

PRIVACY NOTICE FOR EMPLOYEES CKD GALBRAITH LLP trading as GALBRAITH

Galbraith is committed to protecting your privacy and the confidentiality of your personal information. This privacy notice explains how we collect, use and protect your personal information. In this privacy notice, "our" and "we" means CKD Galbraith LLP trading as Galbraith. Any reference to "you" or "your" refers to any employee whose personal information we collect and process.

1. Introduction

Our use of your personal information is governed by this privacy notice. Galbraith is a controller for the personal information that it collects and uses about you. We will treat your personal information as confidential and in accordance with applicable data protection legislation, and your personal information will only be shared with others in accordance with this privacy notice. In this privacy notice we explain:

- What personal information is and how it will be used;
- The types of personal information we collect, who we share it with, the basis for processing and the retention period;
- How we keep your personal information secure;
- Your rights in relation to your personal information; and
- How to make complaints and how to contact us.

2. What is personal information and how it will be used?

Personal information is any information that tells us something about you. This includes information such as name, contact details, date of birth, bank account details or any information about your needs or circumstances which would allow us to identify you. Some personal information is classified as special data under data protection legislation. This includes information relating to health, racial or ethnic origin, religious beliefs or political opinions and sexual orientation. This information is more sensitive and we need to have further justification for collecting, storing and using this type of personal information. There are also additional restrictions on the circumstances in which we are permitted to collect and use criminal conviction data. Any references to personal information in this privacy notice includes personal data, and where relevant, special categories of personal data. How we use your personal information is detailed within the table below.

3. What we collect, who it is shared with, the basis for processing and retention period

The table below provides details of the personal information we collect, who we share it with, the legal basis on which it is held and how long we hold it for.

Type of information	Who it is shared with	Legal basis for processing this information and how your personal information is used	Retention period for keeping this information
Personal details (name and address, email address, phone number, date of birth, qualifications, employment history, salary, benefits package, terms of employment, information of any disabilities)	Internally shared with: <ul style="list-style-type: none"> - Appropriate senior management and line managers Externally shared with: <ul style="list-style-type: none"> - our HR/Payroll system provider - our training providers - Name Badges/ Company notice boards/Company intranet & website Qualifications: <ul style="list-style-type: none"> - Where required by current/potential clients and by any appropriate third parties. Employment History: <ul style="list-style-type: none"> - References are sought from referees provided on commencement of employment and basic references are provided upon request to future employers Name and address: <ul style="list-style-type: none"> - Third party suppliers Name: <ul style="list-style-type: none"> - Clients 	Legitimate Interest: <ul style="list-style-type: none"> - to ensure that all relevant employment details are known to senior management within the business - to ensure management of employee data - to ensure that the correct people within the business are identified to clients and appropriate third parties. Compliance with our governing body RICS - to ensure that appropriate training / qualifications are provided or undertaken - references are obtained as part of our recruitment process and references are provided upon request to facilitate the recruitment processes of further employers - provision of corporate gifts and incentives 	At least 6 years after the termination of employment.
Copies of Passport/Driving Licence/birth certificate and eligibility to work documentation and proof of address documentation	Internally shared with: <ul style="list-style-type: none"> - Appropriate senior management Externally shared with: <ul style="list-style-type: none"> - Experian, hire car companies - Externally shared with our HR system provider 	Legal Obligation: <ul style="list-style-type: none"> - to ensure we meet our legal obligations Legitimate Interest <ul style="list-style-type: none"> - Criminal and credit checks are carried out as part of our recruitment process and upon request to facilitate the recruitment 	At least 6 years after the termination of employment

Type of information	Who it is shared with	Legal basis for processing this information and how your personal information is used	Retention period for keeping this information
		processes of further employers - to ensure management of employee data	
Next of kin details (name, address, phone number, relationship to you)	Internally shared with: - Appropriate senior management Externally shared with: - External benefits provider and broker - Externally shared with our HR system provider	Legitimate interest: - to ensure that the correct people within the business can make contact with your next of kin in the case of an emergency Legal Obligation: - to ensure that we are able to facilitate the benefit Legitimate Interest - to ensure management of employee data	At least 6 years after the termination of employment
Salary details, bank account details	Externally shared with: - HMRC, Firm's bank, payroll system provider Internally shared with: - Appropriate senior management	Legal obligation: - to ensure that all employees are paid salary /wages	At least 3 years after the end of the tax year or pay reference period they relate to, whichever is the later
Pension details (pension provider, levels of contribution, pension plan details e.g. plan reference number)	Externally shared with: - Scottish Widows, HMRC, payroll system provider Internally shared with: - HR Manager and Head of Finance	Legal obligation: - to ensure that we meet our obligations to provide employees with a pension	At least 6 years after the termination of employment
HR information (details of any aspect of your recruitment or employment, including its termination) for which we require to take professional advice including personal details above where required	Internally shared with: - Appropriate management Externally shared with: - ACAS, Firm's employment law advisors and our HR system provider	Legitimate interest: - to ensure that we take advice regarding our employees which complies with HR best practice and UK employment law and to ensure management of employee data	At least 6 years after the termination of employment
Payroll records	Externally shared with:	Legal obligation:	At least 3 years after the end of the tax

Type of information	Who it is shared with	Legal basis for processing this information and how your personal information is used	Retention period for keeping this information
Including: Statutory maternity, adoption and paternity pay, sick pay and National Minimum Wage records	<ul style="list-style-type: none"> - HMRC, Firm's bank and our HR system provider Internally shared with: <ul style="list-style-type: none"> - Appropriate senior management 	<ul style="list-style-type: none"> - to ensure that we provide all statutory information to HMRC in order to provide evidence that we are complying with our legal obligations Legitimate Interest: <ul style="list-style-type: none"> - to ensure management of employee data 	year or pay reference period they relate to, whichever is the later after the termination of employment
Special Category Data including: details of absence or leave taken, the reasons for absences, the type of leave, information about medical or health conditions, reasonable adjustments, records of absence management discussions, correspondence with employees and written warnings, details of ethnic origin, equal opportunities monitoring details	Externally shared with: <ul style="list-style-type: none"> - Benefits providers, brokers, medical professionals, fit for work service, occupational health and our HR system provider Internally shared with: <ul style="list-style-type: none"> - Appropriate senior management 	Consent: <ul style="list-style-type: none"> - Special category data is collected from candidates for the purpose of equal opportunities monitoring based on consent. Legitimate interest: <ul style="list-style-type: none"> - To maintain a record of the operation of absence procedures - To ensure that employees receive statutory and contractual sick pay or other pay entitlements (such as maternity or other family-related pay) and benefits - To meet health and safety obligations - To comply with the requirement to make reasonable adjustments - For HR and business administration purposes - For defence against potential legal claims - To ensure management of employee data Legal obligation: <ul style="list-style-type: none"> - Necessary for the performance of a contract or to enter into a contract - Necessary for compliance with a legal obligation - Necessary for the legitimate interests of the organisation - Necessary to carry out obligations or exercise 	At least 6 years after the termination of employment

Type of information	Who it is shared with	Legal basis for processing this information and how your personal information is used	Retention period for keeping this information
		rights under employment law	

4. How we keep your information secure

The security of information is very important to us and we have measures in place which are designed to prevent unauthorised access to your personal information including but not limited to:

- Our employee files are stored on an external HR and Payroll system. Access to this system is restricted to those within the business who are required to have access to your information for legitimate business purposes. You will be given secure access to the system to check your own data.
- Our contract with our HR and Payroll system provider contains provisions relating to the secure storage and processing of personal data.
- We ensure that access to personal information by Galbraith employees and workers or other persons working within Galbraith is on a need to know basis.

Personal information held by our external HR and Payroll system provider is stored in locations within the UK and the European Economic Area (EEA). Whilst we make every effort to ensure that personal data is not transferred out with the EEA by clients and suppliers this is not always possible to achieve. When we are made aware that a client or supplier stores or processes personal data out with the EEA then we will ensure that our agreement with them contains compliant contractual clauses.

5. Your rights in relation to your personal information

You have a number of rights in relation to your personal information, these include the right to:

- Be informed about how we use your personal information
- Obtain access to your personal information that we hold
- Request that your personal information is corrected if you believe it is incorrect, incomplete or inaccurate
- Request that we erase your personal information in the following circumstances:
 - If Galbraith is continuing to process personal information beyond the period when it is necessary to do so for the purpose for which it was originally collected
 - If Galbraith is relying on consent as the legal basis for processing and you withdraw consent

- If Galbraith is relying on legitimate interests as the legal basis for processing and you object to this processing and there is no overriding compelling ground which enables us to continue with the processing
- If the personal information has been processed unlawfully (i.e. in breach of the requirements of the data protection legislation)
- If it is necessary to delete the personal information to comply with a legal obligation
- Ask us to restrict our data processing activities where you consider that:
 - personal information is inaccurate
 - our processing of your personal information is unlawful
 - where we no longer need the personal information but you require us to keep it to enable you to establish, exercise or defend a legal claim
 - where you have raised an objection to our use of your personal information
- Request a copy of certain personal information that you have provided to us in a commonly used electronic format. This right relates to personal information that you have provided to us that we need in order to perform our agreement with you and personal information where we are relying on consent to process your personal information
- Object to our processing of your personal information where we are relying on legitimate interests or exercise of a public interest task to make the processing lawful. If you raise an objection we will carry out an assessment to determine whether we have an overriding legitimate ground which entitles us to continue to process your personal information; and
- Not be subject to wholly automated decisions which produce legal effects or which could have a similarly significant effect on you.

If you would like to exercise any of your rights please contact martin.cassels@galbraithgroup.com.

6. Complaints and Contact Details

If you have any complaints about the way we use your personal information please contact martin.cassels@galbraithgroup.com. If we cannot resolve any issue you have the right to complain to the data protection authority in your country (the Information Commissioner in the UK).

If you have any questions, comments or requests regarding any aspect of this Privacy Policy, please do not hesitate to contact us by sending an email to martin.cassels@galbraithgroup.com

Your declaration

I confirm that I have read and understood the above information relating to how my personal information will be processed and shared.

Name	
Job title	
Date	