

## **PERSIMMON PLC**

### **PRIVACY POLICY – EMPLOYMENT RELATIONSHIP**

**Data controller: Persimmon Plc (which for the purposes of this note includes all companies in the Persimmon Group including but not limited to Persimmon Homes Limited, Charles Church Developments Limited and Space 4 Limited) (“we” or “the Company”) all of Persimmon House, Fulford, York, YO19 4FE**

We collect and process personal data relating to our employees to manage the employment relationship. We are committed to being transparent about how we collect and use that data and meeting our data protection obligations. We are registered as a Data Controller with the Information Commissioners Office.

While we make all efforts to ensure that employees are accurately informed of the ways in which we process your personal data, we also reserve the right to amend this notice from time to time to reflect changed circumstances or to take into account new legal or regulatory requirements.

#### **What information does the organisation collect?**

The Company collects and processes a range of information about you. This may include:

- your name, address and contact details, including email address and telephone number, date of birth and gender;
- the terms and conditions of your employment;
- details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with us;
- information about your remuneration, including entitlement to benefits such as pensions or insurance cover;
- details of your bank account, national insurance number and tax code;
- information about your marital status, next of kin, dependants and emergency contacts;
- information about your nationality and entitlement to work in the UK;
- details of your schedule (days of work and working hours) and attendance at work;
- details of periods of leave taken by you, including holiday, sickness absence, statutory and family leave and sabbaticals, and the reasons for the leave;
- details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence;
- assessments of your performance, including appraisals, performance reviews, mystery shopping and ratings, training you have participated in, performance improvement plans and related correspondence;
- information about medical or health conditions, including whether or not you have a disability for which the organisation needs to make reasonable adjustments;
- information about your driving licence, driving history and car insurance;

- equal opportunities monitoring information, including information about your ethnic origin and any disability;
- CCTV images; and
- contact details for your next of kin and/or the person we can contact in the event of an emergency which you provide to us for this purpose with their consent

The Company collects this information in a variety of ways. For example, data is collected from CVs or resumes; obtained from your passport or other identity documents such as your driving licence; from forms completed by you at the start of or during employment (such as benefit nomination forms); from correspondence with you; or through interviews, meetings or other assessments.

We may use CCTV recording on some of our premises, including site offices, for the purposes of security, crime prevention, health and safety, training and performance monitoring. Wherever CCTV is in operation you will be notified of this via appropriate signage. We retain the images recorded only for so long as is necessary and will normally delete them after 12 calendar months unless there is a specific requirement to retain them. The images are recorded for our internal use and will not be shared with any third parties except where required, for example for the purposes of the prevention or detection of crime

Data is stored in a range of different places, including in your regional office file, your central personnel file, payroll files, in the organisation's HR and Payroll management systems and in other IT systems (including the Company's email system).

### **Does the organisation collect information from 3<sup>rd</sup> parties?**

The Company collects personal data about you from third parties, such as references supplied by former employers or information supplied by HMRC. For certain roles some of this information may be collected by agencies undertaking pre-employment screening on our behalf. If such screening is undertaken for your role, you will be required to give certain information to the agency responsible for carrying it out, at which point they will inform you of your full rights and how they will handle that data at the time you are asked to provide it.

Where prospective customers have initiated contact with the Company through a platform operated by a third party, the Company has access to and may obtain copies of recordings of your telephone communications with such customers. We will only obtain and review such recordings in order to monitor the quality of service provided to prospective customers and to ensure that enquiries receive the appropriate response.

If you are employed in a customer facing role, for example as a Sales Advisor, in limited cases the Company may use an external third party service provider specifically to gather, edit and provide us with information related to your performance to assist with your training and development. This includes mystery shopping and may involve the covert recording of your behaviour and interactions with individuals posing as customers. Where this type of activity is conducted, we may process images and footage (including audio) of you that are captured by visual recording devices, including CCTV and in some circumstances covert recording equipment.

In the limited circumstances that we process information captured by covert monitoring, we ensure that processing is appropriately limited in both time and scope, we also ensure that the processing of your data is specifically limited to the purpose of collection and that access to the data we receive is restricted to designated individuals, in any case being your line managers and/or your Regional Training Manager. Furthermore, before arranging for any covert monitoring to occur, we will ensure that contractual provisions are in place with the service provider to protect the security of your information and to appropriately limit their usage of any footage taken. You will be informed if this activity is planned, but you will not be told when it will take place.

Any data provided to us for monitoring purposes will be stored for a maximum of 6 months and will only be retained by the Company for a longer period where we have a legitimate purpose and lawful basis to do so.

### **Why does the organisation process personal data?**

The Company needs to process data to enter into an employment contract with you and to meet its obligations under your employment contract. For example, it needs to process your data to provide you with an employment contract, to pay you in accordance with that contract and to administer benefits, pension and insurance entitlements. The Company may also need to process your data in order to assist with your personal development and training, including by monitoring your performance where this is related to that training.

In some cases, the Company needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check an employee's entitlement to work in the UK, to deduct tax, to comply with health and safety laws and to enable employees to take periods of leave to which they are entitled.

In other cases, the Company has a legitimate interest in processing personal data before, during and after the end of the employment relationship.

Processing employee data on the legal bases outlined above allows the Company to:

- run recruitment and promotion processes;
- maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency), and records of employee contractual and statutory rights;
- operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace;
- encourage appropriate employee conduct through proportionate supervision and monitoring;
- provide appropriate training, guidance and personal development
- operate and keep a record of employee performance and related processes, to plan for career development, and for succession planning and workforce management purposes;

- operate and keep a record of internal and external training completed by employees to ensure health and safety requirements are met and employees have the skills to effectively carry out their work
- operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled or which the Company offers;
- obtain occupational health advice, to ensure that it complies with duties in relation to individuals with disabilities, meet its obligations under health and safety law, and ensure that employees are receiving the pay or other benefits to which they are entitled;
- operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to allow effective workforce management, to ensure that the Company complies with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled;
- operate a safe and effective working environment;
- operate a safe and effective company car/car allowance scheme
- ensure effective general HR and business administration;
- provide references on request for current or former employees;
- respond to and defend against legal claims; and
- maintain and promote equality and diversity in the workplace.

Where the Company relies on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of employees or workers and has concluded that they are not.

### **Special Category Personal Data**

We may collect "special categories" of particularly sensitive personal information about you. This type of information requires higher levels of protection. It could include information about your ethnicity, religion, physical or mental health or trade union membership. We may collect this information where you disclose it to us voluntarily or where we collect it as part of your employment. We may process this information to carry out our obligations under employment, social security and social law (such as those in relation to employees with disabilities or law which is applicable as a result of your employment, such as our obligations under Health and Safety and Equality). We may also process this information where you have provided your consent by volunteering this information to us. You have a right to withdraw your consent but this will not affect any processing which has already occurred.

### **Who has access to data?**

Unless otherwise stated, your information will be shared internally on a general basis, including with members of the HR and Training departments, the payroll department, head office and regional finance personnel, your direct line manager and other managers and secretarial staff in the business in which you work, and other staff if access to the data is necessary for performance of their roles.

The Company shares your relevant data with third parties in order to obtain pre-employment references from other employers. The Company will also share your data with third parties for the purposes of mortgage and property references only with your specific consent. The Company will also supply limited information in response to requests for employment references.

The Company also shares your data with third parties that process data on its behalf in connection with payroll, the provision of benefits, the provision of occupational health services, the provision of training and apprenticeships, the provision of car and other insurance policies and the defence of any legal claims.

If we instruct an external 3<sup>rd</sup> party service provider for the purpose of performing employee monitoring, we will need to share certain categories of data with that service provider. However, this will be limited to your name, position, location of employment and your ordinary scheduled working hours or shift patterns. We will never share “special category” data with them and, pursuant to the contractual terms we have in place, they are prohibited from sharing any of your data with other parties.

The Company will not transfer your data to countries outside the European Economic Area.

### **How does the Company protect data?**

The Company takes the security of your data seriously. The Company has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties. These include measures such as the Group Policy, the encryption and/or password protection of relevant data storage and transmissions and the Persimmon Cloud.

Where the Company engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and Company measures to ensure the security of data.

### **For how long does the Company keep data?**

Unless otherwise stated in this Notice, the Company will hold your personal data for the duration of your employment. The periods for which your data is held after the end of employment vary for the type of data concerned. The Company’s Group Policy sets out these time periods.

### **Your rights**

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the Company to change incorrect or incomplete data;
- require the Company to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;

- object to the processing of your data where the Company is relying on its legitimate interests as the legal ground for processing; and
- ask the Company to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the Company's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact The Company Secretarial Department, Persimmon Plc, Persimmon House, Fulford, York, YO19 4FE.

If you believe that the Company has not complied with your data protection rights, you can complain to the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF, telephone 0303 123 1113. [www.ico.org.uk](http://www.ico.org.uk).

### **What if you do not provide personal data?**

You have some obligations under your employment contract to provide the Company with data. In particular, you are required to report absences from work (and the reasons for those absences) and may be required to provide information about disciplinary or other matters under the implied duty of good faith. You may also have to provide the Company with data in order to exercise your statutory rights, such as in relation to statutory leave entitlements. Failing to provide the data may mean that you are unable to exercise your statutory rights.

Certain information, such as contact details, your right to work in the UK and payment details, have to be provided to enable the Company to enter a contract of employment with you. If you do not provide other information, this will hinder the Company's ability to administer the rights and obligations arising as a result of the employment relationship efficiently.

October 2019