

# Employee Privacy Policy

**Document ID:** COM-DP-010 **Effective Date:** January 1, 2024 **Last Updated:** February 2024 **Owner:** Legal & Compliance **Applies To:** All Employees

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## Overview

This policy explains what personal information NovaTech collects about employees, how we use it, and your rights regarding that information.

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## Information We Collect

### During Recruitment

- Name and contact information
- Resume/CV and work history
- Educational background
- Interview notes and assessments
- References
- Right-to-work documentation

### During Employment

**Identity Information:** - Legal name, preferred name - Date of birth - Government ID numbers (SSN, etc.) - Photographs

**Contact Information:** - Home address - Phone numbers - Personal email (emergency contact) - Emergency contacts

**Employment Information:** - Job title and department - Start date and tenure - Compensation and benefits elections - Performance reviews - Disciplinary records - Training records

**Financial Information:** - Bank account for payroll - Tax withholding elections - Stock grant information - Expense reports

**IT Information:** - Account credentials (hashed) - Device assignments - Access logs - Email and communication metadata

**Health Information (limited):** - Benefits enrollment data - Accommodation requests - Leave certifications - Workers' compensation claims

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## How We Use Information

### Business Operations

- Process payroll and benefits
- Manage performance and development
- Facilitate communication
- Comply with legal obligations
- Maintain security

### Specific Uses

Purpose	Examples
Payroll	Process salary, taxes, deductions
Benefits	Administer health, 401k, other benefits
Performance	Conduct reviews, plan development
Security	Access control, monitoring
Legal	Respond to audits, legal proceedings
Communication	Company announcements, work coordination

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## Information Sharing

### Internal Sharing

Your information may be accessed by: - HR (full access as needed) - Your manager (performance, attendance, job info) - Finance (payroll, expenses) - IT (account, device info) - Legal (as needed for legal matters)

### External Sharing

We share information with: - **Benefits providers:** Health insurance, 401k - **Payroll processors:** Payroll service - **Government agencies:** Tax authorities, regulatory bodies - **Background check providers:** As consented - **Legal counsel:** When required - **Auditors:** For compliance audits

We do not sell employee personal information.

## Legal Requirements

We may disclose information when: - Required by law - Responding to legal process - Protecting our rights - Investigating violations - Ensuring safety

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## Security

We protect employee information through:

**Technical Measures:** - Encryption of sensitive data - Access controls - Secure systems and networks - Regular security assessments

**Administrative Measures:** - Access limited to those with need - Training on data protection - Confidentiality agreements - Vendor security requirements

**Physical Measures:** - Secure facilities - Controlled access - Document security

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## Retention

We retain employee information according to:

Data Type	Retention Period
Personnel file	Employment + 7 years
Payroll records	7 years
Benefits records	6 years after plan year
I-9 forms	3 years after hire or 1 year after termination
Tax records	7 years
Recruitment (not hired)	3 years

After retention period, data is securely destroyed.

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## Your Rights

### Access

You may request to see personal information we hold about you.

**How to request:** 1. Email [hr@novatech.com](mailto:hr@novatech.com) 2. Specify information requested 3. We'll respond within 30 days

## **Correction**

You may request correction of inaccurate information.

**How to request:** 1. Email [hr@novatech.com](mailto:hr@novatech.com) 2. Identify information to correct  
3. Provide correct information 4. We'll update and confirm

## **Workday Self-Service**

Many updates can be made directly: - Contact information - Emergency contacts - Tax withholding - Benefits elections (during enrollment)

## **Deletion**

Limited deletion rights exist for employees: - Recruitment data (if not hired) - After retention period expires - Subject to legal obligations

## **Data Portability**

You may request a copy of your data in a portable format for certain categories.

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## **Monitoring**

### **What We Monitor**

NovaTech may monitor: - Email (metadata, content in some cases) - Internet usage - Access logs - Computer activity on company devices - Phone systems (call logs, not content) - Physical access (badge logs) - Video surveillance (common areas only)

### **Why We Monitor**

- Security and data protection
- Policy compliance
- Legal and regulatory requirements
- System performance
- Investigation of misconduct

## Your Expectations

- Limited privacy expectation on company systems
  - Personal use may still be monitored
  - Monitoring is not targeted at individuals unless investigating
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## International Transfers

If you're employed outside the US, your data may be transferred to the US for:  
- Centralized HR systems - Global payroll processing - IT services

We implement appropriate safeguards for such transfers including: - Standard contractual clauses - Data protection agreements - Security requirements

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## California Employees (CCPA/CPRA)

California employees have additional rights:

**Right to Know:** Categories and specific pieces of PI collected **Right to Delete:** Subject to employment-related exceptions **Right to Correct:** Inaccurate personal information **Right to Limit:** Use of sensitive personal information **No Discrimination:** For exercising rights

Most employment data is exempt from CCPA, but we honor requests where applicable.

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## European Employees (GDPR)

If you're employed in the EU/EEA:

**Legal Bases:** - Contract performance (employment) - Legal obligations (tax, employment law) - Legitimate interests (business operations) - Consent (where required)

**Additional Rights:** - Right to be informed - Right of access - Right to rectification - Right to erasure (limited in employment) - Right to restrict processing - Right to data portability - Right to object - Rights regarding automated decisions

**Data Protection Officer:** [dpo@novatech.com](mailto:dpo@novatech.com)

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## Changes to This Policy

We may update this policy periodically. Material changes will be communicated via email or company announcement.

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## Questions and Concerns

For privacy questions: - HR: [hr@novatech.com](mailto:hr@novatech.com) - Legal: [privacy@novatech.com](mailto:privacy@novatech.com)  
- DPO (EU): [dpo@novatech.com](mailto:dpo@novatech.com)

To report privacy concerns: - Ethics hotline: [ethics.novatech.com](https://ethics.novatech.com) - Email: [privacy@novatech.com](mailto:privacy@novatech.com)

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*Related Documents: Data Classification Policy (IT-SEC-005), Acceptable Use Policy (IT-SEC-015), Data Retention Policy (COM-DP-005)*