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1. **Introduction**

This Policy sets out the Company name>>, a company registered in <<insert cou under number <<insert company registration number>>, w is at <<insert address>> ("the Company") regarding data s of its employees (in this context, "employee data subjects") sonal data under Data Protection Law. "Data Protection Law d regulations in force from time to time regulating the use of p vacy of electronic communications including, but not limited aw version of the General Data Protection Regulation ((EU PR"), as it forms part of the law of England and Wales, Scot and by virtue of section 3 of the European Union (Withdraw Protection Act 2018, the Privacy and Electronic Communica as amended, and any successor legislation.

This Policy sets out the C garding the collection, processing, transfer, storage, and disp lating to employee data subjects. The procedures and princ st be followed at all times by the Company, its employees, a other parties working on behalf of the Company.

2. **Definitions**

"consent" consent of the data subject which eely given, specific, informed, and s indication of the data subject's hich they, by a statement or by a tive action, signify their agreement ssing of personal data relating to

"data controller" natural or legal person or which, alone or jointly with others, the purposes and means of the f personal data. For the purposes cy, the Company is the data f all personal data relating to ta subjects;

"data processor" natural or legal person or which processes personal data a data controller;

"data subject" iving, identified, or identifiable son about whom the Company al data (in this context, employee s);

"EEA" European Economic Area, all EU Member States, Iceland, , and Norway;

"personal data" information relating to a data can be identified, directly or particular by reference to an uch as a name, identification ation data, an online identifier, or re factors specific to the physical, genetic, mental, economic, ocial identity of that data subject;

"personal data breach" reach of security leading to the or unlawful destruction, loss, unauthorised disclosure of, or ersonal data transmitted, stored, processed;

"processing" operation or set of operations on personal data or sets of a, whether or not by automated ch as collection, recording, structuring, storage, adaptation , retrieval, consultation, use, y transmission, dissemination or making available, alignment or restriction, erasure or

"pseudonymisation" rocessing of personal data in such at the personal data can no longer to a specific data subject without dditional information, provided that nal information is kept separately ct to technical and organisational ensure that the personal data is d to an identified or identifiable n; and

"special category person nal data revealing racial or ethnic itical opinions, religious or beliefs, trade union membership, xual life, sexual orientation, genetic data.

3. Scope

3.1 The Company is c letter of the law, but also to the spirit of the law an ce on the correct, lawful, and fair handling of all pers legal rights, privacy, and trust of all individuals with w

3.2 The Company's Da <<insert name of data protection officer>>, <<insert he Data Protection Officer is responsible **[**, wo <<insert department, e.g. HR Department, or pos **]** for administering this Policy and

for developing and cable related policies, procedures, and/or guidelines.

3.3 All <<insert appli managers, department heads, supervisors etc.>> uring that all employees, agents, contractors, or othe half of the Company comply with this Policy and, whe lement such practices, processes, controls, and trai ly necessary to ensure such compliance.

3.4 Any questions rela Data Protection Law should be referred to the Da n particular, the Data Protection Officer should alway lowing cases:

a) if there is g to the lawful basis on which employee pe cted, held, and/or processed;

b) if consent is rder to collect, hold, and process employee pe

c) if there is a to the retention period for any particular typ al data;

d) if any new notices or similar privacy-related documentati

e) if any assis dealing with the exercise of an employee c cluding, but not limited to, the handling of s

f) if a personal or actual) has occurred;

g) if there is to security measures (whether technical or d to protect employee personal data;

h) if employee shared with third parties (whether such third pa controllers or data processors);

i) if employee ransferred outside of the UK and there are qu al basis on which to do so;

j) when any s g activity is to be carried out, or significant c to existing processing activities, which will re mpact Assessment;

k) when emplo be used for purposes different to those for wh cted;

l) if any autom g profiling or automated decision-making, is to

m) if any assist plying with the law applicable to direct marke

4. The Data Protection Princ

This Policy aims to ensure otection Law. The UK GDPR sets out the following principles dling personal data must comply. Data controllers are resp be able to demonstrate, such compliance. All personal da

4.1 processed lawfully, ent manner in relation to the data

subject;

4.2 collected for speci imate purposes and not further processed in a ma ble with those purposes. Further processing for arch blic interest, scientific or historical research purposes shall not be considered to be incompatible with th

4.3 adequate, relevant is necessary in relation to the purposes for which

4.4 accurate and, wher date. Every reasonable step must be taken to ensure s inaccurate, having regard to the purposes for which , or rectified without delay;

4.5 kept in a form which data subjects for no longer than is necessary for the pu rsonal data is processed. Personal data may be store ofar as the personal data will be processed solely fo the public interest, scientific or historical research p rposes, subject to implementation of the appropriate t nal measures required by the UK GDPR in order to sa eedoms of the data subject;

4.6 processed in a man riate security of the personal data, including protection unlawful processing and against accidental loss, d using appropriate technical or organisational meas

5. The Rights of Data Subje

The UK GDPR sets out the icable to data subjects:

5.1 the right to be inform

5.2 the right of access;

5.3 the right to rectificat

5.4 the right to erasure to be forgotten');

5.5 the right to restrict p

5.6 the right to data por

5.7 the right to object; a

5.8 rights with respect t aking and profiling.

6. Lawful, Fair, and Transpa

6.1 Data Protection Law ersonal data is processed lawfully, fairly, and transpar affecting the rights of the data subject. Specifically onal data shall be lawful only if at least one of the follo

a) the data sub o the processing of their personal data for one es;

b) the processi erformance of a contract to which the data sub er to take steps at the request of the data sub a contract;

c) the processi… …mpliance with a legal obligation to which the da…

d) the processi… …ect the vital interests of the data subject or of…

e) the processi… …erformance of a task carried out in the public in… …e of official authority vested in the data controll…

f) the processi… …urposes of the legitimate interests pursued by … …a third party, except where such interests are… …mental rights and freedoms of the data subject… …n of personal data, in particular where the da…

6.2 If the personal data… …ategory personal data (also known as 'sensitive perso… …f the following conditions must be met in addition to on… …ut above:

a) the data sub… …licit consent to the processing of such data fo… …urposes (unless the law prohibits them from d…

b) the process… …he purpose of carrying out the obligations a… …ghts of the data controller or of the data subject… …ment, social security, and social protection la… …uthorised by law or a collective agreement p… …ovides for appropriate safeguards for the funda… …sts of the data subject);

c) the processi… …ect the vital interests of the data subject or … …son where the data subject is physically or… …g consent;

d) the data con… …ssociation, or other non-profit body with a politi… …ous, or trade union aim, and the processing … …ourse of its legitimate activities, provided tha… …solely to the members or former members of … …who have regular contact with it in connection … …that the personal data is not disclosed ou… …e consent of the data subjects;

e) the processi… …ta which is manifestly made public by the data s…

f) the process… …the conduct of legal claims or whenever co… …dicial capacity;

g) the processi… …stantial public interest reasons, on the basis of … …ortionate to the aim pursued, shall respect the e… …ta protection, and shall provide for suitable and… …safeguard the fundamental rights and interests…

h) the process… …he purposes of preventative or occupationa… …ssment of the working capacity of an employee… …for the provision of health or social care or treat… …nt of health or social care systems or services … …ursuant to a contract with a health

professional ns and safeguards referred to in Article 9(3) o

i) the processi lic interest reasons in the area of public healt ing against serious cross-border threats to h tandards of quality and safety of health care a s or medical devices, on the basis of law which d specific measures to safeguard the rights ar subject (in particular, professional secrecy); or

j) the process rchiving purposes in the public interest, sc esearch purposes, or statistical purposes in le 89(1) of the UK GDPR (as supplemente ata Protection Act 2018) based on law which s o the aim pursued, respect the essence of ion, and provide for suitable and specific me he fundamental rights and the interests of t

7. **Consent**

If consent is relied upon as ecting, holding, and/or processing any personal data, the follo

7.1 Consent is a clea a subject that they agree to the processing of their p ear indication may take the form of a statement or a p re-ticked boxes, or inactivity are unlikely to amount t

7.2 Where consent is which includes other matters, the section dealing wit clearly separate from such other matters.

7.3 Data subjects are f at any time and it must be made easy for them to do draws consent, their request must be honoured promp

7.4 If personal data is t erent purpose that is incompatible with the purpose o hat personal data was originally collected that was a subject when they first provided their consent, cons e or purposes may need to be obtained from the d

7.5 Where special cat processed, the Company shall normally rely on a la plicit consent. If explicit consent is relied upon, the dat t be issued with a suitable privacy notice in order to ca

7.6 In all cases where as the lawful basis for collecting, holding, and/or proc cords must be kept of all consents obtained in order to y can demonstrate its compliance with consent require

8. **Specified, Explicit, and L**

8.1 The Company colle employee personal data set out in Parts 23 to 28 of thi

a) personal dat… employee data subjects**[.] OR [**; and**]**

b) **[**personal da…rties.**]**

8.2 The Company only … holds employee personal data for the specific purpos…to 28 of this Policy (or for other purposes expressly …ction Law).

8.3 Employee data sub…med at all times of the purpose or purposes for which …personal data. Please refer to Part 15 for more informa…jects informed.

9. Adequate, Relevant, and …g

9.1 The Company will c…employee personal data for and to the extent necessa…e or purposes of which employee data subjects have … informed) as under Part 8, above, and as set out in Pa…

9.2 Employees, agents…parties working on behalf of the Company may colle…ata only to the extent required for the performance of…ly in accordance with this Policy. Excessive personal…ed.

9.3 Employees, agents…parties working on behalf of the Company may proc…data only when the performance of their job duties re…sonal data held by the Company cannot be processe…ons.

10. Accuracy of Data and Ke…

10.1 The Company sha…ployee personal data collected, processed, and held…nd up-to-date. This includes, but is not limited to, the r…ata at the request of an employee data subject, as set…

10.2 The accuracy of em…all be checked when it is collected and at **[**regular**] OR**…ervals thereafter. If any employee personal data is fou…t-of-date, all reasonable steps will be taken without de…at data, as appropriate.

10.3 It is the responsibili…e data subjects to ensure that the personal data they …ompany is kept up-to-date. If any such personal data…should ensure that the relevant member of staff a…rmed as soon as is reasonably possible. The Com…peration of its employees to help meet its obligations…aw.

11. Data Retention

11.1 The Company shal…rsonal data for any longer than is necessary in light …poses for which it was originally collected, held, and…

11.2 When employee pe…required, all reasonable steps will be taken to erase o…securely and without delay.

11.3 For full details of ach to data retention, including retention periods fo ypes held by the Company, please refer to our Data Re

12. Secure Processing

12.1 The Company shal ee personal data collected, held, and processed is k d against unauthorised or unlawful processing and ag destruction, or damage. Further details of the techn easures which are provided in Parts 29

12.2 All technical and or ken to protect employee personal data shall be regu aluated to ensure their ongoing effectiveness and th mployee personal data.

12.3 Data security must s by protecting the confidentiality, integrity, and availa sonal data as follows:

a) only those w ccess and use employee personal data and wh may access and use it;

b) employee pe urate and suitable for the purpose or purposes held, and processed; and

c) authorised u ble to access employee personal data as requ urpose or purposes.

13. Accountability and Reco

13.1 The Data Protectio nsible **[**, working together with the <<insert departmen or position, e.g. HR Manager>>,**]** for administering veloping and implementing any applicable related p or guidelines.

13.2 The Company shal sign' approach at all times when collecting, holding, ee personal data. Data Protection Impact Assessmen if any processing presents a significant risk to th f employee data subjects (please refer to Part 14 for f

13.3 All employees, age r parties working on behalf of the Company shall be g in data protection and privacy, addressing the rele rotection Law, this Policy, and all other applicable Co

13.4 The Company's da e shall be regularly reviewed and evaluated by means ts.

13.5 The Company sha records of all employee personal data collection, hol ich shall incorporate the following information:

a) the name ar y, its Data Protection Officer, and any applicab ers (including data processors and other data c sonal data is shared);

b) the purpose ny collects, holds, and processes employee pe

c) the Compa…ses (including, where applicable, consent, the …ning such consent, and records of such conse…ding, and processing employee personal dat…

d) details of the … personal data collected, held, and processed b… the categories of employee data subject to wh…elates;

e) details of an…personal data to non-UK countries including all …y safeguards;

f) details of ho…onal data will be retained by the Company (p…ny's Data Retention Policy);

g) details of em…rage, including location(s);

h) detailed des…al and organisational measures taken by the …he security of employee personal data.

14. **Data Protection Impact A…y by Design**

14.1 In accordance with …rinciples, the Company shall carry out Data Protection…r any and all new projects and/or new uses of emp…which involve the use of new technologies and w…lved is likely to result in a high risk to the rights and fre… subjects.

14.2 The principles of '…ld be followed at all times when collecting, holding, …yee personal data. The following factors should be ta…

a) the nature, s…ose or purposes of the collection, holding, and…

b) the state o…ant technical and organisational measures to…

c) the cost of in…res; and

d) the risks po… subjects and to the Company, including the…

14.3 Data Protection Imp…e overseen by the Data Protection Officer and shall ad…

a) the type(s) o…ta that will be collected, held, and processed;

b) the purpose(…ersonal data is to be used;

c) the Compan…

d) how employ… used;

e) the parties (i…who are to be consulted;

f) the necessit…he data processing with respect to the purpose(…ocessed;

g) risks posed t…s;

h) risks posed …mpany; and

i) proposed me handle identified risks.

15. **Keeping Data Subjects In**

15.1 The Company shall set out in Part 15.2 to every data employee data subj

a) Where emp collected directly from employee data subject a subjects will be informed of its purpose at t

b) where empl obtained from a third party, the relevant em be informed of its purpose:

i) if the o communicate with the employee data mmunication is made; or

ii) if the ansferred to another party, before that t

iii) as so le and in any event not more than one m data is obtained.

15.2 The following inform n the form of a privacy notice:

a) details of the t not limited to, all relevant contact details, and ntact details of any applicable representati on Officer;

b) the purpose e personal data is being collected and will be p Parts 23 to 28 of this Policy) and the lawful ba on and processing;

c) where appli rests upon which the Company is justifying its g of the employee personal data;

d) where the e is not obtained directly from the employee da es of personal data collected and processed;

e) where the e s to be transferred to one or more third parties,

f) where the e s to be transferred to a third party that is locate tails of that transfer, including but not limited t ce (see Part 36 of this Policy for further detail

g) details of ap eriods;

h) details of the s rights under the UK GDPR;

i) details of the s right to withdraw their consent to the Compan personal data at any time (where applicable);

j) details of t bject's right to complain to the Information

k) where the e is not obtained directly from the employee da the source of that personal data;

l) where appli gal or contractual requirement or obligation ne n and processing of the employee

personal dat sequences of failing to provide it; and

m) details of a making or profiling that will take place using data, including information on how decisions wi ance of those decisions, and any consequenc

16. **Data Subject Access**

16.1 Employee data sub access requests ("SARs") at any time to find out mor a which the Company holds about them, what it is doin , and why.

16.2 Employees wishing uld do using a Subject Access Request Form, sen mpany's Data Protection Officer at <<insert contact det

16.3 Responses to SAR ade within one month of receipt; however, this may wo months if the SAR is complex and/or numerous re ch additional time is required, the data subject shall b

16.4 All SARs received s Company's Data Protection Officer **[**in accordance with ubject Access Request Policy and Procedure**]**.

16.5 The Company does he handling of normal SARs. The Company reserves nable fees for additional copies of information that has to an employee data subject, and for requests that a or excessive, particularly where such requests are r

17. **Rectification of Personal**

17.1 Employee data subj quire the Company to rectify any of their personal data t mplete.

17.2 The Company shall sonal data in question, and inform the employee data cation, within one month of the employee data subj ny of the issue. The period can be extended by up to se of complex requests. If such additional time is re a subject shall be informed.

17.3 In the event that ar rsonal data has been disclosed to third parties, those d of any rectification that must be made to that perso

18. **Erasure of Personal Data**

18.1 Employee data sub equest that the Company erases the personal data it following circumstances:

a) it is no lon Company to hold that employee personal dat rpose(s) for which it was originally collected or

b) the employe to withdraw their consent (where applicable) g and processing their personal data;

c) the employe s to the Company holding and processing t there is no overriding legitimate interest to al tinue doing so) (see Part 21 of this Policy for fur he right to object);

d) the employe n processed unlawfully;

e) the employe s to be erased in order for the Company to legal obligation**[**;**]** **OR [**.**]**

f) **[**the employ eing held and processed for the purpose of p ety services to a child.**]**

18.2 Unless the Compa nds to refuse to erase employee personal data, all shall be complied with, and the employee data subj ure, within one month of receipt of the employee data s eriod can be extended by up to two months in the case uch additional time is required, the employee data subj

18.3 In the event that an a that is to be erased in response to an employee da s been disclosed to third parties, those parties shall b e (unless it is impossible or would require disproportio

19. **Restriction of Personal D**

19.1 Employee data subj ed circumstances, request that the Company ceases p data it holds about them. If an employee data subj est, the Company shall retain only the amount of emp ncerning that data subject (if any) that is necessary to l data in question is not processed further.

19.2 In the event that ar rsonal data has been disclosed to third parties, those d of the applicable restrictions on processing it (unles d require disproportionate effort to do so).

20. **[Data Portability**

20.1 The Company pr a relating to employees using automated means. ated processing>>.

20.2 Where employee d their consent to the Company to processing their p a manner, or the processing is otherwise required a contract between the Company and the employee d ata subjects have the right, under the UK GDPR, to re rsonal data and to use it for other purposes (namely t a controllers).

20.3 To facilitate the righ Company shall make available all applicable personal ubjects in the following format**[**s**]**:

a) <<list format

b) <<add furthe

20.4 Where technically by an employee data subject, personal data shall quired data controller.

20.5 All requests for co onal data shall be complied with within one month o ject's request. The period can be extended by up to t complex or numerous requests. If such additional time e data subject shall be informed.**]**

21. **Objections to Personal D**

21.1 Employee data sub bject to the Company processing their personal dat interests, for direct marketing (including profiling), ntific and/or historical research and statistics purposes.

21.2 Where an employe to the Company processing their personal data base ts, the Company shall cease such processing immedi demonstrated that the Company's legitimate grounds rride the employee data subject's interests, rights, an processing is necessary for the conduct of legal cla

21.3 Where an employe to the Company processing their personal data for d s, the Company shall cease such processing promptly

21.4 **[**Where an employe to the Company processing their personal data for s research and statistics purposes, the employee data UK GDPR, demonstrate grounds relating to his or h The Company is not required to comply if the resea performance of a task carried out for reasons of public

22. **[Automated Processing, aking, and Profiling**

22.1 **[**The Company use ning its employees in automated decision-making pr

a) <<Insert det n-making>>.**]**

22.2 **[**The Company us rning its employees for profiling purposes as follows

a) <<Insert det >.**]**

22.3 The activities desc e generally prohibited under Data Protection Law wh sions have a legal or similarly significant effect on e of the following applies:

a) the data sub cit consent;

b) the processi or

c) the process entry into, or performance of, a contract bet he data subject.

22.4 If special category processed in this manner, such processing can only he following applies:

a) the data sub cit consent; or

b) the processi ons of substantial public interest.

22.5 Where decisions a automated processing (including profiling), employee right to object, to challenge such decisions, request h press their own point of view, and to obtain an explar om the Company. Employee data subjects must be ex ght at the first point of contact.

22.6 In addition to the ab ust be provided to employee data subjects explaining decision-making or profiling, and the significance and es of the decision or decisions.

22.7 When employee pe ny form of automated processing, automated decision following shall apply:

a) appropriate l procedures shall be used;

b) technical a sures shall be implemented to minimise the ccur, such measures must enable them to be e

c) all personal this manner shall be secured in order to pre cts arising (see Parts 29 to 34 of this Policy data security and organisational measures).**]**

23. Personal Data

The Company holds a r about its employees. Employee personal data shall be col sed in accordance with employee data subjects' rights and t s under Data Protection Law and with this Policy. The Comp nd process the employee personal data detailed in Parts 23 to tails of data retention, please refer to the Company's Data Ret

23.1 Identification inform es:

a) Name;

b) Contact Det

c) <<add furthe

23.2 Equal opportunities Please refer to Part 24, below, for further information):

a) Age;

b) Gender;

c) Ethnicity;

d) Nationality;

e) Religion;

f) <<add furthe

23.3 Health records (Ple w, for further information):

a) Details of sic

b) Medical con

c) Disabilities;

d) Prescribed n

e) <<add furthe

23.4 Employment record

a) Interview no

b) CVs, applica rs, and similar documents;

c) Assessment and similar documents;

d) Details of r alaries, pay increases, bonuses, commission, expenses;

e) Details of tra where applicable) **[**(please refer to Part 27, belo)**]**;

f) Employee m lease refer to Part 28, below, for further inform

g) Records of uding reports and warnings, both formal and i

h) Details of g cumentary evidence, notes from interviews, p outcomes;

i) <<add furthe

24. **Equal Opportunities Mon**

24.1 The Company coll sses certain information for the purposes of monit es. Some of the personal data collected for this pu ethnic origin and religious beliefs, falls within the UK ecial category data (see Part 2 of this Policy for a de e, such data will be anonymised. Where special cate ains, it will be collected, held, and processed strictly i conditions for processing special category personal rt 6.2 of this Policy. **[**No special category personal opportunities monitoring will be collected, held, or relevant employee data subject's consent.**]** **OR** **[**The sis for processing such data is <<insert lawful basi category data (as listed under Part 6.2)>>.**]**

24.2 **[**Non-anonymised nitoring information**]** **OR** **[**Equal opportunities monit be accessible and used only by <<insert departmen and shall not be revealed to other employees, agents parties working on behalf of the Company **[**without the employee data subject(s) to whom such data r otional circumstances where it is necessary to prote of the employee data subject(s) concerned, and suc one or more of the conditions set out in Part 6.2 of thi

24.3 Equal opportunities will only be collected, held, and processed to the vent, reduce, and stop unlawful discrimination in l Act 2010, and to ensure that recruitment, promo ment, assessment, benefits, pay, terms and conditi edundancy, and dismissals are

determined on the lifications, experience, skills, and productivity.

24.4 Employee data sub quest that the Company does not keep equal opportu tion about them. All requests must be made in writing ert name(s) and/or position(s) and contact details>>.

25. **Health Records**

25.1 The Company holds employee data subjects which are used to assess th d welfare of employees and to highlight any issues her investigation. In particular, the Company places a taining health and safety in the workplace, on prom , and on preventing discrimination on the grounds of d conditions. In most cases, health data on employees PR's definition of special category data (see Part 2 o tion). Any and all data relating to employee data su e, will be collected, held, and processed strictly i conditions for processing special category personal rt 6.2 of this Policy. **[**No special category personal held, or processed without the relevant employee consent.**]** **OR [**The Company's lawful basis for proc th data is <<insert lawful basis for processing special nder Part 6.2)>>.**]**

25.2 Health records sha d only by <<insert department(s) and/or position(s)> aled to other employees, agents, contractors, or othe half of the Company **[**without the express consent of ect(s) to whom such data relates**]**, except in exception it is necessary to protect the vital interests of the emp ncerned, and such circumstances satisfy one or more in Part 6.2 of this Policy.

25.3 Health records wil d, and processed to the extent required to ensure e to perform their work correctly, legally, safely, and v impediments or discrimination.

25.4 Employee data sub quest that the Company does not keep health record requests must be made in writing and addressed to < osition(s) and contact details>>.

26. **Benefits**

26.1 In cases where emp enrolled in benefit schemes which are provided by the cessary from time to time for third party organisations ta from relevant employee data subjects.

26.2 Prior to the collect loyee data subjects will be fully informed of the pe be collected, the reasons for its collection, and the v processed, as per the information requirements set ou .

26.3 The Company sha rsonal data except insofar as is necessary in the ad nt benefits schemes.

26.4 The following sche ployees. Please note that not all

schemes may be ap s:

a) <<Insert na eme>>. For further information, please cont (s), position(s), and/or third-party organisation sonal data may be collected, held, and process

i) <<ins and its purpose>>;

ii) <<ad d>>.

b) **[**<<Add furth >>.**]**

27. **[Trade Unions**

27.1 The Company will ersonal data concerning relevant employee data sub e unions where those unions are recognised by the C , information about an individual's trade union memb UK GDPR's definition of special category data (see or a definition). Any and all data relating to employe ion membership, therefore, will be collected, held, and ccordance with the conditions for processing special as set out in Part 6.2 of this Policy. **[**No special catego e collected, held, or processed without the relevan ct's express consent.**]** **OR** **[**The Company's lawful b cial category data relating to trade unions is <<insert l g special category data (as listed under Part 6.2)>>.**]** e collected and supplied:

a) Name;

b) Job descript

c) <<insert type purpose>>;

d) <<add furthe

27.2 All employee data s o request that the Company does not supply their pe ons and shall be informed of that right before any suc

28. **Employee Monitoring**

28.1 The Company may or the activities of employee data subjects. Such mor will not necessarily be limited to, internet and email that monitoring of any kind is to take place (unless ces, such as the investigation of criminal activity or verity, justify covert monitoring), employee data subj the exact nature of the monitoring in advance.

28.2 Monitoring should r circumstances justify it, as above) interfere with an em

28.3 Monitoring will only ny considers that it is necessary to achieve the benefit e. Personal data collected during any such monitorin held, and processed for reasons directly related to (a ving the intended result and, at all times, in accordanc ubjects' rights and the Company's obligations under D

28.4 The Company sha… no unnecessary intrusion upon employee data subj… cations or activities, and under no circumstances will … outside of an employee data subject's normal p… ours, unless the employee data subject in question … pment or other facilities including, but not limited to, C… npany intranet, or a virtual private network ("VPN") ser… mpany for employee use.

29. **Data Security - Transferri… Communications**

The Company shall ensure… sures are taken with respect to all communications and other … oyee personal data:

29.1 All emails containi… data must be encrypted **[**using <<insert type(s) of e…

29.2 All emails containin… a must be marked "confidential";

29.3 Employee persona… tted over secure networks only; transmission over u… permitted in any circumstances;

29.4 Employee personal… mitted over a wireless network if there is a wired alte… practicable;

29.5 Employee personal… body of an email, whether sent or received, should be… of that email and stored securely. The email itself sh… porary files associated therewith should also be dele… od of deletion>>**]**;

29.6 Where employee p… ent by facsimile transmission the recipient should be… f the transmission and should be waiting by the fax m… a;

29.7 Where employee pe… sferred in hardcopy form it should be passed directly … t using <<insert name(s) and/or type(s) of delivery s…

29.8 All employee perso… d physically, whether in hardcopy form or on remova… hall be transferred in a suitable container marked "c…

29.9 **[**<<Add further secu… d>>.**]**

30. **Data Security - Storage**

The Company shall ensure… ures are taken with respect to the storage of employee perso…

30.1 All electronic copie… data should be stored securely using passwords an… cryption>>**]** data encryption;

30.2 All hardcopies of e… along with any electronic copies stored on physical, … d be stored securely in a locked box, drawer, cabine…

30.3 All employee perso… cally should be backed up <<insert interval>> with bac… **D/OR [**offsite**]**. All backups should be encrypted **[**using … yption>>**]**;

30.4 No employee perso… d on any mobile device (including, but not limited to, … artphones), whether such device

belongs to the Com out the formal written approval of <<insert name(s) a tact details>> and, in the event of such approval, str n all instructions and limitations described at the t ven, and for no longer than is absolutely necessa

30.5 No employee pers nsferred to any device personally belonging to an em r, or other party working on behalf of the Company a data may only be transferred to devices belonging t other parties working on behalf of the Company where as agreed to comply fully with the letter and spirit of Protection Law, including but not limited to the UK G le demonstrating to the Company that all suitable tech measures have been taken);

30.6 **[**<<Add further secu d>>.**]**

31. **Data Security - Disposal**

When any employee pers or otherwise disposed of for any reason (including where co d are no longer needed), it should be securely deleted and information on the deletion and disposal of personal data, p any's Data Retention Policy.

32. **Data Security - Use of Pe**

The Company shall ensure ures are taken with respect to the use of employee personal

32.1 No employee pers d informally and if an employee, agent, contractor, c behalf of the Company requires access to any emp they do not already have access to, such access sh ted from <<insert name(s) and/or position(s) and cont

32.2 No employee pers sferred to any employee, agent, contractor, or other rties are working on behalf of the Company or not, ion of <<insert name(s) and/or position(s) and cont

32.3 Employee personal th care at all times and should not be left unattended d employees, agents, contractors, or other parties at a

32.4 If employee perso d on a computer screen and the computer in questi d for any period of time, the user must lock the comp aving it;

32.5 **[**Where employee p e Company is used for marketing purposes, it shall be nsert position>> to ensure that the appropriate consen no employee data subjects have opted out, whether y service such as the TPS;**]**

32.6 **[**<<Add further secu d>>.**]**

33. **Data Security - IT Securit**

The Company shall ensure sures are taken with respect to IT

and information security:

33.1 All passwords used ersonal data should be changed regularly and shoul ses that can be easily guessed or otherwise compro must contain a combination of uppercase and low and symbols. **[**All software used by the Company is passwords.**]**;

33.2 Under no circumst words be written down or shared between any empl ors, or other parties working on behalf of the Comp ority or department. If a password is forgotten, it must cable method. IT staff do not have access to password

33.3 All software (includi plications and operating systems) shall be kept up-t IT staff shall be responsible for installing any and dates **[**not more than <<insert period>> after th available by the publisher or manufacturer**] OR [** and practically possible**] [**, unless there are valid techn **]**;

33.4 No software may b mpany-owned computer or device without the prior ap partment or position>>;

33.5 **[**<<Add further secu d>>.**]**

34. **Organisational Measures**

The Company shall ensure ures are taken with respect to the collection, holding, and pro sonal data:

34.1 All employees, age r parties working on behalf of the Company shall be their individual responsibilities and the Company's res a Protection Law and under this Policy, and shall be his Policy;

34.2 Only employees, ag er parties working on behalf of the Company that need employee personal data in order to carry out their ass shall have access to employee personal data held

34.3 All sharing of emp hall comply with the information provided to the rele jects and, if required, the consent of such data subje or to the sharing of their personal data;

34.4 All employees, age r parties working on behalf of the Company handling will be appropriately trained to do so;

34.5 All employees, age r parties working on behalf of the Company handling will be appropriately supervised;

34.6 All employees, age r parties working on behalf of the Company handling shall be required and encouraged to exercise care, ca en discussing work-related matters that relate to emplo er in the workplace or otherwise;

34.7 Methods of collecti sing employee personal data shall be regularly evaluat

34.8 All employee pers… e Company shall be reviewed periodically, as set … a Retention Policy;

34.9 The performance … ents, contractors, or other parties working on behalf … employee personal data shall be regularly evaluated …

34.10 All employees, age… r parties working on behalf of the Company handling … ata will be bound to do so in accordance with th… rotection Law and this Policy by contract;

34.11 All agents, contract… rking on behalf of the Company handling employee… nsure that any and all of their employees who are… ng of employee personal data are held to the same … vant employees of the Company arising out of this Po… Law;

34.12 Where any agent, … working on behalf of the Company handling employee… heir obligations under this Policy, that party shall inde… s the Company against any costs, liability, damages, … ings which may arise out of that failure;

34.13 **[**<<Add further orga… equired>>.**]**

35. Sharing Personal Data

35.1 The Company may… personal data with third parties if specific safeguards …

35.2 Employee personal… ed with other employees, agents, contractors, or othe… alf of the Company if the recipient has a legitimate, job… f any employee personal data is to be shared with a th… of the UK, the provisions of Part 36, below, shall also…

35.3 Where a third-part… ed, that processor shall process personal data on … (as data controller) only on the written instruction of…

35.4 Employee personal… d with third parties in the following circumstances:

a) the third pa… d to know the information for the purpose of p… Company under a contract;

b) the sharing … al data concerned complies with the privacy n… ected employee data subjects (see Part 15 fo… nd, if required, the employees concerned h… aring of their personal data;

c) the third-par… to comply with all applicable data security sta… rocedures, and has put in place adequate se… ct the employee personal data;

d) (where appli… lies with any cross-border transfer restrictions (…

e) a fully execu ontaining data processing clauses compliant w has been entered into with the third-party re

36. **Transferring Personal Da the UK**

36.1 The Company may ansfer ('transfer' includes making available remotely) a to countries outside of the UK. The UK GDPR res order to ensure that the level of protection given to romised.

36.2 Employee personal erred to a country outside the UK if one of the following

a) The UK has rming that the country in question ensures an ection (referred to as 'adequacy decisions' o . From 1 January 2021, transfers of personal EA countries will continue to be permitted. T e also in place to recognise pre-existing EU e UK.

b) Appropriate including binding corporate rules, standard co ed for use in the UK (this includes those adopte mission prior to 1 January 2021), an approved pproved certification mechanism.

c) The transfe rmed and explicit consent of the relevant emp

d) The transfer he other reasons set out in the UK GDPR inclu a contract between the employee data subjec public interest reasons; for the establishme of legal claims; to protect the vital interests of bject where the employee data subject is ph ble of giving consent; or, in limited circumstanc gitimate interests.

37. **Data Breach Notification**

37.1 All personal data mployee personal data must be reported immediate Protection Officer.

37.2 If an employee, ag r party working on behalf of the Company becomes that a personal data breach has occurred, they mus igate it themselves. Any and all evidence relating to ch in question should be carefully retained.

37.3 If a personal data b reach is likely to result in a risk to the rights and freed ubjects (e.g. financial loss, breach of confidentiality, nal damage, or other significant social or economic ection Officer must ensure that the Information Commi med of the breach without delay, and in any event, w g become aware of it.

37.4 In the event that a p kely to result in a high risk (that is, a higher risk than th 37.3) to the rights and freedoms of employee data sul tion Officer must ensure that all

affected employee rmed of the breach directly and without undue delay

37.5 Data breach notifica llowing information:

a) The categori ber of data subjects concerned;

b) The categor umber of personal data records concerned;

c) The name a Company's data protection officer (or other cor formation can be obtained);

d) The likely co h;

e) Details of t proposed to be taken, by the Company t n including, where appropriate, measures to erse effects.

38. **Implementation of Policy**

This Policy shall be deem ert date>>. No part of this Policy shall have retroactive effec nly to matters occurring on or after this date.

This Policy has been approved an

Name: <<insert

Position: <<insert

Date: <<insert

Due for Review by: <<insert

Signature: