



Seetec

Employee Privacy Notice (Including Volunteers)

This policy relates to: Seetec Group

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1.0 Introduction & Scope

We, Seetec Group (comprising of every business area) are committed to protecting your privacy and promise to collect, process, and share your data lawfully, and securely in connection with your employment with us, or if you are engaged with us as a Volunteer. Our Employee and Volunteer Privacy Notice tells you how we do this and explains your rights. Any personal data processed in line with our Privacy Notice is controlled by us, as the data controller.

We want you to be confident that your personal data will be kept safe and secure whilst in our care, that's why we will always tell you what data we collect and how we use it.

We will never sell your personal information to third parties.

Your data is important to us, it is protected and stored securely by industry best practice, systems, and processes. We are committed to maintaining the confidentiality, integrity, and availability of your personal information at all times.

This privacy notice explains what personal information Seetec processes about you and the lawful basis for doing so. It also covers information storage, retention, and data sharing.

2.0 Information we collect about you

This privacy notice tells you what to expect when Seetec collects personal information. It applies to

- We collect all or some of the following personal information during the application process. This may include your name, address, NINO/PPS number, email address, telephone number(s), title, date of birth, bank and next of kin details. We may collect some of this contact information when you interact with us during the on-boarding process and subsequently during your employment, or period of volunteering, with us.
- Details (and copies) of your communications and interactions with us via our Shared Services Teams, including HR, Payroll, DTS, including by email, telephone (voice recordings) post and the Ivanti portal. In respect of volunteers this will be through Better Impact (external volunteer recruitment service).
- Copies of documents you provide as proof of your identity (e.g., driving licence, and passport) when you are initially employed or appointed by us, or where there is a legal reason to request these documents from you during the term of your employment/service.
- Information about how you use our systems, applications, and websites.
- We obtain and retain certificate numbers in relation to any criminal history or convictions as part of our background checks conducted at commencement, and when necessary, during your employment or service with us.
- Details of any business or personal conflict of interest, (e.g., personal connection with a supplier/prospective supplier), at commencement and at regular intervals during your employment or service with us.
- Technical information about your device or browser when you use our website, including geolocation data to determine what country you are accessing our website from. Your device ID, browser type and version and time zone setting, and if applicable, which websites you were redirected from. For further information please refer to our Cookie Policy.

- We may receive personal data directly from you or from various third parties and public sources, including from social media channels (if you interact with us through those channels), or other third parties such as previous employers or recruitment agencies.
- When required we will receive personal data from third party organisations involved in Occupational Health assessments, or from your GP (with your explicit consent).

3.0 How and why, we use your personal data

We have set out the primary ways we use your personal data, and why in the table below. We have also identified the lawful basis for this processing.

In most cases the processing of your personal data is necessary to fulfil our obligations under your contract of employment or volunteer agreement, or to comply with our legal or statutory requirements.

Category	Personal Data processed	How we use your personal data	Why we use your personal data	Where your data is stored	Retention period
Employment-Recruitment	Registration to join talent pool (name and contact details)	Candidate required to enter information via website to join talent pool. Candidates can request for their data to be deleted at any time.	Part of the recruitment process. <i>(Legitimate interest/ Contractual obligation)</i>	SuccessFactors	Two years
Volunteers	Registration to join as a volunteer via Better Impact (online recruitment service)	To contact you and process your application to join us as a Volunteer	Part of the appointment /recruitment process <i>(Legitimate interest/ Contractual obligation)</i>	Better Impact	In line with Better Impact Privacy Policy. You will be able to manage your data and delete your account at anytime
Employment-Recruitment Volunteers	Successful Applicants – Volunteers -Pre-Employment/appointment information, work history, references received, Qualifications	Completed once invited to interview.	Used for pre-employment/ appointment checks. <i>(Contractual obligation)</i>	Restricted HR shared folder and SuccessFactors Volunteer data will also be held on Better Impact (volunteer recruitment provider)	retained for six years post-employment/ service
Employment-Recruitment	Interview notes	To score the individual skills and experience and to record the meeting.	Part of the recruitment process. <i>(Legitimate interest)</i>	Line manager, restricted HR shared folder and SuccessFactors	12 months in line with CIPD guidance

Employment-Recruitment Volunteer	ID / Right to work documentation	Collected to assist in the right to work and identity checking process.	Evidence to show eligibility to work and verification of identity. <i>(Contractual and Legal obligation)</i>	Restricted HR shared folder and SuccessFactors	Three months post-employment/ services
Employment-Recruitment Volunteers	Bank details	Payment of money to employee/ volunteer	To enable payment of salary and expenses. <i>(Contractual Obligation)</i>	SuccessFactors / Payroll & Expenses systems	six years -post employment (payroll) – 3 months post-employment/ service
Employment-Recruitment Volunteer	Next of Kin	Contact used in the event of an incident/ emergency involving employee	Emergency contact for the care and safety of employee. <i>(Contractual & Legal Obligation)</i>	SuccessFactors-employees Better Impact-Volunteers	For employment/ service period only – (Not retained post-employment)
Employment-Recruitment Volunteer	Photographic records (for ID badge, intranet, publications)	To identify individuals as Seetec colleagues, i.e., ID badges	For verification of employment status and position and for access control to Seetec premises <i>(Legitimate interest)</i>	SuccessFactors	Retained for three months post-employment/ service
Employment-Recruitment	Sick certificates & other medical information	Management of sickness and absence	Employee/ volunteer welfare and for employer statutory duties <i>(Legal obligation)</i>	Restricted Payroll and HR	In line with CIPD guidance and relevant legislation, record dependent
Employment Recruitment	Pension Records	Pension related activities	To enable employer to discharge <i>Legal Obligations</i>	Restricted Payroll shared folder	75 years post-employment
Employment-Recruitment	Insurance Information	Insurance related activities	To enable employer to discharge <i>Contractual and Legal obligations</i>	Restricted Payroll shared folder	In line with CIPD guidance, policy requirements and relevant legislation, record dependent

Employment-Recruitment Volunteer	BPSS/DBS background checks	To conduct background checks	Employer requirement (<i>Contractual and Legal obligation</i>)	Restricted HR shared folder	six years post-employment/ service
Employment-Recruitment Volunteer	Conflict of Interest declaration and register	To provide assurance to the business and employees.	To protect the business and potentially vulnerable employees. (<i>Legitimate interest</i>)	Restricted HR shared folder and/or CRC E&E Restricted shared folders	Retained for 3 months post-employment/ service
Employment Recruitment	Telematics/ GPS data	To ensure driver well-being and monitor-improve vehicle usage statistics	to protect the business and employees' (<i>Legitimate interest</i>)	Restricted Shared folder	185 days
Employment-Recruitment Volunteer	Telephone Voice Recordings	All calls through Seetec contact centres are recorded	For quality, monitoring and training purposes (<i>Legitimate Interest</i>)	Stored in secure UK based data centres. E&S(Ireland) data is stored in Ireland	Standard retention is 45 days unless required for training or investigation purposes
Employment-Recruitment Volunteer	Images captured by CCTV	CCTV installed on some Seetec sites for safety and security purposes	To protect individuals and property (<i>Legitimate Interest</i>)	Internal and cloud-based systems, restricted access	30 days, unless required for investigation purposes

Where your personal information is held in SuccessFactors/Payroll Self Service or Better Impact (Volunteers only) – it is your responsibility to ensure that the information (such as your address, contact details, bank account and next of kin) is kept up to date. If you're not sure how to do this, speak to your line manager/volunteer coordinator or HR for advice.

4.0 Sharing your personal information

We may be required to share your personal data with all or some of the following trusted third parties: -

- HMRC for tax purposes, as an employer it is our legal obligation to provide this information.
- Payroll and pension providers as part of your contract of employment and our legal obligations
- Stakeholders and commissioners where your role is in conjunction with a contract being delivered by one or more parts of the organisation.
- Cloud providers of software systems and solutions used by the group in connection with the fulfilment of your contract of employment or your volunteer agreement, (including but not limited to people management, payroll, pensions, insurance, vetting/background checks, expenses, and compliance).
- Professional advisers including lawyers, medical professionals, bankers, auditors and insurers – for the purposes of providing consultancy, legal, insurance and accounting services.
- Police, Garda, or other such regulatory authorities – as part of an investigation or for legal or regulatory purposes.
- Auditors – to audit our systems and processes for the purposes of ensuring efficiency, or regulatory or contractual compliance.
- UK and Irish law enforcement agencies and third-party security companies – for the purposes of ensuring that we comply with the law and have adequate security measures in place.
- Registered service or benefit providers, such as Benni (employee benefits) or Verifile, to obtain DBS checks (pre-and during employment/engagement) or in respect of volunteers with Better Impact (recruitment provider)
- Approved External Training providers, to enable the registration process (name and business email address only).
- We will disclose your personal information to third parties if we are under a duty to disclose or share your personal data to comply with any other legal or regulatory obligation or request.

5.0 Data Retention

- We will only keep your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal or contractual requirements.
- At the end of that retention period, your data will either be deleted or anonymised (so that it can no longer be associated with you) for research or statistical purposes.
- To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
- In some circumstances you may be entitled to ask us to delete your data: see 'Data Subject rights' below for further information.
- If you become a Volunteer your personal data will also be processed by Better Impact Volunteer Management Solution. Please refer to their Privacy Notice. [MyImpactPage.com Privacy Policy | Site Guide \(betterimpact.com\)](https://www.betterimpact.com/Privacy-Policy).

6.0 How we protect your personal data

We have put appropriate technical and organisational measures in place to protect your personal data:

- We are independently certified to a number of industry recognised standards, including ISO27001:2013 which helps us maintain the highest levels of security across our entire business.
- Our security controls are designed to maintain the Confidentiality, Integrity & Availability of your personal information always.
- Our group-wide staff training and awareness portfolio covers key risk areas and specific controls associated with your role.
- Wherever possible, we ensure the online cloud services are accessed using HTTPS rather than HTTP, meaning that all information that is sent and received over the internet is encrypted for additional security. You can see this in the address bar of your browser.
- We have selected and deployed technical measures such as password complexity requirements, anti-virus and anti-malware software, firewalls, encryption, email and internet filtering and VPNs for secure remote access.
- We have implemented soft controls such as our Information Security Policy, Data Protection Policy and Framework, Clear Desk and Clear Screen policies, the Individual User Agreement and Mobile Devices policy.
- As described in this Privacy Notice, where we disclose your personal data to third parties. we require the third party to have appropriate technical and organisational measures in place to protect your personal data, via robust contracts and agreements. In some instances, we may be compelled by law to disclose your personal data to a third party and have limited control over how it is protected by that party.
- Our systems and technical security controls are regularly audited by independent auditors to ensure we maintain our security accreditations.
- All employee personal data is not processed or transferred outside of the European Economic Area (EEA).
- Volunteers data is processed in accordance with Better Impact's Privacy Notice [MyImpactPage.com Privacy Policy](https://www.betterimpact.com/MyImpactPage.com/PrivacyPolicy) | [Site Guide \(betterimpact.com\)](https://www.betterimpact.com/SiteGuide)

7.0 Data Subject Rights

You have the right:

- to ask us not to use your personal data for direct marketing.
- to ask us not to process your personal data where it is processed on the basis of legitimate interests, if there are no compelling reasons for that processing.
- to request from us access to personal information held about you (see below).
- to ask for the information we hold about you to be rectified if it is inaccurate or incomplete.
- to ask that we stop any consent-based processing of your personal data after you withdraw that consent.
- to ask, in certain circumstances, to delete the personal data we hold about you.
- to ask, in certain circumstances, for the processing of that information to be restricted.
- to ask, in certain circumstances, for data portability.

If you wish to exercise your data subject rights, please refer to our Data Subject Rights Procedure (including DSARS) which is available on our intranet, or available on request. Requests should be made to the Data Protection Team - dataprotection@seetec.co.uk

8.0 Get in touch with us

If you have any questions or concerns about this Privacy Notice, or require assistance with any data protection matter, please contact the Data Protection Officer:

By post to:

Data Protection Officer
Seetec Group,
75-77 Main Road,
Hockley,
Essex,
SS5 4RG

By email to: **dataprotection@seetec.co.uk**

You can contact the Supervisory Authority for data protection advice and have the right to complain to the Information Commissioners Office (ICO) in the UK or the Data Protection Commissioner (DPC) In Ireland if you remain dissatisfied about how Seetec processes your personal data.

The ICO contact details are available here: <https://ico.org.uk/concerns/>

The DPC contact details are available here:

[Raising a concern with the commission | Data Protection Commissioner](#)

9.0 Associated Documents

These documents should be referenced in conjunction with this framework

- Data Protection Policy
- Data Protection Framework
- Internet Privacy Notice
- Internet Cookie Notice
- Data-Document Retention and Archiving Policy
- Data Subject Rights Procedure
- 'Emailing of Sensitive Data' guidance
- Individual User Agreement
- Better Impact Privacy Notice (for Volunteers only)

Further guidance can be found in the Group SharePoint site, under the Document Repository, within the folders: Documents \ Resource Hub \ Information Security \ Data Protection.

SharePoint Link:

<https://seetecgroup.sharepoint.com/sites/DocumentsRepository/Shared%20Documents/Forms/AllItems.aspx?newTargetListUrl=%2Fsites%2FDocumentsRepository%2FShared%20Documents&viewpath=%2Fsites%2FDocumentsRepository%2FShared%20Documents%2FForms%2FAllItems%2Easpx&isAscending=true&id=%2Fsites%2FDocumentsRepository%2FShared%20Documents%2FResource%20Hub%2FInformation%20Security%2FData%20Protection&sortField=LinkFilename&viewid=80cfe63c%2Da1fc%2D4043%2D9978%2D0a038dbf78>

10.0 Document Control

Change history and sign off information


10.1 Version Control

Record of Amendment		
Version Number	Date of Issue	Detail of Change
1.1	28/09/2018	Added Conflicts of Interest and updated KSSCRC email address
2.0	01/08/2020	Added Seetec Pluss, telematic data and updated systems. New template created
2.1	27/10/2021	Annual review, added Interventions Alliance, removed CRCs and added Archiving Policy
3.0	01/12/2022	Added DBS checks, voice recordings and CCTV images. Data retention details included. Removed categories of personal data no longer processed (e.g., gender), Updated Associated Documents
3.1	15/10/2023	Updated to include Volunteers

10.2 Next Review Date

The next scheduled review of this document will be October 2024.

10.3 Document Authorisation

Authorisation	
Name and Position	Authorisation Details
Jon Trickey Head of Information & Cyber Security	JCTrickey E-signed 2023-10-19 01:17PM GMT+1 jon.trickey@seetec.co.uk 

Signature: JCTrickey
JCTrickey (Oct 19, 2023 13:17 GMT+1)

Email: jon.trickey@seetec.co.uk

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Final Audit Report

2023-10-19

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 Signer jon.trickey@seetec.co.uk entered name at signing as JCTrickey

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 Document e-signed by JCTrickey (jon.trickey@seetec.co.uk)

Signature Date: 2023-10-19 - 12:17:53 GMT - Time Source: server

 Agreement completed.

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