Leaver Privacy Notice

This privacy notice explains what data is collected about you, and why, as an employee of the XPS Group (XPS). This privacy notice is for employees who are leaving the business.

Who is the data controller?

A data controller is the person or organisation who determines what data to collect from you and how to use that data. A data controller is legally responsible for your data.

The data controller is your employer, as set out in your contract of employment, being:

XPS Pensions Consulting Limited, XPS Pensions Limited, XPS Administration Limited, XPS Investment Limited or XPS Pensions (RL) Limited or Penfida Ltd.

The contact address is:

Phoenix House, 1 Station Hill, Reading, RG1 1NB.

When we refer to 'we' and 'us' in this notice, we mean your employer.

What is the law?

The UK General Data Protection Regulation (GDPR) is the governing legislation for collecting and processing personal data.

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 to meeting our data protection obligations.

What information does the organisation hold?

We collect a range of information about you. This includes:

- 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 the organisation;
- information about your remuneration, including entitlement to benefits such as pensions or insurance cover;
- details of your bank account and national insurance number;
- information about your marital status, next of kin, dependants and emergency contacts;
- information about your nationality and entitlement to work in the UK;
- information about your criminal record (where applicable);
- 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, 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 and ratings, 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; and
- equal opportunities monitoring information including information about your ethnic origin, sexual orientation and religion or belief.

- Information you submit via the XPS whistleblowing process about a concern that you may have regarding issues arising within your workplace. XPS has appointed a third party through whom your report is made, and you do have the option to make a report anonymously,
- Information you submit via satisfaction surveys conducted by both XPS and third parties on behalf of XPS.
- Your image as part of CCTV in office locations,
- Your image in health and safety assessments, and if using in app ID verification as part of your disclosure check. Alternative assessments not using your image are available for both these purposes and
- Browsing data, usage statistics, and device identifiers if accessing guest Wi-Fi.

Data will be stored in a range of different places, including in your employee file, in the organisation's HR management systems and in other IT systems (including the organisation's email system).

Who has access to your data?

After the end of your employment, all electronic information will continue to be held securely.

Your information may be shared with internal and external auditors, if access to the data is necessary for performance of their roles.

The organisation shares your data with third parties in order to respond to preemployment reference requests from your new employer. In those circumstances the data will be subject to confidentiality arrangements.

Where you have accessed Occupational health services via XPS, your data will be held by the current Occupational Health provider to XPS. This entity is a data controller in their own right and will have their own data retention policy. Details of the current provider can be obtained from XPS HR.

We will not transfer your data outside the UK or European Economic Area.

How do we protect data?

We take the security of your data seriously and have formal, documented Information Security and Data Protection policies that set out the security measures currently implemented and maintained. These core policies are supported by additional policies covering:

- Data retention
- Physical security
- Data sharing and third-party requests (including DWP, Police etc)
- Acceptable usage (e.g. email, internet facilities, telephone)

These policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused, or disclosed.

Where we engage third parties to process personal data on our behalf, they do so on the basis of written instructions, under a duty of confidentiality and an obligation to implement appropriate technical and organisational measures to ensure the security of data.

How long do we keep data for?

The periods for which your data is held after the end of employment are set out below:	
All personal data & files (inc sensitive personal information & redundancy)	6 years after employment ends
Payroll / wages (including overtime and bonuses) / expenses	6 years from year end
Retirement benefits, incapacity, pension accounts and scheme records	6 years from end of scheme year or accounts completed

"Right to Work" documents	2 years after employment ends

What are your rights?

Data Protection Laws provide you with a number of rights, some of which do not apply to the data we process as a Data Controller. You may have the right to:

> be informed about the collection and use of your personal data; this will be done via the provision of privacy information (a privacy policy or notice).

> request copies of the personal data we hold about you and we will provide that within one calendar month. If you wish to do so you should contact us at recruitment@xpsgroup.com.

> correct any information that is incorrect, inaccurate, or incomplete.

> have your personal data erased

> restrict what we do with your information until we correct it or if you believe we are using your data unlawfully.

> move data from one provider of services to another

> object to automated decisions and profiling. We do not undertake any profiling activity. We do undertake some automated decision activity in relation to our use of an applicant tracking system for our Graduate/Internship recruitment. This system automatically sifts candidates out of the process if they do not meet pre-determined qualification criteria).

> object to the processing of your data in certain circumstances, including a right to object to our processing if our basis of processing is "legitimate interest" and you have grounds to object based on your particular situation, and an absolute right to object to the use of your data for direct marketing purposes.

> withdraw your consent to us processing your health information (which will only be the case if you have sent us that information). Any processing we undertake shall remain lawful until such time as you withdraw your consent.

The above rights are always subject to a right for us to keep your data so as to be able to defend any future legal claims.

If you would like to exercise any of these rights, please contact recruitment@xpsgroup.com.

How to complain

If you believe that we have not complied with your data protection rights, or your data has been mishandled you can complain to us or the Information Commission. To complain to us, please contact recruitment@xpsgroup.com.

What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to us during the recruitment process. However, if you do not provide the information, we may not be able to process your application properly or at all.

Where can you get an up-to-date copy of this notice?

We will ensure that a copy of all of our privacy notices is regularly updated and provided on our website.