

# Employee Privacy Policy

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## Introduction

We are committed to protecting the privacy and security of your personal data. This policy explains how we collect and use your personal data when you work for us. It will list the rights you have whilst we use your data.

This policy applies to all employees. It is not part of any contract of employment. We may vary, amend, alter, or replace this notice at any time.

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## Who We Are

Depending on where you work, Persimmon PLC, Persimmon Homes Limited, Charles Church Developments Limited, and Space4 Limited “we”, “us” are the data controller of your personal data. This means that they decide how your personal data is held and used.

Our registered address is:

**Persimmon House**  
**Fulford**  
**York**  
**YO19 4FE**

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## Data Protection Details

You can contact our data protection team at [this email address](#). Alternatively, you can contact them by post at the above registered address, marking the envelope FAO: Data Protection.

If you have any questions about this policy, or how we handle your personal data, please contact the data protection team.

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## Types of Data We Collect

Personal data is any information that identifies someone, or information about someone who is already identified. There are also “special categories” of more sensitive personal data which require a higher level of protection.

The categories of data we process when you work for us may include, and are not limited to:

**Identity Data** – Your name, title, and job title.

**Identity Number Data** – National Insurance number, driving license number, and date of birth.

**Contact Data** - Your postal address, email address, and phone number.

**Pay and Benefits Data** –Your bank details, start date, tax code, remuneration (including benefits like pensions or insurance cover), taxes and National Insurance paid, participation in “Save As You Earn” (SAYE) or other benefits.

**Training and Qualification Data** – Details of your qualifications, skills, experience, employment history (with previous employers and us), driving licence (including penalties), driving history, car insurance, and completed training courses.

**Referencing Data** – Your nationality, right to work in the United Kingdom, scans of identity documents, national insurance number, reference checks, background checks including social media posts, and screening results.

**Performance Data** – The terms and conditions of your employment, performance assessments (including appraisals, reports, reviews, mystery shopping, and ratings), call recordings (where applicable), performance improvement plans, details of any disciplinary or grievance procedures (including warnings), and related correspondence.

**Attendance Data** – Details of your schedule (workdays and hours), attendance, periods of leave (holiday, sickness, statutory, family leave, and sabbaticals), IT system usage, vehicle usage, and building access records, including electronic swipe card logs.

**Inclusivity Data** – Details of your age, marital status, sex, gender and details relating to social mobility.

**Dependent and Nominee Data** – Contact details for your next of kin, nominated beneficiaries, emergency contacts, nominated references, and nominated second drivers.

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## **Special Category Data**

We may process the following special category data about you:

**Health Data** – Reasons for statutory leave, information about medical or health conditions or treatments (including any requiring reasonable adjustments), pregnancy or maternity/paternity data, details of any workplace accidents, and the results of any drug and alcohol testing.

**Sensitive Inclusivity Data** – Information about your race or ethnicity, religious beliefs, and sexual orientation.

**Trade Union Membership Data** – Information relating to your membership of a Trade Union

**CCTV Monitoring Data** – CCTV images that may identify you.

**Biometric Monitoring Data** – Where biometric sign-in is used for site access.

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## The Reasons We Process Your Data

The types of data we collect can vary based on how you work with us. Below are tables that outline the reasons and legal basis we use to process your data.

### Recruitment and Employment

Reason	Types of Data	Legal Basis
Assessing if you're right for the job	Identity Data Contact Data Dependent and Nominee Data Training and Qualification Data	<ul style="list-style-type: none"> <li>• <b>Contractual Obligation</b></li> <li>• <b>Legitimate Interest</b> – Communicating with potential employees.</li> </ul>
Checking your right to work in the UK	Identity Data Identity Number Data Contact Data Referencing Data	<ul style="list-style-type: none"> <li>• <b>Legal Obligation</b></li> <li>• <b>Contractual Obligation</b></li> </ul>
Paying you and handling tax and National Insurance	Identity Data Identity Number Data Contact Data Pay and Benefits Data Attendance Data Dependent and Nominee Data	<ul style="list-style-type: none"> <li>• <b>Legal Obligation</b></li> <li>• <b>Contractual Obligation</b></li> </ul>
Giving you access to benefits	Identity Data Identity Number Data Contact Data Attendance Data Pay and Benefits Data Dependent and Nominee Data	<ul style="list-style-type: none"> <li>• <b>Contractual Obligation</b></li> <li>• <b>Legitimate Interest</b> - to attract, retain, and develop the best people by offering competitive benefits. Aligning employee and company interests.</li> </ul>
Deciding on your pay and other benefits	Identity Data Performance Data Attendance Data	<ul style="list-style-type: none"> <li>• <b>Contractual Obligation</b></li> <li>• <b>Legal Obligation</b></li> <li>• <b>Legitimate Interest</b> - to attract, keep, and develop the best people with the right skills.</li> </ul>
Booking work travel and transport	Identity Data Contact Data Attendance Data	<ul style="list-style-type: none"> <li>• <b>Contractual Obligation</b></li> <li>• <b>Legitimate Interests</b> - organise travel between sites when necessary.</li> </ul>

## Leave, Sickness, and Health

Reason	Types of Data	Legal Bases
Managing leave like maternity, paternity, and sickness	Identity Data Contact Data Performance Data Attendance Data Health Data	<ul style="list-style-type: none"> <li>• <b>Legal Obligation</b></li> <li>• <b>Contractual Obligation</b></li> <li>• <b>Legitimate Interests</b> – Facilitate discretionary or additional annual leave.</li> </ul>
Getting advice on your fitness for work	Identity Data Identity Number Data Contact Data Health Data	<ul style="list-style-type: none"> <li>• <b>Legal Obligation</b></li> <li>• <b>Contractual Obligation</b></li> </ul>
Making adjustments if you have a disability	Identity Data Contact Data Health Data	<ul style="list-style-type: none"> <li>• <b>Legal Obligation</b></li> <li>• <b>Legitimate Interest</b> - to attract, keep, and develop the best people with the right skills.</li> </ul>
Keeping our sites and offices safe and meeting health and safety rules	Identity Data Contact Data Attendance Data Health Data	<ul style="list-style-type: none"> <li>• <b>Legal Obligation</b></li> <li>• <b>Contractual Obligation</b></li> <li>• <b>Legitimate Interest</b> - ensuring the safety and security of our sites.</li> </ul>

## Performance and Development

Reason	Types of Data	Legal Basis
Planning training and development	Identity Data Training and Qualification Data	<ul style="list-style-type: none"> <li>• <b>Legal Obligation</b></li> <li>• <b>Contractual Obligation</b></li> <li>• <b>Legitimate Interest</b> – ensuring staff complete mandatory training and supporting development</li> </ul>
Supporting under-performing staff	Identity Data Performance Data Attendance Data	<ul style="list-style-type: none"> <li>• <b>Contractual Obligation</b></li> <li>• <b>Legal Obligation</b></li> <li>• <b>Legitimate Interest</b> – ensuring staff complete mandatory training and supporting development</li> </ul>

Reason	Types of Data	Legal Basis
Boosting employee satisfaction	Identity Data Performance Data	<ul style="list-style-type: none"> <li>• <b>Legitimate Interest</b> - to develop and improve employee engagement programmes.</li> </ul>

## Records and Administration

Reason	Types of Data	Legal Basis
Keeping accurate records and emergency contact details	Identity Data Contact Data Dependent and Nominee Data	<ul style="list-style-type: none"> <li>• <b>Contractual Obligation</b></li> <li>• <b>Legitimate Interest</b> – monitoring and keeping records about our employees.</li> </ul>
Statutory reporting on Gender Pay Gap, CEO Pay Ratio, and similar disclosures	Inclusivity Data Sensitive Inclusivity Data Pay and Benefits Data (for pay ratio reporting)	<ul style="list-style-type: none"> <li>• <b>Legal Obligation</b></li> </ul>
Managing your work schedule	Identity Data Performance Data Attendance Data	<ul style="list-style-type: none"> <li>• <b>Contractual Obligation</b></li> </ul>
Providing access to IT systems and company sites	Identity Data	<ul style="list-style-type: none"> <li>• <b>Contractual Obligation</b></li> <li>• <b>Legitimate Interest</b> - to ensure that access is limited to those who need it</li> </ul>
Delivering IT equipment for remote or site work	Identity Data Contact Data	<ul style="list-style-type: none"> <li>• <b>Contractual Obligation</b></li> <li>• <b>Legitimate Interest</b> - to ensure that access is limited to those who need it.</li> </ul>

## Legal, Security, and Compliance

Reason	Types of Data	Legal Basis
Managing employee wellbeing and standards	Identity Data Performance Data Attendance Data	<ul style="list-style-type: none"> <li>• <b>Legal Obligation</b></li> <li>• <b>Contractual Obligation</b></li> <li>• <b>Legitimate Interest</b> – to manage conduct issues and complaints involving staff.</li> </ul>
Responding to legal claims	Identity Data Performance Data Attendance Data	<ul style="list-style-type: none"> <li>• <b>Legal Obligation</b></li> <li>• <b>Legitimate Interest</b> – the defence of any legal claims made against us.</li> </ul>
Monitoring equality, diversity and inclusion	Identity Data Inclusivity Data Sensitive Inclusivity Data	<ul style="list-style-type: none"> <li>• <b>Legal Obligation</b></li> <li>• <b>Legitimate Interest</b> - to attract, keep, and develop the best people with the right skills.</li> </ul>
Preventing fraud, money-laundering, and bribery, or other illegal acts	Identity Data Attendance Data	<ul style="list-style-type: none"> <li>• <b>Legal Obligation</b></li> <li>• <b>Legitimate Interest</b> - to prevent or detect unlawful acts.</li> </ul>
Protecting IT systems	Identity Data Attendance Data CCTV Monitoring Data	<ul style="list-style-type: none"> <li>• <b>Legitimate Interest</b> - ensuring policies and procedures are followed and the safety and security of our IT systems.</li> </ul>
Supporting business planning and changes	Identity Data Performance Data	<ul style="list-style-type: none"> <li>• <b>Legal Obligation</b></li> <li>• <b>Legitimate Interest</b> - to provide access to our resources.</li> </ul>

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## What Happens if You Don't Provide Data

If you do not provide us with certain data, we may not be able to meet our obligations under your employment contract. For example, without your Pay and Benefits Data, we may not be able to pay you. We may also be unable to comply with legal requirements, such as Health and Safety regulations. As a result, we may not be able to enter into a contract with you if you don't provide certain data.

You also have obligations under your employment contract to provide the Company with data. For example, you must report any absences from work and the reasons for them. You may also need to provide data to exercise your statutory rights, such as for sick pay. If you do not provide this data, you may not be able to exercise these rights.

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## Informing Us of Changes

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

You can update your data using the Access HR system, contacting your HR representative, or by contacting [human.resources@persimmonhomes.com](mailto:human.resources@persimmonhomes.com).

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## Your Rights

Under data protection law, you have the following rights:

- The **right to be informed** about the data we hold and what we do with it
- The **right of access** to the data we hold, including receiving a copy of it
- The **right to correct inaccuracies** in the data we hold
- The **right to be forgotten** allowing you to ask us to delete or erase data in certain circumstances
- The **right to restrict** our processing of your data when you want us to verify it is accurate or our reason for processing it
- The **right to transfer** your data to another party where we hold it based on your consent or for a contract we hold with you. This is also known as 'portability'
- The **right to object** to us processing your data where we use it solely for our legitimate interests
- Rights relating to any **automated decision-making and profiling** of your personal data.

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## Who We Share Your Data With

We will share your data internally with members of our HR, Payroll, and Company Secretarial departments, head office, regional finance personnel, your line manager, and staff in the business you work for, but only when they need it to carry out their responsibilities.

We may share your data with third parties, depending on the type of data. We may also share it to meet any legal obligations we have. When we share your data, we make sure third parties handle it responsibly, follow the law, and prioritise its security.

The following table shows the categories of third parties, what data we share, and why we share it with them:

Third Parties	Categories of Data	Reasons for Sharing
Recruiters	<ul style="list-style-type: none"> <li>Identity Data</li> <li>Contact Data</li> <li>Training and Qualification Data</li> </ul>	<ul style="list-style-type: none"> <li>Assessing if you're right for the job</li> </ul>
Home Office	<ul style="list-style-type: none"> <li>Identity Data</li> <li>Identity Number Data</li> <li>Contact Data</li> <li>Referencing Data</li> </ul>	<ul style="list-style-type: none"> <li>Checking your right to work in the UK</li> </ul>
Disclosure Barring Service	<ul style="list-style-type: none"> <li>Identity Data</li> <li>Identity Number Data</li> <li>Contact Data</li> <li>Referencing Data</li> </ul>	<ul style="list-style-type: none"> <li>Assessing if you're right for the job</li> </ul>
Former Employers	<ul style="list-style-type: none"> <li>Identity Data</li> <li>Dependent and Nominee Data</li> <li>Training and Qualification Data</li> </ul>	<ul style="list-style-type: none"> <li>Assessing if you're right for the job</li> </ul>
His Majesty's Revenue and Customs (HMRC)	<ul style="list-style-type: none"> <li>Identity Data</li> <li>Identity Number Data</li> <li>Contact Data</li> <li>Pay and Benefits Data</li> </ul>	<ul style="list-style-type: none"> <li>Calculating and paying tax and National Insurance</li> <li>Giving you access to benefits</li> </ul>

Third Parties	Categories of Data	Reasons for Sharing
Police and other Law Enforcement Agencies	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Attendance Data</li> <li>• CCTV Monitoring Data</li> </ul>	<ul style="list-style-type: none"> <li>• Responding to legal claims</li> <li>• Preventing fraud, money-laundering, and bribery, or other illegal acts</li> </ul>
Alcohol and Drug Testers	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Health Data</li> </ul>	<ul style="list-style-type: none"> <li>• Meeting health and safety rules</li> <li>• Preventing fraud, money-laundering, and bribery, or other illegal acts</li> </ul>
Providers of employee benefits like Pensions, Medical, and SAYE.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Identity Number Data</li> <li>• Contact Data</li> <li>• Dependent and Nominee Data</li> <li>• Pay and Benefits Data</li> <li>• Health Data</li> </ul>	<ul style="list-style-type: none"> <li>• Giving you access to benefits</li> </ul>
Consultants, Lawyers, Legal Professionals	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Performance Data</li> <li>• Attendance Data</li> <li>• Pay and Benefits Data</li> </ul>	<ul style="list-style-type: none"> <li>• Managing employee wellbeing and standards</li> <li>• Responding to legal claims</li> <li>• Supporting business planning and changes</li> <li>• Preventing fraud, money-laundering, and bribery, or other illegal acts</li> </ul>
Training Providers	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Attendance Data</li> <li>• Training and Qualification Data</li> </ul>	<ul style="list-style-type: none"> <li>• Planning training and development</li> <li>• Supporting under-performing staff</li> </ul>
Travel Companies and Hotels	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Attendance Data</li> </ul>	<ul style="list-style-type: none"> <li>• Booking work travel and transport</li> </ul>

Third Parties	Categories of Data	Reasons for Sharing
IT Providers, such as Microsoft hosting our email platform	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Performance Data</li> <li>• Attendance Data</li> </ul>	<ul style="list-style-type: none"> <li>• Boosting employee satisfaction</li> <li>• Providing access to IT systems and company sites</li> <li>• Managing your work schedule and rota</li> <li>• Protecting IT systems</li> <li>• Supporting business planning and changes</li> </ul>
Couriers	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> </ul>	<ul style="list-style-type: none"> <li>• Delivering IT equipment for remote or site work</li> </ul>

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## Transferring Data Outside of the United Kingdom

In limited circumstances we may store or transfer some of your personal data to countries outside the United Kingdom. To ensure your data stays secure, we take extra steps to protect it to the same standards it would have in the UK.

These transfers happen when we share your data with 'international organisations,' like Microsoft, based in various countries. We have put in place 'international data transfer agreements' with these organisations to safeguard your personal data and ensure they handle it per UK data protection laws.

In addition, we rely on Adequacy Decisions from the Information Commissioner's Office, which recognise certain countries outside the UK as having adequate data protection levels. We base some data transfers on these decisions.

If you would like a copy of these safeguards, please email us at [plc.gdprinfo@persimmonhomes.com](mailto:plc.gdprinfo@persimmonhomes.com).

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## **How Long We Keep Your Data**

We keep your data only for as long as necessary. In most cases, we will keep your data for a period after you stop working with us. Sometimes the law needs us to hold your data, such as keeping your tax deductions for six years.

To decide how long we keep your data, we consider its nature, sensitivity, how much of it we hold, and the potential risk to you if it is misused or disclosed. We also consider why we collected it, and any legal requirements.

When we no longer need your data, we will delete any electronic data from our IT systems and securely destroy any physical copies. If you want to know a specific retention period, please contact [plc.gdprinfo@persimmonhomes.com](mailto:plc.gdprinfo@persimmonhomes.com).

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## **Automated Decision-Making**

Automated decision-making means making decisions about you with no human involvement, like automatic face-scanning only using a computer. An example of this is if you consent to submitting an image of yourself to match to your Right to Work documentation, it will be automatically matched to the photograph on your submitted documentation.

If you do not wish to be subject to automated decision-making, disagree with the decision made, or you do not consent to your personal data being processed in this way, you can still continue with your application. Please contact our screening partner, Konfir on 03456 44 55 46, or email us using the contact details above.

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## **Updates to this Policy**

To make sure we always tell you about how and why we use your data, we routinely update this policy. Updates might be needed, for instance, if we change how we work and it affects your data.

We will let you know of any updates and adjust the 'Last Updated' date at the top of the document. Please review the policy from time to time for any changes.

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## **Making a Complaint**

We are committed to handling your personal data responsibly and to a high standard. If you have a concern about how we use your personal data, you have the right to make a complaint to us.

You can contact our data protection team at the email provided above. We will acknowledge your complaint and take appropriate steps to investigate it. We will then provide you with a response explaining our findings and any actions we have taken. We keep a record of complaints to help us improve our processes and prevent similar issues from arising in future.

You are also entitled to make a complaint to the Information Commissioner's Office (ICO), the UK regulator for data protection. You can do this at any time, including before or after raising a complaint with us.

You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF; by calling 0303 123 1113 (local rate) or 01625 545 745; or submitting a complaint online here: <https://ico.org.uk/make-a-complaint/>.

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