

1. Introduction

This Policy sets out the registered in <<insert couregistration number>>, w Company") regarding data "employee data subjects") (all legislation and regulation data and the privacy of el Regulation 2016/679 Ge Protection Act 2018, and regulation relating to data p EU law has legal effect in t

This Policy sets out the C transfer, storage, and disp The procedures and princ Company, its employees, a the Company.

2. Definitions

"consent"

"data controller"

"data processor"

"data subject"

"EEA"

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Company name>>, a company under number <<insert company is at <<insert address>> ("the of its employees (in this context, al data under Data Protection Law ime regulating the use of personal including, but not limited to, EU Regulation ("GDPR"), the Data n or other directly applicable EU as long as, and to the extent that,

arding the collection, processing, lating to employee data subjects. st be followed at all times by the other parties working on behalf of

onsent of the data subject which eely given, specific, informed, and s indication of the data subject's hich they, by a statement or by a tive action, signify their agreement ssing of personal data relating to

natural or legal person or which, alone or jointly with others, the purposes and means of the f personal data. For the purposes cy, the Company is the data all personal data relating to ta subjects;

natural or legal person or which processes personal data a data controller;

iving, identified, or identifiable on about whom the Company ial data (in this context, employee s);

European Economic Area, all EU Member States, Iceland,

1



h, and Norway;

information relating to a data can be identified, directly or particular by reference to an ich as a name, identification ation data, an online identifier, or re factors specific to the physical, , genetic, mental, economic, pocial identity of that data subject;

each of security leading to the or unlawful destruction, loss, unauthorised disclosure of, or ersonal data transmitted, stored, processed;

operation or set of operations on personal data or sets of a, whether or not by automated ch as collection, recording, structuring, storage, adaptation n, retrieval, consultation, use, y transmission, dissemination or naking available, alignment or restriction, erasure or

rocessing of personal data in such at the personal data can no longer to a specific data subject without ditional information, provided that nal information is kept separately ct to technical and organisational ensure that the personal data is d to an identified or identifiable on; and

nal data revealing racial or ethnic itical opinions, religious or beliefs, trade union membership,

"personal data"

"personal data breach"

"processing"

"pseudonymisation"

"special category person















ual sexual orientation. life, genetic data.

letter of the law, but also to the e on the correct, lawful, and fair legal rights, privacy, and trust of

</insert name of data protection he Data Protection Officer is <<insert department, e.g. HR] for administering this Policy and able related policies, procedures,

managers, department heads, iring that all employees, agents, alf of the Company comply with ement such practices, processes, ly necessary to ensure such

Data Protection Law should be particular, the Data Protection bwing cases:

to the lawful basis on which cted, held, and/or processed;

der to collect, hold, and process

to the retention period for any al data:

otices or similar privacy-related

ealing with the exercise of an cluding, but not limited to, the

br actual) has occurred;

to security measures (whether to protect employee personal

hared with third parties (whether ontrollers or data processors);

ansferred outside of the EEA and al basis on which to do so:

activity is to be carried out, or to existing processing activities, npact Assessment;

be used for purposes different to ted:

3. Scope

- 3.1 The Company is co spirit of the law and handling of all perso all individuals with w
- 3.2 The Company's Da officer>>, <<insert responsible [, wor Department, or posit for developing and and/or guidelines.
- 3.3 All <<insert appli supervisors etc.>> contractors, or othe this Policy and, whe controls, and trair compliance.
- 3.4 Any questions relat referred to the Dat Officer should alway
 - if there is a) employee pe
 - b) if consent is employee pe
 - if there is a c) particular typ
 - if any new d) documentatio
 - e) if any assis employee d handling of s
 - f) if a personal
 - if there is a g) technical or data:
 - if employee h) such third pa
 - i) if employee there are que
 - j) when any si significant ch which will red
 - when employ k) those for whi

- I) if any autom making, is to
- m) if any assist direct marke

4. The Data Protection Princ

This Policy aims to ensure the following principles with controllers are responsible All personal data must be:

- 4.1 processed lawfully, subject;
- 4.2 collected for spec processed in a ma processing for arch research purposes incompatible with th
- 4.3 adequate, relevant purposes for which
- 4.4 accurate and, wher be taken to ensure purposes for which
- 4.5 kept in a form which necessary for the pr data may be store processed solely for historical research pr of the appropriate GDPR in order to sa
- 4.6 processed in a mar including protection accidental loss, d organisational meas

5. The Rights of Data Subje

The GDPR sets out the foll

- 5.1 the right to be inform
- 5.2 the right of access;
- 5.3 the right to rectificat
- 5.4 the right to erasure
- 5.5 the right to restrict p
- 5.6 the right to data por
- 5.7 the right to object; a
- 5.8 rights with respect t

g profiling or automated decision-

plying with the law applicable to

otection Law. The GDPR sets out personal data must comply. Data o demonstrate, such compliance.

ent manner in relation to the data

imate purposes and not further ble with those purposes. Further blic interest, scientific or historical shall not be considered to be

is necessary in relation to the

date. Every reasonable step must s inaccurate, having regard to the , or rectified without delay;

data subjects for no longer than is sonal data is processed. Personal ofar as the personal data will be the public interest, scientific or irposes, subject to implementation tional measures required by the eedoms of the data subject;

riate security of the personal data, r unlawful processing and against using appropriate technical or

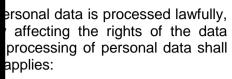
le to data subjects:

to be forgotten');

king and profiling.

6. Lawful, Fair, and Transpa

- 6.1 Data Protection Lav fairly, and transpar subject. Specifically be lawful only if at let
 - a) the data sub data for one
 - b) the processi the data sub the data sub
 - c) the processi which the da
 - d) the process subject or of
 - e) the processi the public in data controll
 - f) the processi pursued by interests are data subject where the da
- 6.2 If the personal data as 'sensitive persor met in addition to or
 - a) the data sul such data f Member Sta
 - b) the process obligations a data subjec protection la law or a coll provides for interests of t
 - the processi subject or physically or
 - d) the data con with a politi processing provided tha members of connection disclosed ou
 - e) the processi by the data s



o the processing of their personal s;

erformance of a contract to which er to take steps at the request of a contract;

pliance with a legal obligation to

ect the vital interests of the data

erformance of a task carried out in of official authority vested in the

urposes of the legitimate interests a third party, except where such mental rights and freedoms of the on of personal data, in particular

tegory personal data (also known f the following conditions must be ut above:

licit consent to the processing of ed purposes (unless EU or EU n doing so);

he purpose of carrying out the hts of the data controller or of the ment, social security, and social rised by EU or EU Member State int to EU Member State law which for the fundamental rights and

ect the vital interests of the data son where the data subject is ig consent;

sociation, or other non-profit body bus, or trade union aim, and the ourse of its legitimate activities, solely to the members or former who have regular contact with it in that the personal data is not e consent of the data subjects;

ta which is manifestly made public



- f) the process whenever co
- g) the processi the basis of to the aim protection, a safeguard th
- h) the process occupationa an employee care or treat or services o a contract v safeguards r
- i) the processi public healt threats to h health care a of EU or EU measures to particular, pr
- j) the process interest, sc purposes in EU Member respect the suitable and and the inter

7. Consent

If consent is relied upon as any personal data, the follo

- 7.1 Consent is a clea processing of their pa statement or a punikely to amount t
- 7.2 Where consent is section dealing with matters.
- 7.3 Data subjects are f easy for them to do be honoured promp
- 7.4 If personal data is t with the purpose of collected that was their consent, cons obtained from the d
- 7.5 Where special cat normally rely on a la

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the conduct of legal claims or dicial capacity;

tantial public interest reasons, on a law which shall be proportionate the essence of the right to data uitable and specific measures to interests of the data subject;

he purposes of preventative or ssment of the working capacity of for the provision of health or social ht of health or social care systems Member State law or pursuant to al, subject to the conditions and of the GDPR;

lic interest reasons in the area of ing against serious cross-border tandards of quality and safety of s or medical devices, on the basis n provides for suitable and specific d freedoms of the data subject (in

rchiving purposes in the public search purposes, or statistical 9(1) of the GDPR based on EU or proportionate to the aim pursued, data protection, and provide for safeguard the fundamental rights

ecting, holding, and/or processing

subject that they agree to the ar indication may take the form of pre-ticked boxes, or inactivity are

hich includes other matters, the clearly separate from such other

at any time and it must be made draws consent, their request must

erent purpose that is incompatible hat personal data was originally a subject when they first provided e or purposes may need to be

processed, the Company shall plicit consent. If explicit consent is

relied upon, the dat notice in order to ca

7.6 In all cases where holding, and/or proc obtained in order to with consent require

8. Specified, Explicit, and Lo

- 8.1 The Company colle Parts 23 to 28 of thi
 - a) personal dat and]
 - b) [personal da
- 8.2 The Company only the specific purpos purposes expressly
- 8.3 Employee data sub purposes for which 15 for more informa

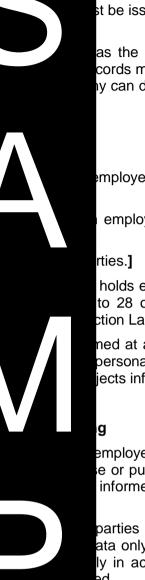
9. Adequate, Relevant, and

- 9.1 The Company will c the extent necessar data subjects have and as set out in Pa
- 9.2 Employees, agents Company may colle the performance of Excessive personal
- 9.3 Employees, agents Company may proc their job duties rec cannot be processe

10. Accuracy of Data and Ke

- 10.1 The Company sha processed, and hele not limited to, the re data subject, as set
- 10.2 The accuracy of em and at [regular] **OR** personal data is fou be taken without de
- 10.3 It is the responsibili personal data they such personal data

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st be issued with a suitable privacy

as the lawful basis for collecting, cords must be kept of all consents ly can demonstrate its compliance

mployee personal data set out in

employee data subjects[.] OR [;

holds employee personal data for to 28 of this Policy (or for other ction Law).

ned at all times of the purpose or personal data. Please refer to Part jects informed.

employee personal data for and to e or purposes of which employee informed) as under Part 8, above,

parties working on behalf of the ata only to the extent required for ly in accordance with this Policy. ed.

parties working on behalf of the lata only when the performance of conal data held by the Company ons.

ployee personal data collected, nd up-to-date. This includes, but is ata at the request of an employee

all be checked when it is collected ervals thereafter. If any employee it-of-date, all reasonable steps will at data, as appropriate.

e data subjects to ensure that the ompany is kept up-to-date. If any should ensure that the relevant member of staff a possible. The Com meet its obligations

11. Data Retention

- 11.1 The Company shal necessary in light collected, held, and
- 11.2 When employee pe be taken to erase o
- 11.3 For full details of retention periods fo refer to our Data Re

12. Secure Processing

- 12.1 The Company shal and processed is k processing and ag details of the techn provided in Parts 29
- 12.2 All technical and or data shall be regulated or the shall be r
- 12.3 Data security must integrity, and availa
 - a) only those w data and wh
 - employee pe or purposes
 - c) authorised u data as requ

13. Accountability and Recor

- 13.1 The Data Protectio <<insert departmen for administering applicable related p
- 13.2 The Company shal collecting, holding, Impact Assessmer significant risk to th refer to Part 14 for f
- 13.3 All employees, age Company shall be addressing the rele other applicable Co

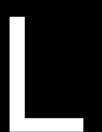
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prmed as soon as is reasonably peration of its employees to help aw.

rsonal data for any longer than is oses for which it was originally

required, all reasonable steps will securely and without delay.

ach to data retention, including /pes held by the Company, please

ee personal data collected, held, against unauthorised or unlawful destruction, or damage. Further neasures which shall be taken are

ken to protect employee personal aluated to ensure their ongoing mployee personal data.

s by protecting the confidentiality, onal data as follows:

ccess and use employee personal may access and use it;

urate and suitable for the purpose neld, and processed; and

ole to access employee personal irpose or purposes.

nsible [, working together with the or position, e.g. HR Manager>>,] veloping and implementing any or guidelines.

sign' approach at all times when e personal data. Data Protection if any processing presents a f employee data subjects (please

r parties working on behalf of the ig in data protection and privacy, rotection Law, this Policy, and all

- 13.4 The Company's da evaluated by means
- 13.5 The Company sha data collection, hole information:
 - a) the name ar any applicab other data c
 - b) the purpose employee pe
 - c) the Compar consent, the such conse personal dat
 - d) details of the processed t subject to wl
 - e) details of a countries inc
 - f) details of he Company (p
 - g) details of em
 - h) detailed des taken by the data.

14. Data Protection Impact A

- 14.1 In accordance with out Data Protection new uses of emp technologies and w to the rights and fre
- 14.2 The principles of ' collecting, holding, factors should be ta
 - a) the nature, sholding, and
 - b) the state of measures to
 - c) the cost of ir
 - d) the risks po including the
- 14.3 Data Protection Imp Officer and shall ad
 - a) the type(s) of processed;













e shall be regularly reviewed and

ecords of all employee personal ich shall incorporate the following

y, its Data Protection Officer, and ers (including data processors and sonal data is shared);

y collects, holds, and processes

es (including, where applicable, ning such consent, and records of ling, and processing employee

personal data collected, held, and he categories of employee data lates;

yee personal data to non-EEA nd security safeguards;

nal data will be retained by the ny's Data Retention Policy);

rage, including location(s);

al and organisational measures ne security of employee personal

y by Design

rinciples, the Company shall carry r any and all new projects and/or which involve the use of new lved is likely to result in a high risk subjects.

Id be followed at all times when ree personal data. The following

ose or purposes of the collection,

ant technical and organisational

res; and

subjects and to the Company,

e overseen by the Data Protection

ta that will be collected, held, and



15. Keeping Data Subjects In

b)

c)

d)

e)

f)

g)

h)

i)

- 15.1 The Company shall employee data subj
 - a) Where emp data subjec purpose at tl
 - b) where empl relevant empl
 - i) if the data
 - ii) if the that t
 - iii) as so one r

15.2 The following inform

- a) details of the details, and representativ
- b) the purpose and will be p the lawful ba
- c) where applic justifying its
- d) where the e employee da processed;
- e) where the e third parties,
- f) where the e that is locate not limited t further detai
- g) details of ap

ersonal data is to be used;

used;

vho are to be consulted;

he data processing with respect to ocessed;

s;

mpany; and handle identified risks.

set out in Part 15.2 to every data

collected directly from employee subjects will be informed of its

obtained from a third party, the period of its purpose:

communicate with the employee mmunication is made; or

ansferred to another party, before

le and in any event not more than data is obtained.

n the form of a privacy notice:

not limited to, all relevant contact nact details of any applicable on Officer;

e personal data is being collected Parts 23 to 28 of this Policy) and on and processing;

rests upon which the Company is of the employee personal data;

is not obtained directly from the es of personal data collected and

s to be transferred to one or more

s to be transferred to a third party stails of that transfer, including but ce (see Part 32 of this Policy for

eriods;







- h) details of the
- i) details of the the Compar applicable);
- j) details of t Information the GDPR);
- k) where the employee da
- where applie obligation ne personal dat and
- m) details of a place using decisions wi consequenc

16. Data Subject Access

- 16.1 Employee data sub time to find out mor them, what it is doir
- 16.2 Employees wishing Request Form, sen <<insert contact det
- 16.3 Responses to SAF however, this may and/or numerous re data subject shall be
- 16.4 All SARs received s [in accordance with Procedure].
- 16.5 The Company does Company reserves information that has for requests that a such requests are re

17. Rectification of Personal

- 17.1 Employee data sub their personal data
- 17.2 The Company shall the employee data employee data subj extended by up to additional time is re
- 17.3 In the event that ar

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rights under the GDPR;

s right to withdraw their consent to personal data at any time (where

ject's right to complain to the (the 'supervisory authority' under

is not obtained directly from the the source of that personal data;

al or contractual requirement or and processing of the employee sequences of failing to provide it;

making or profiling that will take lata, including information on how ance of those decisions, and any

access requests ("SARs") at any a which the Company holds about , and why.

uld do using a Subject Access npany's Data Protection Officer at

ade within one month of receipt; vo months if the SAR is complex ch additional time is required, the

Company's Data Protection Officer ubject Access Request Policy and

he handling of normal SARs. The nable fees for additional copies of to an employee data subject, and or excessive, particularly where

uire the Company to rectify any of nplete.

sonal data in question, and inform cation, within one month of the ny of the issue. The period can be se of complex requests. If such a subject shall be informed.

rsonal data has been disclosed to

11

third parties, those made to that persor

18. Erasure of Personal Data

- 18.1 Employee data sub the personal data it
 - a) it is no lon personal dat collected or
 - b) the employe applicable) data;
 - c) the employ processing t interest to al Policy for fur
 - d) the employe
 - e) the employe Company to
 - f) [the employ purpose of p
- 18.2 Unless the Compa personal data, all employee data subj the employee data subj months in the case employee data subj
- 18.3 In the event that an to an employee da those parties shall t require disproportio

19. Restriction of Personal D

- 19.1 Employee data subj Company ceases p employee data subj the amount of emp that is necessary to further.
- 19.2 In the event that ar third parties, those processing it (unles do so).

20. [Data Portability

20.1 The Company pr

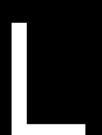
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S











d of any rectification that must be

equest that the Company erases ollowing circumstances:

Company to hold that employee pose(s) for which it was originally

to withdraw their consent (where g and processing their personal

s to the Company holding and there is no overriding legitimate inue doing so) (see Part 21 of this he right to object);

n processed unlawfully;

to be erased in order for the legal obligation[;] **OR** [.]

ing held and processed for the ety services to a child.]

nds to refuse to erase employee hall be complied with, and the ure, within one month of receipt of riod can be extended by up to two uch additional time is required, the

a that is to be erased in response s been disclosed to third parties, e (unless it is impossible or would

ed circumstances, request that the data it holds about them. If an est, the Company shall retain only icerning that data subject (if any) I data in question is not processed

rsonal data has been disclosed to d of the applicable restrictions on d require disproportionate effort to

relating to employees using

automated means.

- 20.2 Where employee d processing their p otherwise required and the employee of the GDPR, to rece purposes (namely t
- 20.3 To facilitate the right applicable personal
 - a) <a) <
 - b) <<add further
- 20.4 Where technically personal data shall
- 20.5 All requests for co within one month o extended by up to t such additional time

21. Objections to Personal D

- 21.1 Employee data sub their personal dat (including profiling), statistics purposes.
- 21.2 Where an employe personal data base processing immedia legitimate grounds interests, rights, ar conduct of legal clai
- 21.3 Where an employe personal data for d processing promptly
- 21.4 Where an employe personal data for s the employee data relating to his or h comply if the resea for reasons of public

22. [Automated Processing,

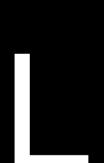
a)

- 22.1 [The Company use decision-making pro
 - <<Insert det
- 22.2 [The Company us purposes as follows
 - a) <<Insert det











ated processing>>.

their consent to the Company to a manner, or the processing is a contract between the Company ata subjects have the right, under onal data and to use it for other a controllers).

Company shall make available all ubjects in the following format[s]:

by an employee data subject, uired data controller.

phal data shall be complied with ject's request. The period can be complex or numerous requests. If e data subject shall be informed.]

bject to the Company processing interests, for direct marketing itific and/or historical research and

to the Company processing their ts, the Company shall cease such emonstrated that the Company's rride the employee data subject's processing is necessary for the

to the Company processing their s, the Company shall cease such

to the Company processing their research and statistics purposes, ne GDPR, "demonstrate grounds The Company is not required to performance of a task carried out

aking, and Profiling

ning its employees in automated

n-making>>.]

rning its employees for profiling

>.]

- 22.3 The activities desc Protection Law wh significant effect on
 - a) the data sub
 - b) the processi
 - c) the process contract bet
- 22.4 If special category processing can only
 - a) the data sub
 - b) the processi
- 22.5 Where decisions an profiling), employee decisions, request h to obtain an explar subjects must be ex
- 22.6 In addition to the at subjects explaining the significance and
- 22.7 When employee pe automated decision
 - a) appropriate
 - b) technical and minimise the them to be e
 - all personal order to pre this Policy measures).]

23. Personal Data

The Company holds a rapersonal data shall be coll data subjects' rights and t Policy. The Company may detailed in Parts 23 to 28 the Company's Data Reten

- 23.1 Identification inform
 - a) Name;
 - b) Contact Deta
 - c) <<add furthe
- 23.2 Equal opportunities further information):
 - a) Age;

e generally prohibited under Data sions have a legal or similarly e of the following applies:

cit consent;

þr

entry into, or performance of, a he data subject.

processed in this manner, such he following applies:

cit consent; or

ns of substantial public interest.

automated processing (including right to object, to challenge such press their own point of view, and om the Company. Employee data ght at the first point of contact.

ust be provided to employee data decision-making or profiling, and so of the decision or decisions.

ny form of automated processing, following shall apply:

I procedures shall be used;

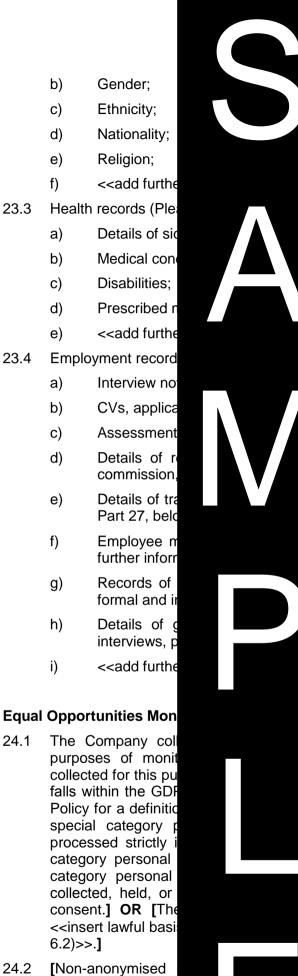
sures shall be implemented to cour, such measures must enable

this manner shall be secured in ts arising (see Parts 29 to 34 of lata security and organisational

about its employees. Employee sed in accordance with employee is under the GDPR and with this cess the employee personal data of data retention, please refer to

es:

Please refer to Part 24, below, for



w. for further information):

rs, and similar documents; and similar documents:

alaries, pay increases, bonuses, expenses:

where applicable) [(please refer to)**1**;

ease refer to Part 28, below, for

uding reports and warnings, both

cumentary evidence, notes from outcomes:

sses certain information for the es. Some of the personal data ethnic origin and religious beliefs, category data (see Part 2 of this h data will be anonymised. Where it will be collected, held, and conditions for processing special t 6.2 of this Policy. [No special opportunities monitoring will be relevant employee data subject's sis for processing such data is ategory data (as listed under Part

nitoring information] OR [Equal be accessible and used only by

24. **Equal Opportunities Mon**

- 24.1
- 24.2 opportunities monit

<<insert departmen employees, agents Company [without whom such data r necessary to prote concerned, and suc out in Part 6.2 of thi

- 24.3 Equal opportunities processed to the discrimination in I recruitment, promo terms and conditi determined on the productivity.
- 24.4 Employee data sub keep equal opportu be made in writing contact details>>.

25. Health Records

- 25.1 The Company hold used to assess th highlight any issues Company places a workplace, on prom on the grounds of d data on employees (see Part 2 of this P data subjects' healt in accordance with data, as set out in will be collected. subject's express d employees' health d data (as listed unde
- 25.2 Health records sha and/or position(s)>: contractors, or othe express consent of except in exception interests of the emp satisfy one or more
- 25.3 Health records wil required to ensure legally, safely, and
- 25.4 Employee data sub keep health record and addressed to <



and shall not be revealed to other parties working on behalf of the the employee data subject(s) to ptional circumstances where it is of the employee data subject(s) one or more of the conditions set

will only be collected, held, and vent, reduce, and stop unlawful Act 2010, and to ensure that nent, assessment, benefits, pay, edundancy, and dismissals are lifications, experience, skills, and

quest that the Company does not tion about them. All requests must ert name(s) and/or position(s) and

employee data subjects which are d welfare of employees and to her investigation. In particular, the taining health and safety in the , and on preventing discrimination conditions. In most cases, health definition of special category data y and all data relating to employee ected, held, and processed strictly essing special category personal to special category personal data out the relevant employee data pany's lawful basis for processing sis for processing special category

d only by <<insert department(s) aled to other employees, agents, half of the Company [without the ect(s) to whom such data relates], it is necessary to protect the vital ncerned, and such circumstances in Part 6.2 of this Policy.

d, and processed to the extent e to perform their work correctly, impediments or discrimination.

quest that the Company does not equests must be made in writing osition(s) and contact details>>.

26. Benefits

- 26.1 In cases where employed are provided by the party organisations subjects.
- 26.2 Prior to the collec informed of the pe collection, and the requirements set ou
- 26.3 The Company sha necessary in the ad
- 26.4 The following sche schemes may be at
 - a) <<Insert na please conta organisation and process
 - i) <<ins
 - ii) <<ad
 - b) [<<Add furth

27. [Trade Unions

- 27.1 The Company will employee data sub recognised by the 0 trade union membe data (see Part 4 o employee data subj held, and processe special category pe category personal relevant employee lawful basis for pro <<insert lawful basis 6.2)>>.] The following
 - 27.1.1 Name;
 - 27.1.2 Job descript
 - 27.1.3 <<insert type
 - 27.1.4 <<add furthe
- 27.2 All employee datas not supply their pe right before any suc

28. Employee Monitoring

28.1 The Company may subjects. Such mor

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enrolled in benefit schemes which cessary from time to time for third ta from relevant employee data

loyee data subjects will be fully be collected, the reasons for its processed, as per the information

rsonal data except insofar as is nt benefits schemes.

ployees. Please note that not all

eme>>. For further information, (s), position(s), and/or third-party sonal data may be collected, held,

and its purpose>>;

d>>.

>.]

ersonal data concerning relevant a unions where those unions are , information about an individual's PR's definition of special category ion). Any and all data relating to ership, therefore, will be collected, with the conditions for processing Part 6.2 of this Policy. [No special held, or processed without the consent.] **OR** [The Company's y data relating to trade unions is category data (as listed under Part and supplied:

purpose>>;

b request that the Company does ons and shall be informed of that

or the activities of employee data will not necessarily be limited to,

internet and email take place (unless criminal activity or employee data subj in advance.

- 28.2 Monitoring should r interfere with an em
- 28.3 Monitoring will only achieve the benefit any such monitorin directly related to (a times, in accordanc obligations under th
- 28.4 The Company sha employee data sub circumstances will subject's normal p subject in question but not limited to, 0 network ("VPN") set

29. Data Security - Transferri

The Company shall ensure communications and other

- 29.1 All emails containi <<insert type(s) of e
- 29.2 All emails containing
- 29.3 Employee persona transmission over u
- 29.4 Employee personal there is a wired alte
- 29.5 Employee personal received, should be The email itself sh should also be dele
- 29.6 Where employee p recipient should be waiting by the fax m
- 29.7 Where employee per be passed directly type(s) of delivery s
- 29.8 All employee perso form or on remova container marked "o
- 29.9 [<<Add further secu

that monitoring of any kind is to ces, such as the investigation of verity, justify covert monitoring), the exact nature of the monitoring

ircumstances justify it, as above)

y considers that it is necessary to e. Personal data collected during held, and processed for reasons ving the intended result and, at all ubjects' rights and the Company's

no unnecessary intrusion upon cations or activities, and under no outside of an employee data ours, unless the employee data pment or other facilities including, npany intranet, or a virtual private npany for employee use.

communications

sures are taken with respect to all yee personal data:

data must be encrypted [using

a must be marked "confidential";

tted over secure networks only; permitted in any circumstances;

mitted over a wireless network if practicable;

ody of an email, whether sent or of that email and stored securely. porary files associated therewith od of deletion>>];

ent by facsimile transmission the f the transmission and should be a;

sferred in hardcopy form it should t using <<insert name(s) and/or

d physically, whether in hardcopy hall be transferred in a suitable

d>>.]

30. Data Security - Storage

The Company shall ensure storage of employee perso

- 30.1 All electronic copie using passwords ar
- 30.2 All hardcopies of e stored on physical, box, drawer, cabine
- 30.3 All employee persol interval>> with back be encrypted [using
- 30.4 No employee perso but not limited to, belongs to the Con <<insert name(s) ar such approval, str described at the t absolutely necessar
- 30.5 No employee perso belonging to an em of the Company a devices belonging t the Company where letter and spirit of limited to the GDPF all suitable technica
- 30.6 [<<Add further secu

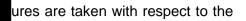
31. Data Security - Disposal

When any employee perso reason (including where co be securely deleted and disposal of personal data, p

32. Data Security - Use of Pe

The Company shall ensure use of employee personal of

- 32.1 No employee perso agent, contractor, c access to any emp to, such access sh position(s) and cont
- 32.2 No employee pers contractor, or other Company or not, position(s) and cont
- 32.3 Employee personal



data should be stored securely cryption>>] data encryption;

along with any electronic copies d be stored securely in a locked

ally should be backed up <<insert **D/OR [**offsite]. All backups should (ption>>];

d on any mobile device (including, artphones), whether such device out the formal written approval of tact details>> and, in the event of n all instructions and limitations ven, and for no longer than is

sferred to any device personally r, or other party working on behalf data may only be transferred to other parties working on behalf of as agreed to comply fully with the Protection Law, including but not emonstrating to the Company that sures have been taken);

d>>.]

l or otherwise disposed of for any d are no longer needed), it should information on the deletion and any's Data Retention Policy.

ures are taken with respect to the

d informally and if an employee, behalf of the Company requires they do not already have access ted from <<insert name(s) and/or

sferred to any employee, agent, rties are working on behalf of the on of <<insert name(s) and/or

th care at all times and should not

be left unattended or other parties at a

- 32.4 If employee persor computer in questic must lock the comp
- 32.5 [Where employee purposes, it shall be appropriate conser opted out, whether
- 32.6 [<<Add further secu

33. Data Security - IT Securit

The Company shall ensure and information security:

- 33.1 All passwords used regularly and should otherwise compror uppercase and low by the Company is of
- 33.2 Under no circumsta between any empl behalf of the Comp is forgotten, it must access to password
- 33.3 All software (includi shall be kept up-to installing any and period>> after the manufacturer] OR there are valid tech
- 33.4 No software may t without the prior ap
- 33.5 [<<Add further secu

34. Organisational Measures

The Company shall ensure collection, holding, and pro

- 34.1 All employees, age Company shall be r the Company's res Policy, and shall be
- 34.2 Only employees, as Company that need carry out their as personal data held I
- 34.3 All sharing of emprovided to the rele

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d employees, agents, contractors,

on a computer screen and the d for any period of time, the user aving it;

e Company is used for marketing nsert position>> to ensure that the no employee data subjects have y service such as the TPS;]

d>>.]

sures are taken with respect to IT

ersonal data should be changed ses that can be easily guessed or must contain a combination of and symbols. [All software used passwords.];

vords be written down or shared ors, or other parties working on prity or department. If a password cable method. IT staff do not have

plications and operating systems) IT staff shall be responsible for dates [not more than <<insert available by the publisher or and practically possible] [, unless];

npany-owned computer or device artment or position>>;

d>>.]

ures are taken with respect to the sonal data:

r parties working on behalf of the their individual responsibilities and Protection Law and under this his Policy;

er parties working on behalf of the mployee personal data in order to shall have access to employee

hall comply with the information jects and, if required, the consent

of such data subjec data;

- 34.4 All employees, age Company handling so;
- 34.5 All employees, age Company handling
- 34.6 All employees, age Company handling to exercise care, ca that relate to emplo
- 34.7 Methods of collection be regularly evaluat
- 34.8 All employee pers periodically, as set
- 34.9 The performance of working on behalf of regularly evaluated
- 34.10 All employees, age Company handling accordance with th contract;
- 34.11 All agents, contrac handling employee employees who are held to the same of arising out of this Po
- 34.12 Where any agent, c handling employee that party shall inde liability, damages, failure;
- 34.13 [<<Add further orga

35. Sharing Personal Data

- 35.1 The Company may specific safeguards
- 35.2 Employee personal contractors, or othe has a legitimate, jot be shared with a th the provisions of Pa
- 35.3 Where a third-part personal data on I written instruction o
- 35.4 Employee personal circumstances:

or to the sharing of their personal

r parties working on behalf of the will be appropriately trained to do

r parties working on behalf of the will be appropriately supervised;

r parties working on behalf of the shall be required and encouraged in discussing work-related matters er in the workplace or otherwise;

ing employee personal data shall

e Company shall be reviewed a Retention Policy;

ents, contractors, or other parties employee personal data shall be

r parties working on behalf of the ata will be bound to do so in rotection Law and this Policy by

orking on behalf of the Company insure that any and all of their ng of employee personal data are vant employees of the Company Law;

working on behalf of the Company neir obligations under this Policy, s the Company against any costs, ngs which may arise out of that

equired>>.]

personal data with third parties if

ed with other employees, agents, alf of the Company if the recipient any employee personal data is to of the European Economic Area, oply.

ed, that processor shall process (as data controller) only on the

d with third parties in the following

- a) the third pai purpose of p
- b) the sharing the privacy r Part 15 fo concerned h
- c) the third-par security sta adequate se
- (where appli d) restrictions (
- a fully exec e) party clause

Transferring Personal Da 36.

- The Company ma 36.1 available remotely)
- The transfer of emp 36.2 take place only if or
 - the transfer a) that country Commission for personal
 - b) the transfer provides ap agreement rules: stand Commission by a supervi certification for in the G competent administrativ authorised b
 - c) the transfer relevant em
 - d) the transfer employee da taken at the
 - e) the transfer
 - the transfer f)
 - the transfer g) data subject physically or
 - the transfer h) intended to

d to know the information for the Company under a contract;

al data concerned complies with cted employee data subjects (see hd, if required, the employees aring of their personal data;

to comply with all applicable data ocedures, and has put in place t the employee personal data;

lies with any cross-border transfer

containing GDPR-approved third vith the third-party recipient.

the EEA

nsfer ('transfer' includes making to countries outside of the EEA.

a country outside of the EEA shall g applies:

or one or more specific sectors in rganisation), that the European s an adequate level of protection

international organisation) which the form of a legally binding es or bodies; binding corporate uses adopted by the European proved code of conduct approved formation Commissioner's Office); ification mechanism (as provided es agreed and authorised by the or provisions inserted into

en public authorities or bodies ory authority:

med and explicit consent of the

rmance of a contract between the pany (or for pre-contractual steps data subject);

t public interest reasons;

uct of legal claims;

he vital interests of the employee ere the employee data subject is eir consent: or

er that, under UK or EU law, is he public and which is open for











access by the show a legiti

37. Data Breach Notification

- 37.1 All personal data reported immediate
- 37.2 If an employee, as Company becomes occurred, they mus evidence relating to retained.
- 37.3 If a personal data b the rights and freed of confidentiality, o social or economic Information Commi and in any event, w
- 37.4 In the event that a p a higher risk than th employee data sub affected employee without undue delay
- 37.5 Data breach notifica
 - a) The categor
 - b) The categor concerned;
 - c) The name a (or other cor
 - d) The likely co
 - e) Details of t Company t measures to

38. Implementation of Policy

This Policy shall be deem shall have retroactive effect this date.

This Policy has been approved an

Name:	< <insert< th=""></insert<>
Position:	< <insert< th=""></insert<>
Date:	< <insert< th=""></insert<>
Due for Review by:	< <insert< th=""></insert<>

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S





therwise to those who are able to g the register.

mployee personal data must be Protection Officer.

r party working on behalf of the that a personal data breach has igate it themselves. Any and all ch in question should be carefully

reach is likely to result in a risk to ubjects (e.g. financial loss, breach hal damage, or other significant ction Officer must ensure that the ned of the breach without delay, g become aware of it.

kely to result in a high risk (that is, 37.3) to the rights and freedoms of ion Officer must ensure that all med of the breach directly and

llowing information:

ber of data subjects concerned;

umber of personal data records

Company's data protection officer formation can be obtained);

:h;

proposed to be taken, by the including, where appropriate, erse effects.

ert date>>. No part of this Policy ity to matters occurring on or after Signature:

