**3.22 Data Protection & Employees**

Employees ' and other Staff personal data falls within the scope of the GDPR in the same way as customers' personal data, and therefore all aspects of this Policy apply to ICICI Bank's employees.

HR should maintain employee data files and managers should not keep any information on employees other than that which relates to current live issues (e.g. disciplinary/poor performance/performance appraisal documents). All staff, especially line managers, should bear in mind that facts or opinions relating to employees contained in emails, electronic documents, spreadsheets, meeting and interview notes etc and any structured manual Data may need to be provided in response to a subject access request.

**The staff privacy notice should be shared with all employees. Refer employee handbook for details.**

**Staff Training**

All staff involved in processing of Personal Data should receive data protection training. As a minimum, staff members who have been mandated and therefore outside of the e learning exemption list must complete their Data Protection e-learning annually. The e learning exceptions list is approved by the Head of Compliance or the DPO each year.