

# Privacy Statement

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## SFG Aluminium Ltd - ChronoShift Pro Payroll System

**Effective Date:** 12th September 2025

**Last Updated:** 12th September 2025

## 1. Introduction

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SFG Aluminium Ltd ("Company", "we", "us", or "our") is committed to protecting and respecting your privacy. This Privacy Statement explains how we collect, use, disclose, and safeguard your personal information when you use the ChronoShift Pro payroll management system ("Service").

This statement should be read alongside our Terms of Service and any other privacy notices we may provide on specific occasions when collecting or processing personal data.

## 2. Data Controller

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### SFG Aluminium Ltd

Company Registration: [Company Number]

Registered Office: [Registered Address]

ICO Registration: [ICO Number]

Contact: warren@sfg-aluminium.co.uk

## 3. Information We Collect

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### 3.1 Personal Data

We collect and process the following categories of personal data:

#### Identity Information:

- Full name
- Employee number
- Date of birth
- National Insurance number
- Gender
- Emergency contact details

#### Contact Information:

- Home address
- Email address
- Telephone numbers

#### Employment Information:

- Job title and department
- Start date and employment status
- Salary and hourly rates
- Holiday entitlement
- Sickness records

**Time and Attendance Data:**

- Clock-in and clock-out times
- Break durations
- Overtime hours
- Location data (if using mobile clock-in)
- IP addresses for system access

**Payroll Information:**

- Gross pay and deductions
- Tax codes and pension contributions
- Bank account details
- P45/P60 information
- Benefits in kind

**Technical Information:**

- Device information
- Browser type and version
- Operating system
- Login timestamps
- System usage patterns

## **3.2 Special Category Data**

We may process special category personal data where necessary:

- Health information (for sick pay calculations)
- Trade union membership (for deductions)

## **4. Lawful Basis for Processing**

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We process personal data under the following lawful bases as defined in the UK GDPR:

### **4.1 Employment Contract (Article 6(1)(b))**

- Processing payroll and benefits
- Managing working time and attendance
- Performance management
- Health and safety obligations

### **4.2 Legal Obligation (Article 6(1)(c))**

- HMRC reporting requirements
- Statutory sick pay calculations
- Pension auto-enrolment
- Working time directive compliance

### **4.3 Legitimate Interests (Article 6(1)(f))**

- System security and fraud prevention
- Business administration and record keeping
- Improving service efficiency

### **4.4 Special Category Data**

Where we process special category data, we rely on:

- Employment law necessity (Article 9(2)(b))

- Substantial public interest (Article 9(2)(g))
- Explicit consent where required (Article 9(2)(a))

## 5. How We Use Your Information

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### 5.1 Primary Purposes

- Calculate and process payroll payments
- Maintain accurate employment records
- Monitor working time and attendance
- Comply with statutory reporting obligations
- Administer employee benefits and pensions

### 5.2 Secondary Purposes

- Generate management reports and analytics
- Improve system functionality and user experience
- Ensure system security and prevent fraud
- Respond to employee enquiries and support requests

## 6. Information Sharing and Recipients

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### 6.1 Internal Recipients

Personal data may be accessed by:

- Payroll administrators
- HR personnel
- Line managers (limited to their team members)
- IT support staff (for technical issues)
- Senior management (for reporting purposes)

### 6.2 External Recipients

We may share personal data with:

#### **Government Bodies:**

- HM Revenue & Customs (HMRC)
- Department for Work and Pensions (DWP)
- Health and Safety Executive (HSE)

#### **Third-Party Processors:**

- Payroll software providers
- Banking institutions
- Pension scheme administrators
- Occupational health providers

#### **Legal Requirements:**

- Courts and tribunals
- Legal representatives
- Regulatory authorities

## 6.3 International Transfers

We do not routinely transfer personal data outside the UK. Where necessary, transfers will comply with UK GDPR requirements and appropriate safeguards will be implemented.

## 7. Data Retention

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We retain personal data for the following periods:

### 7.1 Active Employment

- Current employee records: Duration of employment plus retention period
- Payroll records: Current tax year plus 3 years (HMRC requirement)
- Time and attendance: 2 years

### 7.2 Post-Employment

- Employment records: 6 years after termination
- Payroll records: 3 years after termination
- Accident records: 3 years or until age 21 (whichever is longer)
- Pension records: 6 years after benefits cease

### 7.3 Legal Requirements

Certain records may be retained longer where required by law or for potential legal proceedings.

## 8. Data Security

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### 8.1 Technical Measures

- Encryption of data in transit and at rest
- Multi-factor authentication
- Regular security updates and patches
- Access controls and user permissions
- Secure backup and recovery procedures

### 8.2 Organisational Measures

- Staff training on data protection
- Regular security audits and assessments
- Incident response procedures
- Data protection impact assessments
- Privacy by design principles

### 8.3 Access Controls

- Role-based access permissions
- Regular access reviews
- Secure password policies
- Audit trails for all system access

## 9. Your Rights

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Under the UK GDPR, you have the following rights:

## **9.1 Right of Access (Article 15)**

You can request a copy of your personal data we hold.

## **9.2 Right to Rectification (Article 16)**

You can request correction of inaccurate or incomplete data.

## **9.3 Right to Erasure (Article 17)**

You can request deletion of your data in certain circumstances.

## **9.4 Right to Restrict Processing (Article 18)**

You can request we limit how we use your data.

## **9.5 Right to Data Portability (Article 20)**

You can request your data in a portable format.

## **9.6 Right to Object (Article 21)**

You can object to processing based on legitimate interests.

## **9.7 Rights Related to Automated Decision Making (Article 22)**

We will inform you of any automated decision making that affects you.

## **9.8 Exercising Your Rights**

To exercise any of these rights, contact warren@sfg-aluminium.co.uk. We will respond within one month of receiving your request.

# **10. Cookies and Tracking**

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## **10.1 Essential Cookies**

We use strictly necessary cookies to:

- Maintain user sessions
- Ensure system security
- Remember user preferences

## **10.2 Analytics**

We may use analytics to understand system usage and improve performance. This data is anonymised where possible.

## **10.3 Cookie Management**

You can control cookies through your browser settings, though this may affect system functionality.

# **11. Data Breach Response**

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In the event of a personal data breach:

- We will assess the risk to individuals
- High-risk breaches will be reported to the ICO within 72 hours
- Affected individuals will be notified without undue delay
- We will take immediate action to contain and remedy the breach

## 12. Children's Privacy

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ChronoShift Pro is not intended for use by anyone under 16 years of age. We do not knowingly collect personal data from children under 16.

## 13. Third-Party Links

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Our Service may contain links to third-party websites. We are not responsible for their privacy practices and encourage you to read their privacy policies.

## 14. Changes to This Privacy Statement

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We may update this Privacy Statement from time to time. Material changes will be communicated through:

- Email notification
- System announcements
- Website updates

Continued use of the Service constitutes acceptance of any changes.

## 15. Contact Information

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### 15.1 Data Protection Queries

For questions about this Privacy Statement or our data practices:

#### **Data Protection Officer**

SFG Aluminium Ltd

Email: warren@sfg-aluminium.co.uk

Phone: [Company Phone Number]

Address: [Company Address]

### 15.2 Regulatory Authority

If you are not satisfied with our response to your data protection concerns, you can contact:

#### **Information Commissioner's Office (ICO)**

Wycliffe House

Water Lane

Wilmslow

Cheshire SK9 5AF

Tel: 0303 123 1113

Website: [www.ico.org.uk](http://www.ico.org.uk)

## 16. Complaints Procedure

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### 16.1 Internal Process

1. Contact your line manager or HR department
2. If unresolved, escalate to the Data Protection Officer
3. We aim to resolve complaints within 30 days

## **16.2 External Options**

You have the right to lodge a complaint with the ICO at any time.

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This Privacy Statement was last updated on 12th September 2025. Please review regularly as we may update this document to reflect changes in our practices or applicable law.