

JOB APPLICANTS AND EMPLOYEE PRIVACY NOTICE

This Privacy Notice describes how Young & Co.'s Brewery, P.L.C., and its group of companies, ("we", "us" or "our") uses and collects your personal data before, during and after your working relationship with us; it is therefore important that you read its contents.

1. Introduction

For the purposes of this Privacy Notice, "Data Protection Laws" means UK Data Protection Act 2018, the Privacy and Electronic Communications Regulations, UK General Data Protection Regulation and any other applicable legislation concerning the processing of personal data.

We collect and process personal data relating to our employees to manage our employment relationship with you. We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations.

We are the data controller, and this means that we are responsible for deciding how we hold and use personal information about you. We have appointed a data protection officer (DPO) who is responsible for monitoring our data protection compliance and we have set out details of how you can contact the DPO in section 10.

We will only use your personal data for the purposes set out below. If we need to use your personal data for a different purpose, we will notify you and we will explain the legal basis which allows us to do so.

2. What information do we collect?

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

- your name, address and contact details, including email address and telephone number, date of birth, country 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 pay, including entitlement to benefits such as pensions, life assurance or medical 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 (including passport details);
- information about any unspent criminal convictions;
- details of your work pattern and attendance at work;
- CCTV images;
- photographs and video footage;
- swipe card information (if applicable);
- your ICT usage (if applicable);
- your use of pool vehicles or company car (if applicable);
- details of periods of leave taken by you, including holiday, sickness absence, family leave, 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;
- training records;
- trade union membership;
- religion and / or philosophical beliefs;
- information about medical or health conditions, including whether or not you have a disability for which we need to make reasonable adjustments; and
- equal opportunities monitoring information, including information about your ethnic origin.

Personal information about other individuals

If you provide us with information about other individuals (e.g. your next of kin), you confirm that you have informed the relevant individuals accordingly.

We may collect this information in a variety of ways. For example, data might be collected through application forms and CVs; obtained from your passport or other identity documents; 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 also collect personal data about you from third parties, such as references supplied by former employers.

Data will be stored in a range of different places, including in your personnel file, in our HR management systems and in other IT systems (including our email system).

3. Why do we process personal data?

We use your personal data for the following purposes listed in this section.

We are allowed to process your personal data on the following legal bases:

Contract

We need to process data to enter into an employment contract with you and to meet our contractual obligations. For example, we need to process your data to provide you with an employment contract, to pay you in accordance with your employment contract and to administer your benefits, including your pension, life assurance and medical insurance entitlements.

Consent

You have given your explicit consent for us to process your personal data e.g. ethnic/religious background for the following purposes of diversity monitoring. If we have consent to use your personal information for any particular reason, you have the right to remove your consent at any time and you have the right to remove your consent at any time by contacting the DPO.

Legal Obligation

In some cases, we need to process data to ensure that we are complying with our legal obligations and for establishing, exercising or defending our legal rights. For example, we are required to check your entitlement to work in the UK, to deduct tax, to comply with health and safety laws and to enable you to take periods of leave to which you are entitled. We also need to process your personal data to carry out our obligations as your employer, for example, putting

in place specific equipment in our offices to cater for particular physical conditions our staff may have.

Legitimate Interest

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

We are allowed to process your special categories of personal data for the following reasons and on the following legal bases:

Vital Interest

It is necessary for us to process your medical/health information, for the purposes of protecting your health and safety during the course of your employment.

Processing employee data allows us to:

- run recruitment and promotion processes;
- assess your suitability for a role with us;
- 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;
- 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 absence and absence management procedures, to allow effective workforce management and ensure that you are receiving the pay or other benefits to which you are entitled;
- obtain occupational health advice, to ensure that we comply with duties in relation to individuals with disabilities, meet our 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 we comply with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled;
- carry out internal communication about our employees and the roles they play in our business;
- feature our employees in online marketing material;
- ensure effective general HR and business administration;
- provide references on request for current or former employees; and
- maintain and promote equality in the workplace.

We may process some special categories of personal data, such as information about employees racial or ethnic origin, religious or philosophical beliefs, sexual orientation, trade union membership, disabilities, health relation information or medical conditions. These types of data are often processed:

- in accordance with any explicit consent provided by you for one or more specified purposes;
- to carry out our employment law and other legal rights and obligations (such as those in relation to employees with disabilities);
- to protect your vital interests or the interests of another person;
- to ensure equal opportunity monitoring and reporting;
- to establish, exercise or defend legal claims; and
- to assess your working capacity.

4. Who has access to data?

We share your personal data with the following categories of third parties as necessary to operate our business:

- service providers and suppliers assisting with our business activities, business associates, customers, payment services providers, hosting providers, providers of IT support, advertising platforms, providers of booking systems, providers of cloud-based software or services used by us, accounting firms and law firms;
- ombudsman, regulators, public authorities and security organisations, such as the police, HM Revenue & Customs (HMRC) and the Information Commissioner's Office (ICO), to the extent required by law, regulation, court order or if necessary to establish, exercise or defend our legal rights, including if we suspect fraud or attempted fraud;
- companies in the same group as us;
- current, past and prospective employers, recruitment and employment agencies, trade and employer associations and professional bodies and educators and examining bodies;
- financial organisations and advisors, credit reference agencies, debt collection and tracing agencies, and tenants;
- employees including members of the People and Payroll Teams, your line manager, managers/people in the business area in which you work and agents and temporary workers;
- people, companies or groups in the context of a sale of some or all of our business;
- people, companies or groups in connection the provision of benefits and the provision of occupational health services; and
- family, associates and representatives of the person whose personal data we are processing.

Some of these organisations will be controllers of your personal data e.g. regulators, government, any company purchasing part of our business. They will have their own privacy notice describing what data they process and for what purposes.

5. Transfer of your personal data outside of the UK or the European Economic Area (EEA)

Some third parties to whom we transfer your personal data may be located outside of the UK or the EEA. Any transfer of your data will be carried out in accordance with the law to safeguard your privacy rights and give you remedies in the unlikely event of a security breach. If you want to know more about how data is transferred, please contact us using the details in section 10 of this Privacy Notice.

6. How do we protect data?

We are committed to protecting your personal data and to keeping it safe and confidential. We will therefore ensure that appropriate technical and organisational physical, electronic and procedural safeguards are implemented to protect it. Access to your personal data will also be limited to our employees and certain third parties who process it on our behalf. We aim to ensure that the level of security and the measures adopted to protect your personal data are appropriate for the risks presented by the nature and use of your personal data. We follow recognised industry practices for protecting our IT environment and physical facilities.

7. How long do we keep data for?

We will hold your personal data for the duration of your employment with us. The periods for which your data is held after the end of employment are a minimum of 6 years after all post-employment benefits arising from your employment with us ends. CCTV footage is retained in accordance with our CCTV policy.

8. Your rights

You have the following rights, under the Data Protection Laws:

- To access personal data we have collected about you

You may ask to see what personal data we hold about you and be provided with:

- a copy of the personal data;
 - details of the purpose for which the personal data is being or is to be processed;
 - details of the recipients or classes of recipients to whom the personal data is or may be disclosed, including if they are overseas and what protections are used for those overseas transfers;
 - the period for which the personal data is held (or the criteria we use to determine how long it is held);
 - any information available about the source of that data; and
 - whether we carry out an automated decision-making, or profiling, and where we do information about the logic involved and the envisaged outcome or consequences of that decision or profiling.
- To update or amend the personal data we have collected about you if it is inaccurate or incomplete.

You can require us to correct any mistakes in your information which we hold. If you would like to do this, please let us know what information is incorrect and what it should be replaced with.

- To erasure

You can ask us to erase your personal data where:

- you do not believe that we need your data in order to process it for the purposes set out in this Privacy Notice;
- if you had given us consent to process your data, you withdraw that consent, and we cannot otherwise legally process your data
- you object to our processing and we do not have any legitimate interests that mean we can continue to process your data; or

- your data has been processed unlawfully or have not been erased when it should have been.
- To restrict the processing of the personal data we have collected about you

You may request that we stop processing your personal data temporarily if:

- you do not think that your data is accurate. We will start processing again once we have checked whether or not it is accurate;
 - the processing is unlawful, but you do not want us to erase your data;
 - we no longer need the personal data for our processing, but you need the data to establish, exercise or defend legal claims; or
 - you have objected to processing because you believe that your interests should override our legitimate interests
- To object to the processing of the personal data we have collected about you, including in respect of any data processed for direct marketing purposes

You may object to us processing your personal data where we rely on a legitimate interest as our legal grounds for processing. If you object to us processing your personal data, we must demonstrate compelling grounds for continuing to do so.

- To have your personal data ported to another controller under the right of portability

You may ask for an electronic copy of your personal data which we hold electronically and which we process when we have entered into a contract with you. You can also ask us to provide this directly to another party.

- In relation to automated decision making

We do not make any automated decisions about you, so these rights do not apply.

- To withdraw any consents, you have provided in respect of our processing of your personal data

Where we process data based on your consent, you have the right to withdraw consent you have given us at any point. This is a vital and necessary aspect of consent. To withdraw your consent, you can contact us at the details in the 'How to contact us' section. Note that any processing carried out prior to the date of withdrawal of your consent will still be valid and any published personal data cannot be retracted.

- To lodge a complaint with the ICO

If you do not think that we have processed your data in accordance with this Privacy Notice, you should let us know as soon as possible. You also have the right to complain to the ICO. Information about how to do this is available on the ICO website (www.ico.org.uk)

To exercise any of these rights, please contact using the details set out in section 10 of this Privacy Notice.

9. What if you do not provide personal data?

You have some obligations under your employment contract to provide us with data. In particular, you are required to report absences from work 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 us 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 eligibility to work in the UK and payment details, have to be provided to enable us to enter into a contract of employment with you. If you do not provide other information, this will hinder our ability to administer the rights and obligations arising from our employment or potential pre-employment relationship with you efficiently.

10. Contact information

If you have any comments or questions, please contact us at Copper House, 5 Garratt Lane, Wandsworth, SW18 4AQ, marked for the attention of our DPO, via telephone 020 8875 7000, or via email: privacy@youngs.co.uk

11. Changes to this Privacy Notice

From time to time, we may change this Privacy Notice. Changes made to it will be notified to you. We may also let you know in other ways from time to time about the processing of your personal data.

Last Updated: 09 December 2024