Processing (**Processing** or **Process**). It includes:

- Obtaining, recording or holding Personal Data;

- Carrying out any operation or set of operations on Personal Data (e.g. organising, amending, retrieving, using, disclosing, erasing or destroying it); and
- Transmitting or transferring Personal Data to third parties.

## **OUR COMMITMENT TO COMPLYING WITH THE DATA PROTECTION PRINCIPLES**

We adhere to the Data Protection Principles (**DPP**) relating to Processing of Personal Data (as set out in the retain regulations now known as the United Kingdom General Data Protection Regulation (EU 2016/679) (**UK GDPR**). The DPP require Personal Data to be:

- Processed lawfully, fairly and in a transparent manner;
- Collected only for specified, explicit and legitimate purposes;
- Adequate, relevant and limited to what is necessary in relation to the purposes for which it is Processed;
- Accurate and where necessary kept up to date;
- Not kept in a form which permits your identification for longer than is necessary for the purposes for which the data is Processed;
- Processed in a manner that ensures its security, using appropriate technical and organisational measures to protect against unauthorised or unlawful Processing and against accidental loss, destruction or damage;
- Not transferred to another country without appropriate safeguards being in place; and
- Made available to you on request and that you are allowed to exercise certain rights in relation to your Personal Data.

Our Data Privacy Policy (which is contained in the Staff Handbook) provides further information about the DPP and how we adhere to them.

## **WHY DO WE NEED YOUR PERSONAL DATA?**

In most circumstances, we do not rely on your consent to Process your Personal Data. Instead, we will rely on one or more permitted conditions to Process your Personal Data as laid down by the UK GDPR (**Conditions**). These Conditions permit the Processing of Personal Data without your consent. A non-exhaustive list of the Conditions we commonly rely on include, where the Processing is necessary for:

- Entering into, or performing, a contract between us;
- Compliance with a legal obligation to which we are subject;
- The purposes of our legitimate interests; or
- To protect your vital interests.

In reliance on these Conditions for Processing, we Process your Personal Data, including Sensitive Personal Data, for legal, employment and personnel purposes – including:

- During the recruitment and selection process e.g. to check your qualifications and/or to obtain references from a former employer;
- The legal administration of your employment contract and relationship with us. For example, to:

- Issue you with contracts and payslips; and
  - Enable you to be paid and for us to administer PAYE;
  - Ensure you receive any benefits to which you may be contractually entitled; and
  - Deal with the termination of your employment (e.g. your resignation or dismissal).
- To communicate with you in connection with your employment and role. For example, to let you know about:
    - Any changes to your terms and conditions (e.g. pay-rises, hours of work, place of work or your contractual benefits);
    - Your job-description and duties;
    - Your holiday entitlement and pre-approved holidays;
    - Your entitlement to particular benefits in certain circumstances e.g. to maternity, paternity or adoption leave and pay;
    - Any changes we make to our policies and procedures (e.g. if we update our staff handbook);
    - Any training and promotion opportunities which may arise; and
    - Any threats to your continued employment (e.g. redundancy, or the transfer of your employment to a new employer).
  - To understand how your health may be relevant to your work. For example, to allow us to:
    - Verify any sickness absences (e.g. via self-certification and/or sick-notes);
    - Make reasonable adjustments to minimise the impact of any known work-relevant disability;
    - Obtain medical reports if your health is affecting your ability to perform your role; and
    - Record details of any accidents connected with work (e.g. certain accidents and work-related illnesses or injuries must be reported to the relevant authorities for health and safety purposes).
  - To keep appropriate records required by law and/or for employment law purposes. For example, we will keep a record of:
    - Your contract and job description (including any changes which may occur);
    - Your induction and any other training you have undertaken;
    - Your timekeeping;
    - Your hours of work and rest periods;
    - Any absences from work (e.g. holiday, maternity/paternity/ adoption leave, or compassionate leave);
    - Your pay, PAYE and any other deductions from your pay;
    - Any disciplinary actions or other warnings you receive; and

- Any accidents, injuries, diseases occurring at, or related to, your work.
- To monitor your performance or conduct to enable us to:
  - Conduct performance appraisals;
  - Identify any training needs;
  - Consider you for development opportunities (e.g. transfers or promotions);
  - Ensure compliance with our rules, policies and procedures; and
  - Deal with any disciplinary issues or grievances that may arise.
- To record information about any applicable protected characteristics you hold (e.g. your sex, ethnic origin, religion or disability) so that we can ensure compliance with our legal obligations and monitor how those with protected characteristics might be impacted by our policies and procedures. We may also use this information (in an anonymised format) for equal opportunity monitoring and reporting purposes;
- To assist us in the operation of the business. For example, identifying the nature of our workforce and how it is deployed, assist workforce planning, allow financial and marketing modelling and target setting; allow sales lead and payment tracking, managing client services and optimising Paratrop VR experiences; and/or
- So that we can notify your next of kin in the event of your suffering an injury or illness at work.

## **HOW DO WE PROCESS YOUR PERSONAL DATA?**

Your Personal Data will be Processed by our own employees in the UK e.g. your line manager and HR.

However, for the purposes of IT hosting and maintenance, Personal Data may be located on servers within the European Union. In sharing this information we will do so either pursuant to a decision of adequacy issued by the European Commission regarding the UK's data protection laws or through contractual arrangements with the third parties holding our data to ensure adequate security is in place.

## **DO WE SHARE YOUR PERSONAL DATA?**

In limited circumstances, we may need to share your Personal Data with:

- Those who provide products or services to us (e.g. payroll administrators, and pensions or insurance providers);
- Social media websites (e.g. Facebook, Instagram, LinkedIn and Twitter), Google analytics and Customer Relationship Management (CRM) Systems for community and advertising purposes, marketing and website analytics; and
- The relevant regulatory and/or professional bodies (e.g. The Global Association for the Attractions Industry, Blooloo, MENALAC, Experience UK and Immerse UK).

We will notify you in advance if this applies to you and will ensure that certain safeguards and contractual arrangements have been put in place to protect the security of your Personal Data. Otherwise, we will not share your Personal Data with third parties without your consent unless the law allows or requires us to do so.

## HOW LONG WE KEEP YOUR PERSONAL DATA?

We comply with current best practice guidelines for the retention of your Personal Data. In summary this means:

TYPE OF EMPLOYMENT RECORD	RETENTION PERIOD
Job applications and interview records of unsuccessful candidates	6 months after notifying unsuccessful candidates
Personnel and training records	6 years after termination
Working time records	2 years
Annual leave records	6 years
Payroll and wage records	Companies: 6 years from the financial year-end in which payments were made
PAYE records	6 years from the financial year-end in which payments were made
Maternity records	Three years after the end of the tax year in which the maternity pay period ends
Current bank details	Until final salary payment is made
Records of advances and loans made to employees	6 years after repayment
Death benefit nomination/revocation forms	6 years after payment of benefit or termination of employment
Any reportable accident, death or injury in connection with work	3 years 6 months
Disclosure and Barring Service (DBS) checks and other disclosures of criminal records	Deleted after recruitment process unless assessed as relevant to the on-going employment relationship (then deleted once the conviction is spent unless it is an excluded profession).
Right to work in the UK checks	2 years after termination

## WHAT ARE YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA?

You have rights when it comes to how we handle your Personal Data. Some of these rights are dependent on the nature and purposes of the processing. In summary, these include rights to:

- Withdraw your consent to Processing at any time (where we have relied on your consent to conduct the Processing);
- Receive certain information about our Processing activities;
- Request access to the Personal Data that we hold on you;
- Prevent our use of your Personal Data for direct marketing purposes;
- Ask us to erase Personal Data if it is no longer necessary in relation to the purposes for which it was collected or Processed or to rectify inaccurate data or to complete incomplete data;

- Restrict Processing in specific circumstances;
- Challenge Processing which has been justified on the basis of our legitimate interests or in the public interest;
- Request a copy of an agreement under which Personal Data is transferred outside of the EEA;
- Prevent Processing that is likely to cause damage or distress to you or anyone else;
- Be notified of any personal data breach which is likely to result in high risk to your rights and freedoms;
- Make a complaint to the Information Commissioner; and
- In limited circumstances, receive or ask for your Personal Data to be transferred to a third party in a structured, commonly used and machine readable format.

If you wish to exercise any of your rights in relation to your Personal Data, or if you require further information about our Processing of your Personal Data, please contact our Data Protection Officer: Tammy Owens (Telephone: +44 (0)7825 077601 and Email: tao@frontgrid.co.uk).

#### **HOW DO WE ENSURE YOUR PERSONAL DATA IS SAFE AND SECURE?**

We will take appropriate security measures against unlawful or unauthorised Processing of, or the accidental loss of or damage to, your Personal Data.

We have put in place procedures and technologies to maintain the security of your Personal Data from the point of collection to the point of destruction. Personal Data will only be transferred to a third party data processor (see above: Do we share your Personal Data?) if they agree to comply with those procedures and policies, or puts in place their own adequate security measures.

We will maintain data security by protecting the confidentiality and availability of your Personal Data. Only people who are authorised to use your Personal Data can access it and authorised users can only access Personal Data for authorised purposes.

#### **CHANGES TO THIS DATA PRIVACY STATEMENT**

We keep our practices and policies regarding the collection, Processing and security of Personal Data under continual review and may update them from time to time. We therefore reserve the right to change this Data Privacy Statement at any time. We will notify you of any changes made at the appropriate time and may re-issue a new Data Privacy Statement