

Data Privacy Notice

1) Introduction

Quality Plated Products Ltd & Kandra Ltd (herein known collectively as QPP) acting as a Data Controller, is committed to protecting the rights of individuals in line with the General Data Protection Regulation (GDPR).

(GDPR) requires data controllers to inform their employees or individuals what information they hold on them and places an emphasis on making privacy notices more transparent and accessible.

A privacy notice is supplied to all employees and or individuals when they provide the Company with their personal data.

2) What information do we collect about you?

The GDPR defines personal data as the following:

‘Any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;’

Personal data relating to employees can include name, job title, date of birth, passport data, home address, home telephone number, private email address, emergency contact, staff number etc.

‘Special categories’ of personal data (sensitive personal data) relate to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation.

3) What is our legal basis for processing and using your personal data?

For processing to be lawful under the GDPR, it must be for one of the reasons as stated in the table below (6 legal basis under GDPR).

We collect and process various categories of personal information including those above. Most of the information is supplied to us by you so that we can carry out our internal processes.

We may also collect information from the technology that is assigned to you for day-to-day activities.

For us to protect you, for example to prevent fraud and or, for us to provide your information in the course of ascertaining medical and or emergency assistance, we will have to provide your personal data which can include personal characteristics.

Where permitted by the law, we may process information about criminal convictions or offences and alleged offences for specific and limited activities and purpose – such as to perform checks to prevent crime, compliance to immigration checks, money laundering Regulations, fraud, bribery and corruption and or for any other legal sanctions / reasons.

Article 6 (GDPR):

Legal basis for processing:

1) The data subject has given *consent* to the processing.

2) Processing is necessary for the performance of a *contract* with the data subject.

3) Processing is necessary for compliance with a *legal obligation*.

Article 9 (GDPR) - Special Categories and or Purpose of Processing Information:

The data subject has given *explicit consent* to the processing. i.e. when a person provides their consent to the data processor / controller to use their personal information.

Processing is necessary for the purposes of carrying out the obligations of the controller or of the data subject in the field of *employment*. E.g. for when carrying out a task, activity or role:

- *Administration for: starting a role, payroll and finance*
- *Providing employee support services (Benefits and Welfare including the employee's medical and general health and safety)*
- *QPP Specifications and Standards.*
- *Providing IT and information services*
- *Carrying out analysis and reporting*
- *Ensuring employee's safety and security*
- *Formal procedures*
- *Providing operational information*
- *Internal and External Communications*
- *Site Access and Employee Identification*
- *Preventing and detecting crime*
- *Travel and accommodation*
- *Monitoring equal opportunities*
- *Company Structures/ Organisation Charts*
- *Operational shifts, rotas, plans, reports and communications*
- *Training and development document as part of a role*

Processing is necessary to protect the *vital interests* of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent. E.g. Should there be requests from any law enforcement agency/ authority – County Courts.

- 4) Processing is necessary in order to protect the *vital interests* of the data subject or of another natural person. Processing is carried out during its legitimate activities by a foundation, association or any other *not-for-profit* body with a political, philosophical, religious or trade union aim. E.g. in the case of a humanitarian and or charitable pursuits.
- 5) Processing is necessary for the performance of a task carried out in the *public interest*. Processing relates to personal data which are made *public* by the data subject. i.e. the person's data is already in the public domain, and it is accessible by the general public.
- 6) Processing is necessary for the purposes of the *legitimate interests* pursued by the controller or by a third party. Processing is necessary for the establishment, exercise or defence of *legal claims* or whenever courts are acting in their judicial capacity. E.g. for a Health & Safety claim.
- Processing is necessary for reasons of *substantial public interest*
- Processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of *health or social care* or treatment, or the management of health or social care systems
- Processing is necessary for reasons of public interest in the area of *public health*
- Processing is necessary for *archiving purposes* in the public interest, scientific or historical research purposes or statistical purposes

More information relating to conditions for processing can be found on the Information Commission Office (ICO's) website (www.ico.com)

4) Who receives your information?

As part of the Company's internal processes and working with external providers, your information is processed internal but also, it is used by the Company's service providers to provide the necessary employee benefits and on-going requirements as part of your employment. E.g. Focus, Sage Payroll, Aviva, Liability Insurers and Brokers, Car Leasing and fuel companies.

5) How long will your information be held for?

We do not keep personal information for longer than what is required and in most cases, this is six (6) years after the end of employment unless it is for some other legitimate basis (for example due to a court order or investigation by law enforcement agencies from time to time).

6) What are your rights?

You have a right to control what we do with your personal information and to access your information, to object to the processing of your personal information, to rectify, to erase, to



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restrict and to port your personal information. Please visit the ICO webpage for further information in relation to your rights.

Any requests or objections should be made in writing to the Company: -

Quality Plated Products Ltd

Shady Lane,

Great Barr,

Birmingham B449ER

7) Security of your information

We are committed to ensuring that your information is secure with us and third parties who act on our behalf. We may use tools to make sure that your information remains confidential and accurate, and we may monitor all forms of electronic communication in order for us to protect you and us.