



Innovation Meets Expertise

**PRIVACY NOTICE – EMPLOYEES, WORKERS AND
CONTRACTORS**

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DOCUMENT CONTROL

DOCUMENT NAME	Privacy Notice – Employees, Workers & Contractors
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AUTHORISATION

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TABLE OF CONTENTS

1. PURPOSE	4
2. DATA PROTECTION PRINCIPLES	4
3. THE KIND OF INFORMATION WE HOLD ABOUT YOU.....	5
4. HOW IS YOUR PERSONAL INFORMATION COLLECTED?.....	6
5. HOW WE WILL USE INFORMATION ABOUT YOU	6
6. SITUATIONS IN WHICH WE WILL USE YOUR INFORMATION	7
7. HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION ...	8
8. OUR OBLIGATIONS AS AN EMPLOYER.....	9
9. INFORMATION ABOUT CRIMINAL COVICTIONS.....	9
10. DO WE NEED YOUR CONSENT?	10
11. IF YOU FAIL TO POVIDE PERSONAL INFORMATION	10
12. CHANGE OF PURPOSE.....	10
13. AUTOMATED DECISION-MAKING	11
14. DATA SHARING	11
15. DATA SECURITY	12
16. DATA RETENTION.....	13
17. RIGHTS OF ACCESS, CORRECTION, ERASURE AND RESTRICTION	13
18. RIGHT TO WITHDRAW CONSENT	15
19. DATA PROTECTION OFFICER.....	15
20. CHANGES TO THIS PRIVACY NOTICE	15

1. PURPOSE

Invenio Business Solutions Limited (the “Company”) is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your working relationship with us.

It applies to all current and former employees, workers and contractors.

The Company is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to current and former employees, workers and contractors. This notice does not form part of any contract of employment or other contract to provide services. We reserve the right to update this notice at any time and will provide you with a new privacy notice when we make any substantial changes. We may also notify you in other ways from time to time about the processing of our personal information.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Further information on how the Company complies with its data protection obligations and individuals’ rights and obligations in relation to the processing of personal data whilst working for or on behalf of the Company can be found in our Data Protection Policy.

2. DATA PROTECTION PRINCIPLES

We will comply with data protection law. This says that the personal information we hold about you must be:

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

3. THE KIND OF INFORMATION WE HOLD ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are “special categories” of more sensitive personal data which require a higher level of protection.

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

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Gender.
- Marital status and dependants.
- Next of kin and emergency contact information.
- National Insurance number.
- Bank account details, payroll records and tax status information.
- Salary, annual leave, pension and benefits information and other terms and conditions of your employment.
- Start date.
- Location of employment or workplace.
- Photo Identification from Government agency and address proof.
- Recruitment information (including copies of right to work documentation, references, details of your qualifications, skills, experience and employment history and other information included in a CV or cover letter or as part of the application process).
- Employment records (including job titles, work history, working hours, training records and professional memberships, periods of leave taken and the reasons for the leave).
- Compensation history.
- Performance information.
- Disciplinary and grievance information.

- CCTV footage and other information obtained through electronic means such as swipecard records.
- Information about your use of our information and communications systems.
- Photographs.

We may also collect, store and use the following “special categories” of more sensitive personal information:

- Information about your nationality and entitlement to work in the UK.

4. HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We collect personal information about employees, workers and contractors through the application, recruitment and engagement process, either directly from candidates (including from documents provided or completed by you, from correspondence with you, and through interviews and meetings with you) or sometimes from an employment or recruitment agency, background check provider and references. We may sometimes collect additional information from third parties including former employers and credit reference agencies, in very specific cases.

We will collect additional personal information in the course of job-related activities throughout the period of you working for us. The Company seeks information from third parties with your consent only.

5. HOW WE WILL USE INFORMATION ABOUT YOU

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

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

1. Where we need to protect your interests (or someone else’s interests).
2. Where it is needed in the public interest or for official purposes.

6. SITUATIONS IN WHICH WE WILL USE YOUR INFORMATION

We need all the categories of information in the list above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

- Making a decision about your recruitment or appointment.
- Determining the terms on which you work for us.
- Checking you are legally entitled to work in the UK.
- Paying you and, if you are an employee, deducting tax and National Insurance contributions.
- Liaising with your pension provider.
- Administering the contract we have entered into with you.
- Business management and planning, including accounting and auditing.
- Conducting performance reviews, managing performance and determining performance requirements and operating and keeping a record of such processes.
- Making decisions about salary reviews and compensation.
- Assessing qualifications for a particular job or task, including decisions about promotions.
- Gathering evidence for possible grievance or disciplinary hearings and operating and keeping a record of such processes.
- Making decisions about your continued employment or engagement.
- Making arrangements for the termination of our working relationship.
- Providing references on request.
- Education, training and development requirements.
- Dealing with legal disputes involving you, or other employees, workers or contractors, including accidents at work.
- Obtaining occupation health advice.
- Ascertaining your fitness to work.

- Managing sickness absence and operating and keeping a record of absence management procedures.
- Managing and keeping a record of other types of leave.
- Complying with health and safety obligations.
- To prevent fraud.
- To monitor your use of our information and communication systems to ensure compliance with our IT policies. Further information on our monitoring processes can be found in the Information and Communications Policy and the Social Media/Networking Guidelines.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- To conduct data analytics studies to review and better understand employee retention and attrition rates.

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

7. HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION

“Special categories” of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations or exercise rights in connection with employment.
3. Where it is needed in the public interest, such as for equal opportunities monitoring.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else’s interests) and you are not capable of giving your consent, or where you have already made the information public. We may also process such information about members or former members in the course of legitimate business activities with the appropriate safeguards.

8. OUR OBLIGATIONS AS AN EMPLOYER

We will use your particularly sensitive personal information 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.

9. INFORMATION ABOUT CRIMINAL COVITIONS

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our Data Protection Policy.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We may also process such information about staff or former staff in the course of legitimate business activities with the appropriate safeguards.

We do not envisage that we will hold information about criminal convictions.

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of you working for us. We will use information about criminal convictions and offences solely as part of any safeguarding and/or legally required verifications.

We are allowed to use your personal information in this way to carry out our legal obligations. We have in place an appropriate policy and safeguards which we are required by law to maintain when processing such data.

10. DO WE NEED YOUR CONSENT?

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

11. IF YOU FAIL TO PROVIDE PERSONAL INFORMATION

If you fail to provide certain information when requested, we may not be able to enter into a contract with you, or 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 workers or supporting an employee in exercising their statutory rights).

12. 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 we will explain the legal basis which allows us to do so.

Please note that 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.

13. AUTOMATED DECISION-MAKING

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

1. Where we have notified you of the decision and given you 21 days to request a reconsideration.
2. Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.
3. In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making however we will notify you in writing if this position changes.

14. DATA SHARING

We may have to share your data with third parties, including third-party service providers.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the European Economic Area (“EEA”) – essentially to our subsidiary for HR & Finance operations purpose.

If we do, you can expect a similar degree of protection in respect of your personal information.

Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

Third-party service providers includes contractors and designated agents. The following activities are carried out by third-party service providers: payroll, pension administration, benefits provision and administration, health insurance, life insurance, IT services.

How secure is my information with third-party service providers?

All our 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 our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

What about other third parties?

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

Transferring information outside the EEA

We will transfer the personal information we collect about you to our subsidiary in India outside the EEA for the reasons specified above. There is not an adequacy decision by the European Commission in respect of that country. To ensure that your personal information receives an adequate level of protection data is transferred on the basis of model clauses approved by the European Commission.

15. DATA SECURITY

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures 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 employees, 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.

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

16. DATA RETENTION

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are available in our Data Retention Policy. 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 we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee, worker or contractor of the company we will retain and securely destroy your personal information in accordance with our Data Retention Policy.

17. RIGHTS OF ACCESS, CORRECTION, ERASURE AND RESTRICTION

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with 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.
- **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.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact Naveen Agarwal in writing.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

18. RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact Naveen Agarwal. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

19. DATA PROTECTION OFFICER

We have appointed Naveen Agarwal as the data protection officer to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact Naveen Agarwal. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

20. CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact Naveen Agarwal, CTO.