



# Colleague Privacy Notice



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## 1. Introduction

At the Restore Group of companies we are committed to protecting the privacy and security of your personal information. This Colleague Privacy Notice applies to all current and former colleagues, contractors or other workers employed by the Restore Group.

This Colleague Privacy Notice describes what personal information we collect, why we collect it, how we use it, the controls you have over your personal information, both during and after your working relationship with us, and the procedures that we have in place to protect your personal information. All these activities are in accordance with the General Data Protection Regulation ('UK GDPR') and the Data Protection Act 2018 (the 'Act').

We take our responsibility for the personal information we collect about you seriously. We will be transparent about how we handle it and give you control over it. It is important that you read and retain this Colleague Privacy Notice, together with any additional specific privacy notices we may provide to you where we collect or process personal information about you. This is to ensure that you are aware of how and why we are using the information and your rights in this regard.

This Colleague Privacy Notice does not form part of any contract of employment or any other contract to provide services to Restore Group. We may update this Colleague Privacy Notice at our discretion at any time.

**Please read this Colleague Privacy Notice carefully to understand how we handle your personal information.**

## 2. Who Is Responsible For Your Personal Data?

This Colleague Privacy Notice is issued on behalf of the Restore Group of Companies. When we refer to 'Restore' Group, 'us', 'we' or 'our' in this Colleague Privacy Notice, we mean the Restore Group companies with which you are or were employed, as identified in your employment contract, and which is responsible (as a data controller) for the processing of your personal information.



### 3. What Are The Data Protection Principles?

When using the term 'personal data' or 'personal information' in this Colleague Privacy Notice, we mean information (including opinions) that relates to you and from which you could be identified, either directly or in combination with other information which we may have in our possession. It does not include data where the identity has been removed (anonymous data).

To help you understand how we handle your personal information more clearly, below is a summary of the data protection principles which guide how we use your personal information. These principles provide that personal data should be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only for so long as is necessary for the purposes we have told you about.
- Kept securely.

We have put policies and procedures in place to seek to adopt these principles in our everyday processing activities as set out in this Colleague Privacy Notice.

### 4. What Kind Of Information Do We Hold About You?

We may collect, store, and use the following categories of personal information about you:

- General colleague data including full name, title, contact address, telephone numbers, email addresses, date of birth, gender, ethnic origins, marital status and dependents, next of kin and emergency contact information and National Insurance number, photographs, evidence of right to work, personal preferences such as smoking (optional), medical information, disability information (where applicable), travel and accommodation details, working time / shift pattern.





- Financial information including bank account details, payroll and share plan records and tax status information.
- Position information including job title, colleague number, role and function, work history, working hours, annual leave and other leave entitlement and used, details about absence from work, training records, medical assessment details, reporting structure, date of hire, notice period, departments, salary details, pay grade, pension and benefits information.
- Education data including curriculum vitae/resume details, qualifications, language abilities, areas of expertise, training history, professional memberships, and honours and awards.
- Career history data including former employers, work experience, length of time in role(s) and business(es), disciplinary and grievance records, project and industry experience, assignments undertaken/worked on, performance information, reviews, ratings/reports, insurance information and compensation history.
- Internal investigation data contained in emails or other documents which may be relevant to an internal investigation.
- Vehicle information including driving licence details, vehicle registration, car usage (mileage), insurance and accident details and vehicle tracking data.
- CCTV footage, in-vehicle CCTV footage or other information obtained through electronic means such as swipe card records.
- Image and/or voice captured through photography, filming, videotaping and/or audio recording; Information about your use of our information and communications systems.
- Responses to internal surveys.
- Building access and movement records.
- System and resource access and usage activity.
- Personal conduct information from vetting procedures.
- Details of your interest in and connection with the intermediary through which your services are supplied (as it applies to contractors and any other relevant workers).



We may also collect, store and use the following 'special categories' of personal data (as defined by UK GDPR and the Act), including information about:

- Your race or ethnicity, religious beliefs and sexual orientation.
- Trade union membership.
- Biometric data.
- Your health, such as any information about any medical conditions and employment sickness records, including:
- Where you leave employment and under any share plan operated by a Restore Group company where the reason for leaving is determined to be ill-health, injury or disability, the records relating to that decision.
- Details of any absences (other than holidays) from work including time on statutory parental leave and sick leave.
- Details for long term sickness absence management (such as making adjustments and accommodations).
- Where you leave employment and the reason for leaving is related to your health, information about that condition needed for pensions and permanent health insurance purposes.

Depending on the role that you hold with us, we may also process information about criminal convictions and offences, including civil order barring information (please refer to Section 8 for further details).

Some of this information about you may have been collected during recruitment when you applied to work for Restore and which was retained and processed as part of your on-boarding as a new Restore colleague.

## 5. How Is Your Personal Information Collected?

Subject to the nature and requirements of the specific role(s) for which you are employed by Restore, we may collect personal information about you from a number of sources:

- You, as the colleague, worker or contractor.
- Recruitment agencies.
- Screening and background check providers.
- HM Revenue and Customs.
- Disclosure and barring services in respect of criminal convictions.
- Share plan administrators in connection with any plans that you may participate in, and trustees of any colleague benefits trusts used in connection with the operation of these plans.





- Reference requests made to third parties, including previous employers and referees named by you when applying for a role.
- Trustees or managers of pension arrangements operated by Restore.
- In the course of job-related activities throughout the period of you working for us.
- Government agencies.
- Training providers.
- Fleet management providers.
- Health providers.
- Insurance companies.
- Colleague survey providers.
- Professional advisors including external legal advisors.
- IT service providers.
- Client organisations for whom you may undertake activities.
- Travel service providers including car leasing organisations and fuel card providers.

## 6. How We Will Use Information About You?

We will use the personal information we collect about you to (where applicable):

- Administer the contract we have entered into with you.
- Pay you (deducting tax and National Insurance contributions).
- Provide your colleague benefits to you, such as reward programmes.
- Invite you to participate in and grant any awards pursuant to any share plans operated by Restore.
- Administer your participation in any share plans operated by Restore, including communicating with you about your participation and collecting any tax and social security due. We may also liaise as required with third party plan administrators and any trustees of a Colleague Benefit Trust in connection with the settlement of your awards.
- Enrol you in a pension arrangement in accordance with our statutory automatic enrolment duties.
- Liaise with the trustees or managers of a pension arrangement operated by Restore, your pension provider and any other provider of colleague benefits.
- Provide business management and planning, including accounting and auditing.
- Conduct performance reviews, managing performance and determining performance requirements.
- Make decisions about salary reviews and compensation.
- Assess qualifications for a particular job or task, including decisions about promotions.
- Gather evidence for possible grievance or disciplinary hearings.
- Make decisions about your continued employment or engagement.

- Conduct internal surveys with colleagues to enhance business - colleague engagement.
- Make arrangements for the termination of our working relationship.
- Assess whether any adjustments need to be made to your working environment.
- Make travel and accommodation arrangements as part of your business activities.
- Obtain details about education, training and development requirements.
- Deal with legal disputes involving you, or other colleagues, workers and contractors, including accidents at work.
- Ascertain your fitness to work.
- Manage sickness absence.
- To obtain occupational health advice, to ensure that it complies with duties in relation to individuals with disabilities, meet our obligations under health and safety law.
- To assess and comply with health and safety requirements and obligations including in relation to colleague's safety, well-being and health needs which includes test results of relevant colleagues e.g. where necessary for the purpose of safeguarding against the impact of a health-related issue (for example, coronavirus or some other pandemic or disease) or drug and alcohol testing to protect the safety of the workplace.
- Prevent fraud.
- Monitor your use of our information and communication systems to ensure compliance with our IT policies.
- For internal Restore Group promotional, training, news and information sharing purposes.
- To support business and administration functions.
- Ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- Conduct data analytics studies to review and better understand colleague retention and attrition rates.
- Undertake equal opportunities monitoring.

We will use your personal information in connection with legal claims, compliance, regulatory and investigative purposes as necessary (including disclosure of such information in connection with legal process or litigation).

### **If you fail to provide personal information**

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our colleagues).







### Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so.

## 7. What Is The Legal Basis For The Processing We Do?

The law requires us to have a “legal basis” or “lawful ground” to collect and use your personal information. Some of the grounds for processing may overlap and there may be several grounds which justify our use of your personal information.

Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the employment contract we have entered into with you.
- Where we need to comply with a legal obligation.
- Where it is necessary for our legitimate interests or those of a third party, such as ensuring that a colleague is receiving appropriate training and support, and your interests and fundamental rights do not override those interests. (We have carried out balancing tests against the rights, interests and freedoms of the data subject for all the data processing we carry out on the basis of our legitimate interests).

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your vital interests (or someone else’s vital interests) and you are not able to give your consent.
- Where you have already made the information public.
- We have obtained your consent, which you can withdraw at any time.
- Where it is needed in the public interest or for official purposes.
- where it is needed for archiving purposes, scientific or historical research purposes or statistical purposes.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.



Please note that in some circumstances we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

If you have any queries about our use of your personal information (including legal bases) please contact our DPO using the details set out in section 17.

## 8. How We Use Special Category Information?

We may use special categories of your personal data in the following ways:

- We will use information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws.
- We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits including statutory maternity pay, statutory sick pay, pensions and permanent health insurance.
- If you leave employment and, under any share plan operated by Restore the reason for leaving is determined to be ill-health, injury or disability, we will use information about your physical or mental health, or disability status in reaching a decision about your entitlements under the share plan.
- If you apply for an ill-health pension under a pension arrangement operated by Restore, we will use information about your physical or mental health in reaching a decision about your entitlement.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.
- We use health information to ensure suitability for work.
- We may use biometric controls for colleagues to monitor access to and the security of restricted areas.
- We use dietary information, and disability information in order to ensure appropriate facilities (e.g. rooms, training).
- We use information about sexual orientation and religion which may be collected from internal colleague surveys or volunteered by the colleague to enhance business – colleague engagement.
- We will use trade union membership information to pay trade union premiums, register the status of a protected colleague and to comply with employment law obligations.





Special categories of information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information, in addition to having one of the general bases set out in Section 7 above. Where required by applicable laws, we will take steps to have in place an appropriate Notice document and safeguards relating to the processing of such personal information.

We may process special categories of personal information in the following circumstances:

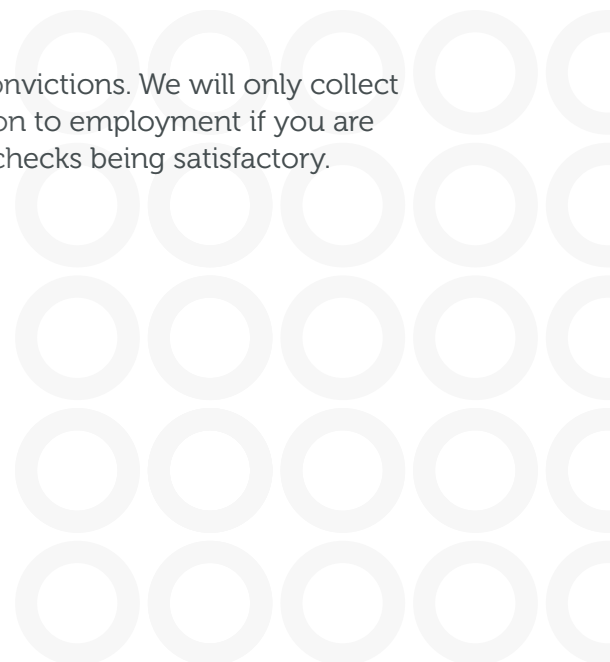
- Where we have your explicit written consent to do so – including where you voluntarily provide us with that personal information.
- Where we need to carry out our legal obligations or exercise rights in connection with your employment.
- The processing is necessary for establishment, exercise or defence of legal claims.
- Where it is needed for reasons of substantial public interest, such as for equal opportunities monitoring, in relation to our occupational pension scheme or preventing or detecting unlawful acts.

Less commonly, we may process and share this type of information where it is needed to protect your vital interests (or someone else's vital interests) and you are not capable of giving your consent, or where you have made that personal information public. We may also process such information about colleagues or former colleagues during legitimate business activities with the appropriate safeguards.

If you have any queries about our use of special category information, please contact the DPO using the information in section 17.

## **9. Do We Process Information about Criminal Convictions?**

For some roles we will process information about criminal convictions. We will only collect information about your criminal convictions' history in relation to employment if you are employed in a designated role which is conditional on such checks being satisfactory.



Where required for your role we will carry out a criminal record check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. In particular:

- We are legally required to carry out criminal record checks for those carrying out certain roles or operating in particular areas of work.
- Your role is one which is listed on the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (SI 1975/1023) and is also specified in the Police Act 1997 (Criminal Records) Regulations (SI 2002/233)] so is eligible for a standard or enhanced check from the Disclosure and Barring Service.
- Your role requires a high degree of trust and integrity.
- We may use criminal information for vetting and fleet management (and to ensure you are legally compliant – e.g. for driving).

Your contract of employment or contract for services sets out any requirement upon you to comply with disclosure and processing of information about criminal convictions.

Where we process information about criminal convictions and offences, we do so in order to protect individuals and businesses and to comply with regulatory and legal obligations. We also need a further justification in addition to the general legal bases set out in Section 7. The processing may be on the basis of substantial public interest which includes:

- Preventing or detecting unlawful acts.
- Regulatory requirements relating to unlawful acts and dishonesty.
- Safeguarding of children and of individuals at risk.

We may also process such information in the event of a claim, as necessary for the purpose of:

- Obtaining legal advice or in connection with, any legal proceedings (including prospective legal proceedings).
- Establishing, exercising or defending our legal rights.

Where required by applicable laws, we will take steps to have in place an appropriate Notice document and safeguards relating to the processing of such personal information.



## 10. Do We Monitor Colleagues?

It is necessary for us monitor our colleagues in various ways in order to comply with our legal and regulatory requirements, based on our legitimate interests as a business or to exercise our rights as an employer. For example, we monitor our colleagues in the following ways:

- tachographs record driving information about time, speed and distance travelled by a vehicle fitted with such a device, as required by law;
- vehicles equipped with telematic devices record information such as vehicle usage, driver location and associated driver behaviour and licence recording;
- monitoring when a member of staff has entered or tried to enter into a swipe card access area and at what time;
- verifying when colleagues start and finish work, such as with the use of biometric technology (i.e. fingerprinting or facial recognition technology);
- review content (for example stored or accessed external contents) on Restore's information systems and monitor telephone, email and internet traffic data.
- drug and alcohol testing; and
- equal opportunities monitoring.

We process personal data obtained through such monitoring in accordance with legal requirements and carry out these activities to the extent it is necessary and proportionate, and it is permitted by law. If you have any concerns in relation to monitoring, please speak to your line manager or HR lead.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

## 11. What About Photography And Filming?

Restore often arranges for photographs and video to be taken at our sites, offices, conferences and events and these often feature our colleagues, contractors and other workers. We will use the images and recordings resulting from such photography or filming for Restore internal promotional, news, training and information sharing purposes and based on these legitimate interests. We may use these images internally, including via Restore communication channels such as Yammer, in newsletters, on company notice boards and in training booklets. If you do not wish to be photographed or filmed, please inform the photographer or individual filming at the time.

If you have any concerns, please contact [dpo@restoreplc.com](mailto:dpo@restoreplc.com).





## 12. Do We Share Your Data?

We will only share your personal information with third parties for the purposes of your employment and associated processing requirements, including:

- Across Restore Group as required for the legitimate business interests of other legal entities within the Restore Group
- Government agencies.
- Health providers (including the NHS).
- Professional advisors such as legal and insurance organisations.
- Training providers.
- Third party benefit providers, as required to provide you with benefits which you are entitled to under your contract with us.
- Share plan administrators and colleague benefits trust trustees.
- IT service providers.
- Communication platform providers such as Yammer.
- Future employers.
- Recruitment agencies.
- Financial organisations such as banks and card processing providers.
- Travel service providers including car leasing organisations and fuel card providers.
- Accommodation providers.
- Vetting service providers.
- Other external service providers that process your data on our behalf.

Restore Group contracted third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow such providers to use your personal data for their own purpose and only permit those providers to process your personal data for specified purposes and in accordance with our instructions.

## 13. How Do We Keep Your Data Secure?

We have put in place appropriate security measures and training to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those colleagues, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality. Please refer to Restore's Information Security Policy (P-005 dated March 2020) for further details.

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

## 14. Do We Retain Your Data?

We keep personal data in accordance with Restore's internal retention procedures, which are determined in accordance with our regulatory obligations and good industry practice. These retention periods depend on the nature of the information (e.g. we apply different retention periods to our staff information as opposed to information about our customers) and may be subject to change.

Restore's Data Retention Guide is available on request. If you have any questions or concerns about how long we retain your personal data, please contact the People Team, your Line Manager or the Data Protection Officer.

## 15. Is Personal Data Transferred Globally?

We do not operate on a global basis. The technology solutions employed by the group are such that your personal data will not be stored outside of the United Kingdom.





## 16. What Are My Legal Rights?

You have legal rights in connection with your personal information. Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a 'data subject access request'). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it. In the first instance you can email your subject access request to [dpo@restoreplc.com](mailto:dpo@restoreplc.com), titling your email Data Subject Access Request.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected. If there has been a change to your personal data that you have supplied to us during the course of your employment, you should inform us.
- **Request erasure** of your personal information (commonly known as the 'right to be forgotten'). This enables you to ask us to delete or remove personal information in limited circumstances, where:
  - (i) it is no longer needed for the purposes for which it was collected;
  - (ii) you have withdrawn your consent (where the data processing was based on consent);
  - (iii) following a successful right to object (see Object to processing);
  - (iv) it has been processed unlawfully; or
  - (v) to comply with a legal obligation to which Restore is subject.
- We are not required to comply with your request to erase personal information if the processing of your personal information is necessary for a number of reasons, including:
  - (i) for compliance with a legal obligation; or
  - (ii) for the establishment, exercise or defence of legal claims.
- **Object to processing** of your personal information by us or on our behalf which has our legitimate interests as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests, but if you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms. You can object at any time to your personal information being processed for direct marketing (including profiling).



- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, but only where: (i) its accuracy is contested, to allow us to verify its accuracy; (ii) the processing is unlawful, but you do not want it erased; (iii) it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or (iv) you have exercised the right to object, and verification of overriding grounds is pending.

We can continue to use your personal information following a request for restriction, where:

- (i) we have your consent;
  - (ii) to establish, exercise or defend legal claims; or
  - (iii) to protect the rights of another natural or legal person.
- **Request the transfer** of your personal information. You can ask us to provide your personal information to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another data controller, but in each case only where: (i) the processing is based on your consent or on the performance of a contract with you; and (ii) the processing is carried out by automated means.
- **Obtain a copy**, or reference to, the personal data safeguards used for transfers outside the European Union. We may redact data transfer agreements to protect commercial terms. This currently is not applicable in Restore (see Section 15)
- **Withdraw consent** to processing where the legal basis for processing is solely justified on the grounds of consent.

If you want to exercise any of the rights above, please submit your requests in writing to [dpo@restoreplc.com](mailto:dpo@restoreplc.com). We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive.

You should be aware that we may not always be able to fully address your request. For example, we may not be able to address your request if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.





## 17. Where Can I Get Further Information?

We have appointed a Group Data Protection Officer (DPO) to oversee compliance with this Colleague Privacy Notice. If you have any questions about this Colleague Privacy Notice or how we handle your personal information, please address to:

Group Data Protection Officer  
[dpo@restoreplc.com](mailto:dpo@restoreplc.com)  
07889 537076

We would request that you please contact your line manager, the DPO or the People Team in the first instance to try and resolve any issues you may have about how we are processing your personal data under this Colleague Privacy Notice. However, you also have the right to contact your supervisory authority at any time and lodge a complaint (which in the UK is the Information Commissioner's Office). The supervisory authority will then investigate your complaint accordingly.

## 18. Changes to this Colleague Privacy Notice

This Colleague Privacy Notice was last reviewed and updated in March 2021.

We may amend this Colleague Privacy Notice from time to time, the most recent version of this Colleague Privacy Notice will be available on Circle. Please regularly check these pages for the latest version of this document.

