

secureVirtual Employee Privacy Policy

Version: 1.3 **Date of last update:** 11th January 2019

How your Personal Information will be used

1. As your employer, the Company needs to keep and process information about you for normal employment purposes. The information we hold and process will be used for our management and administrative use only. We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately. This includes during the recruitment process, whilst you are working for us, at the time when your employment ends and after you have left. It also includes using information to enable us to comply with the employment contract, to comply with any legal requirements, pursue the legitimate interests of the Company and protect our legal position in the event of legal proceedings. If you do not provide this data, we may be unable in some circumstances to comply with our obligations and we will tell you about the implications of that decision.
2. As a company providing managed hosting and IT Managed Services to Customers, we may sometimes need to process your data to pursue our legitimate business interests, for example to prevent fraud, for administrative purposes, or reporting potential crimes. The nature of our legitimate interests are, but not limited to:
 - a. Staff administration (including payroll and pensions)
 - b. Education, training and development
 - c. Information and database administration
 - d. Business management and planning
 - e. Accounting and auditing
 - f. Criminal prosecution and prevention
 - g. Health administration and services
 - h. National fraud initiatives

We will never process your data where these interests are overridden by your own interests, unless this would be illegal or fraudulent.

3. Much of the information we hold will have been provided by you, but some may come from other internal sources, such as your manager, or in some cases, external sources, such as referees.
4. The sort of information we hold includes such information as, your application form and references, your contract of employment and any amendments to it; correspondence with or about you (for example letters to you about a pay rise or, at your request, a letter to your mortgage company confirming your salary); information needed for payroll, benefits and expenses purposes; contact and emergency contact details; records of holiday, sickness and other absence; information needed for equal opportunities monitoring policy; and records relating to your career history (such as training records, appraisals, other performance measures and, where appropriate, disciplinary and grievance records); a photographic copy of your current driver's license and/or passport; bank Account, salary/wages information; pension, tax and national Insurance details; professional membership registrations and qualifications, education and training history; recruitment and employment checks (i.e. references, proof of ID, right to work in the UK, etc.)

5. You will, of course, inevitably be referred to in many company documents and records that are produced by you and your colleagues in the course of carrying out your duties and the business of the company.
6. Where necessary, we may keep information relating to your health, which could include reasons for absence and GP reports and notes. This information will be used in order to comply with our health and safety and occupational health obligations – to consider how your health affects your ability to do your job and whether any adjustments to your job might be appropriate. We will also need this data to administer and manage statutory and company sick pay, company health insurance policies you are subscribed to, the company pension scheme, and other similar benefits.
7. Where we process special categories of information relating to your racial or ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, biometric data or sexual orientation, we will always obtain your explicit consent to those activities unless this is not required by law or the information is required to protect your health in an emergency. Where we are processing data based on your consent, you have the right to withdraw that consent at any time.
8. In addition, we may monitor computer and telephone/mobile telephone use.
9. We have also set you up with an email address through our own email system together with log in details for our HR management system (BambooHR) where you can access and edit your personal information.

Our service providers may only process the data of our employees for the purpose of providing us with their services, and no other purpose.

Details of your name and the company for which you work are shared via our HR management system with employees of other Internet Corp affiliated companies.

We may also share certain parts of this data with other Internet Corp affiliated companies, our external financial and legal professional advisors.

We may also be required to share certain personal data with specific regulatory authorities as requested or required by law, e.g. HMRC.

10. Other than as mentioned herein, we will only disclose information about you to third parties if we are legally obliged to do so or where we need to comply with our contractual duties to you, for instance we may need to pass on certain information to our external payroll provider, pension or health insurance schemes, recruitment or human resources consultant/provider. . .
11. We may transfer information about you to other group companies for purposes connected with your employment or the management of the company's business.
12. Your personal data will be stored for a period of 6 years, to comply with employment laws.
13. We may also process and share your personal data with relevant third parties should we sell all or the relevant portion of our business or assets (including as part of any restructuring or insolvency procedure).

14. If, in the future, we intend to process your personal data for a purpose other than that which it was collected we will provide you with information on that purpose and any other relevant information.

Information received from third parties and the source of that data

We may also process personal data received from the following third parties:

A. Private Sources

Former employers, educational institutions, companies and individuals who sell their businesses to us and persons who have given references for you to us. The categories of data concerned here include previous work history, educational history and performance history.

Benefit providers (if any) e.g. car leasing companies, health insurers and pension providers. The categories of data concerned here include identifying information and benefit details.

B. Public Sources

Online e.g. where you have published online, such as LinkedIn, or any other publicly available social media profile, or such published information. The categories of data concerned will be limited to any such information as individuals will have posted themselves, on their public profiles, and therefore available for anyone to view.

Transfer of data outside the European Economic Area

We transfer data for human resources purposes to the software platform BambooHR located in the United States. The safeguard we have put in place for this transfer is to enter into European Commission approved standard contract clauses with the service provider. BambooHR are also certified under the EU-U.S. Privacy Shield.

Your rights

1. Under the General Data Protection Regulation (GDPR) and The Data Protection Act 2018 (DPA 18) you have a number of rights with regard to your personal data. You have the right to request from us access to and rectification or erasure of your personal data, the right to restrict processing, object to processing as well as in certain circumstances the right to data portability.
2. If you have provided consent for the processing of your data you have the right (in certain circumstances) to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn.
3. You have the right to lodge a complaint to the Information Commissioners' Office if you believe that we have not complied with the requirements of the GDPR or DPA 18 with regard to your personal data.

Identity and contact details of the Data Controller

secureVirtual Ltd is the controller, and processor, of data for the purposes of the DPA 18 and GDPR.

If you have any concerns as to how your data is processed you can contact the sV HR team in person, or you can write to them via email at hr@securevirtual.com or via letter at, 70 Hill St, Richmond upon Thames, London TW9 1TW.