

MANE CONTRACT SERVICES LIMITED

The purpose of this privacy notice

Mane Contract Services Limited (**'Mane'**) is committed to protecting the privacy and security of your personal information (referred to as **personal data**) and is required by data protection law, in particular, the UK General Data Protection Regulation (**UK GDPR**), to provide you with this privacy notice.

This notice applies to current and former employees, workers and contractors. It does not form part of any contract of employment, contract of service or contract to provide services.

Read and retain this notice so that you understand how we collect, store and use your personal data during and after your working relationship with us and so that you are aware of your rights under data protection law. A copy of the notice is also available from the HR Department.

We may update this notice at any time. If we do, we will provide you with an updated copy, summarising the changes where relevant. We may also notify you in other ways from time to time about the processing of your personal data.

Who we collect your personal data from

We collect personal data about employees, workers and contractors through our recruitment processes, either directly from candidates or sometimes from third parties such as recruitment agencies, headhunters, background check providers and referees.

We may sometimes collect additional data from third parties including former employers, credit reference agencies and HMRC.

We may also collect personal data from the trustees or managers of pension arrangements operated by us.

We will collect additional personal data during the course of your work for us. Where necessary, we will provide a further privacy notice to you about the source of that data and what we are doing with it.

The types of personal data we hold about you

Personal data means any information about an individual from which that person can be identified. It does not include information from which the person's identity has been removed (anonymous data).

There are certain types of personal data that reveal more sensitive personal details, such as health information or criminal convictions. Special category data and criminal offence data are treated with additional care and are addressed separately in this notice.

If any of the following information changes, contact the HR Department so that we can ensure that all the information we hold about you is accurate and up to date.

We **will** collect, store and use the following categories of **personal data** about you:

- **Identity data:** first name, last name, any previous names, marital status, title, date of birth and gender.
- **Contact data:** addresses, telephone numbers, personal email addresses and emergency contact information.
- **Family data:** dependants and next of kin.
- **Recruitment data:** copies of right to work documentation, copy passport or other photo ID, copy proof of address documentation (for example, bank statement or utility bill), copy driving licence, references and information included in a CV or cover letter or as part of the application process.
- **Employment status check data:** results of HMRC employment status check and details of your interest in and connection with the intermediary through which your services are supplied.
- **Financial and tax data:** National Insurance number, bank account details, payroll records and tax status information, salary, pension and benefits information, compensation history and conflict of interest or gift declarations.
- **Employment data:** start date (and, if different, start date of continuous employment), location of employment or workplace, leaving date and reason for leaving, employment records (including contracts, photographs, job titles, work history, working hours, working arrangements (office-based, hybrid, remote), holidays and other types of leave, training records and professional memberships), performance information and disciplinary and grievance information.
- **Monitoring data:** CCTV footage, information obtained through electronic means (for example, swipe card records) and information about your use of our information and communications systems.

We **may** collect, store and use the following **special category data**:

- **Race, religion, beliefs and sexual orientation:** information about your race or ethnicity, religious or philosophical beliefs, sexual orientation and political opinions.
- **Trade union membership.**
- **Health and medical:** information about and connected with your health, any medical condition or disability, including:
 - sickness absence records;
 - accident at work records;
 - tailored adjustment records; and
 - correspondence with and information provided to and received from our occupational health service and other medical health professionals.
- **Genetic and biometric data:** information which includes genetic or biometric data.

We **may** collect, store and use **criminal offence data** about you. This is information about criminal convictions and offences, including information relating to the alleged commission of offences, proceedings for an offence committed (or alleged to have been committed) and the disposal of those proceedings, including sentencing.

How we use your personal data

We will only use your personal data when we have a lawful basis to do so. Our lawful basis for each purpose for which we use your personal data is set out below. Most commonly, we will use your personal data in reliance on:

- **Contract performance.** Where we need to process your personal data to perform the contract we have entered into with you.
- **Legitimate interests.** Where we need to use your personal data for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. We consider any potential impact on you and your rights when determining whether we can process your personal data for our legitimate interests.
- **Recognised legitimate interests.** We may sometimes use your personal data because we (or a third party) have a recognised legitimate interest (RLIs). These are different to legitimate interests. RLIs apply where there are public interest reasons for processing (such as preventing or detecting crime, safeguarding individuals, responding to emergencies, supporting national or public security or defence, or sharing information with public bodies when they confirm it is necessary for their official functions). RLIs are legally recognised within data protection law. Where we rely on an RLI, we will ensure the use is strictly necessary and only use or share the minimum data required.
- **Legal obligation.** Where we need to use your personal data to comply with a legal or regulatory obligation.
- Less commonly, we may need to process your personal data in emergency situations when it is in your **vital interests** or those of another person.

This section explains how we may use your personal data for a new purpose, and the steps we implement before doing so.

- **Using data for new purposes.** Before we use your personal data for any new purpose, we will ensure the processing is fair and lawful. In particular, we will confirm that an appropriate lawful basis applies to the new purpose and (where relevant) that any additional requirements for special category data or criminal offence data are met. We will carefully consider whether any new use is compatible with the original purpose for which your data was collected. In making that assessment, we take into account a number of factors, including:
 - How closely connected the new purpose is to the original one.
 - The context in which your data was collected, including your reasonable expectations at the time.
 - The nature and sensitivity of the data involved.
 - The potential impact on you.
 - The safeguards we have in place to protect your data.

We will not use your personal data in ways that are unexpected, unfair, or that could have an unjustified negative impact on you.

In certain circumstances, the law treats further processing as compatible without requiring a full compatibility assessment, for example, where processing is carried out for archiving in the public

interest, scientific or historical research, or statistical purposes, provided appropriate safeguards are in place.

Where we do intend to use your data for a new purpose, we will inform you and provide any relevant information before doing so. In some cases, you will have the right to object to that use, and we will make you aware of this right whenever it applies.

Starting work

Purpose/Use	Type of data	Lawful basis
HR records: setting up your record in the HR Department	Identity data Contact data Family data Recruitment data Employment status check data Financial and tax data Employment data Monitoring data	Contract performance Legal obligation Our legitimate interests which are to administer employment, maintain accurate personnel records, manage the employment relationship, ensure effective workforce planning and comply with internal business processes. [IDENTIFY] Vital interests
Right to work: confirming entitlement to work in the UK	Identity data Contact data	Contract performance Legal obligation
Employment status: determining whether your engagement is deemed employment for the purposes of Chapter 10 of Part 2 of the Income Tax (Earnings and Pensions) Act 2003 and providing you with a status determination statement in accordance with the applicable provisions of that Act	Identity data Employment status check data Financial and tax data Employment data	Contract performance Legal obligation Third party legitimate interests of Clients' in receiving an accurate employment status determination to enable them to comply with their tax obligations.

Managing your contractual entitlements (pay, pensions, other benefits and leave)

Purpose/Use	Type of data	Lawful basis
Pay: paying you and, where required, deducting tax and National Insurance contributions (NICs)	Identity data Contact data Employment status check data Financial and tax data Employment data	Contract performance Legal obligation
Salary and compensation: making decisions in salary reviews and in relation to other forms of compensation including commission	Identity data Contact data Financial and tax data Employment data	Contract performance Our legitimate interests which are to attract, motivate and retain employees, reward performance and ensure fair and consistent remuneration practices.
Pension enrolment: enrolling you in a pension arrangement in accordance with our statutory automatic enrolment duties	Identity data Contact data Financial and tax data Employment data	Contract performance Legal obligation
Pension arrangements: liaising with the trustees or managers of any pension scheme operated by us OR your pension provider	Identity data Contact data Financial and tax data Employment data	Contract performance Legal obligation Third party legitimate interests of Pension providers' and scheme trustees' legitimate interests in administering pension schemes and complying with pension legislation.

Benefits: providing and administering the following benefits to you including, where necessary, liaising with the benefit providers: - Alltogether - Bupa - Legal and General	Identity data Contact data Family data Employment status check data Financial and tax data Employment data	Contract performance Legal obligation Our legitimate interests which are To provide and administer employee benefits, promote employee wellbeing and support recruitment and retention. Third party legitimate interests of Benefit providers in administering insurance, healthcare, life assurance and other employee benefit schemes.
Annual leave: administering your annual leave entitlement and your entitlement to any other forms of leave whether provided by law or under the terms of your contract with us	Identity data Contact data Family data Financial and tax data Employment data	Contract performance Legal obligation

Managing our working relationship with you

Purpose/Use	Type of data	Lawful basis
Contract, policies and procedures: administering the contract we have entered into with you and the policies and procedures set out in our staff handbook as they apply to you from time to time	Identity data Contact data Family data Employment data	Contract performance Legal obligation
Qualifications and skills: assessing qualifications and skills for a particular job or task, including decisions about promotions	Identity data Contact data Recruitment data Financial and tax data Employment data	Contract performance Legal obligation Our legitimate interests which are to ensure employees have the necessary skills and qualifications, allocate work appropriately and

		support career development. Third party legitimate interests of training providers, awarding bodies and clients' legitimate interests in verifying qualifications and ensuring suitably qualified personnel perform work.
Education, training and development requirements	Identity data Employment data	Contract performance Legal obligation Our legitimate interests which are to improve employee skills, support career progression and meet business requirements.
Performance: conducting performance reviews, managing performance and determining performance requirements	Identity data Contact data Recruitment data Employment status check data Employment data Monitoring data	Contract performance
Grievance and disciplinary: investigating and conducting proceedings in relation to grievance or disciplinary issues raised by or concerning you	Identity data Contact data Recruitment data Employment status check data Employment data Monitoring data	Contract performance Legal obligation
Working arrangements: making decisions about your working arrangements and your continued employment or engagement	Identity data Contact data Family data Recruitment data	Contract performance Legal obligation Our legitimate interests which are

	Employment status check data Financial and tax data Employment data Monitoring data	to manage staffing levels, allocate work efficiently, ensure operational effectiveness and meet client requirements. Third party legitimate interests of clients' in receiving appropriately qualified personnel to deliver services.
Termination: making arrangements for the termination of our working relationship	Identity data Contact data Employment status check data Financial and tax data Employment data	Contract performance Legal obligation Our legitimate interests which are To manage the orderly termination of employment, protect confidential information, recover company property and maintain employment records. Third party legitimate interests of legal advisers, pension providers and benefit providers' legitimate interests in concluding employment arrangements and administering ongoing obligations.
Legal disputes: dealing with any legal disputes we have with you	Identity data Contact data Family data	Legal obligation Our legitimate interests which are to establish,

	Recruitment data Employment status check data Financial and tax data Employment data Monitoring data	exercise or defend any legal claims. Third party legitimate interests of legal advisors, insurers and courts' legitimate interests in resolving legal proceedings and claims.
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Monitoring

Purpose/Use	Type of data	Lawful basis
Network and information security: ensuring network and information security, including prevention of unauthorised access to our computer and electronic communications systems and prevention of malicious software distribution	Employment data Monitoring data	Contract performance Legal obligation Our legitimate interests which are to protect company systems, data and confidential information, prevent cyber-attacks and maintain business continuity. Third party legitimate interests of IT service providers' in maintaining secure systems and providing technical support.
Communication systems: monitoring use of our information and communication systems to ensure compliance with our IT policies	Identity data Contact data Family data Recruitment data Employment status check data Financial and tax data Employment data Monitoring data	Contract performance Legal obligation Our legitimate interests which are to ensure compliance with company policies, protect confidential information, investigate misconduct and maintain system security. Third party legitimate interests of IT providers' in supporting

		and securing communication systems.
Physical access: monitoring and controlling access to office premises	Identity data Employment data Monitoring data	Contract performance Legal obligation Our legitimate interests which are to ensure the safety and security of our premises. Third party legitimate interests of building management and security providers' in maintaining secure premises.

Wider workforce management

Purpose/Use	Type of data	Lawful basis
Business management and planning: including managing our workforce, financial planning, budgeting, resource allocation, accounting, auditing and business reporting	Identity data Contact data Family data Recruitment data Employment status check data Financial and tax data Employment data Monitoring data	Contract performance Legal obligation Our legitimate interests which are to manage our business operations, financial performance, workforce planning, budgeting, auditing and strategic planning. Third party legitimate interests of professional advisors, auditors and accountants' in providing professional services.
Reorganisations, sales, mergers and acquisitions	Identity data Contact data	Contract performance Legal obligation

	Family data Recruitment data Employment status check data Financial and tax data Employment data Monitoring data	Our legitimate interests which are to evaluate, manage and implement corporate transactions and ensure business continuity. Third party legitimate interests of potential purchasers, investors, lenders and professional advisers' legitimate interests in conducting due diligence and assessing commercial risks.
Data analytics: conducting data analytics studies to review and better understand employee retention and attrition rates	Identity data Contact data Family data Recruitment data Employment status check data Financial and tax data Employment data Monitoring data	Contract performance Legal obligation Our legitimate interests which are to analyse workforce trends, improve employee retention, workforce planning and operational efficiency.
Equal opportunities monitoring	Identity data Family data Recruitment data Employment status check data Financial and tax data] Employment data Monitoring data	Contract performance Legal obligation Our legitimate interests which are to monitor equality, diversity and inclusion, identify trends and ensure fair employment practices.
Health and safety: compliance with health and safety obligations	Identity data Contact data Family data Recruitment data	Contract performance Legal obligation Vital interests

	Employment status check data Financial and tax data Employment data Monitoring data	
Workplace incidents: dealing with workplace accidents and emergencies	Identity data Contact data Family data Monitoring data	Contract performance Legal obligation Vital interests
Fraud or crime prevention	Identity data Contact data Family data Recruitment data Employment status check data Financial and tax data Employment data Monitoring data	Contract performance Legal obligation Our legitimate interests which are to prevent fraud, theft, unauthorised access and other unlawful activity, and to protect our employees, clients and business. Third party legitimate interests of law enforcement agencies, insurers and fraud prevention organisations' legitimate interests in preventing, detecting and investigating criminal activity.
Legal disputes: dealing with legal disputes involving other employees, workers and contractors or clients, customers and suppliers	Identity data Contact data Family data Recruitment data Employment status check data Financial and tax data Employment data Monitoring data	Legal obligation Our legitimate interests which are to establish, exercise or defend any legal claims. Third party legitimate interests of legal advisors, insurers, courts and regulators' legitimate interests in resolving disputes and

		complying with legal proceedings.
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How we use your special category data

We only use your special category data when, in addition to having a lawful basis that is required to process personal data (referred to previously in this notice), there is an additional ground that permits us to do so. Those additional grounds include:

- **Employment law.** When using your special category data is necessary for carrying out rights and obligations in connection with employment law.
- **Legal claims.** When using your special category data is necessary for establishing, exercising or defending legal claims.
- **Substantial public interest.** When using your special category data is necessary to undertake matters deemed to be of substantial public interest. These include equal opportunities monitoring, preventing or detecting unlawful acts, protecting the public against dishonesty, [compliance with regulatory requirements in relation to unlawful acts,] provision of confidential counselling and in relation to our occupational pension scheme.
- **Assessment of working capacity.** When using your special category data is necessary for the assessment of your working capacity by a health professional.
- **Vital interests (incapacity).** When using your special category data is necessary to protect your vital interests, or someone else's vital interests, in circumstances in which you may be physically or legally incapable of giving consent.

Race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions

Purpose/Use	Lawful basis	Additional ground
Equal opportunities monitoring	Contract performance Legal obligation Our legitimate interests which are to monitor equality, diversity and inclusion, identify and address potential discrimination, improve workplace practices and promote an inclusive workforce.	Employment law Substantial public interest
Equalities reporting	Contract performance Legal obligation Our legitimate interests which are to analyse workforce diversity,	Employment law Substantial public interest

	identify trends, improve recruitment and employment practices and demonstrate our commitment to equality, diversity and inclusion. Third party legitimate interests of regulators, clients or accreditation bodies' in receiving anonymised or aggregated equality information where appropriate.	
Disciplinary and grievances issues	Contract performance Legal obligation Our legitimate interests which are to investigate complaints fairly, protect employees and the business, maintain workplace standards and resolve workplace disputes. Third party legitimate interests of external HR consultants, legal advisers or investigators' in assisting with investigations where instructed.	Employment law Legal claims
Legal disputes	Contract performance Legal obligation Our legitimate interests which are to establish, exercise or defend any legal claims. Third party legitimate interests of legal advisers, insurers, courts and regulators' legitimate interests in resolving	Employment law Legal claims

	legal proceedings and disputes.	
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Health and medical information

Purpose/Use	Lawful basis	Additional ground
Assessment of fitness to work	Contract performance Legal obligation Vital interests	Employment law Assessment of working capacity
Sickness absence management	Contract performance Legal obligation Vital interests	Employment law Assessment of working capacity
In relation to reasonable adjustments	Contract performance Legal obligation Our legitimate interests which are to support disabled employees, remove workplace barriers and enable employees to perform their roles effectively. Third party legitimate interests of occupational health providers and workplace assessment providers' in recommending and implementing appropriate adjustments.	Employment law Assessment of working capacity
Benefit administration: to administer benefits relating to your health, medical condition or disability including contractual and statutory sick pay [and private health insurance]	Contract performance Legal obligation	Employment law
Health and safety: to ensure health and safety at work	Contract performance Legal obligation	Employment law

	Recognised legitimate interests which are to protect the health, safety and welfare of employees, visitors and others affected by our activities. Vital interests Third party legitimate interests of occupational health providers, emergency services and health and safety consultants' legitimate interests in maintaining workplace safety.	
Well-being: to protect your physical, mental or emotional well-being or that of another person	Contract performance Legal obligation Vital interests Our legitimate interests which are to support employee wellbeing, reduce workplace risks and promote a healthy working environment. Third party legitimate interests of Employee Assistance Programme providers, occupational health providers and wellbeing providers' legitimate interests in delivering wellbeing services.	Employment law Assessment of working capacity
Health-related departures: if you leave employment for health-related reasons, to make any applications for pensions, and permanent health insurance purposes	Contract performance Legal obligation Our legitimate interests which are to manage employment termination arising from	Employment law Assessment of working capacity

	ill health and administer any associated benefits or insurance claims. Third party legitimate interests of pension providers, insurers and occupational health providers' in assessing eligibility for benefits.	
Ill-health pension entitlement: to determine any entitlement to an ill-health pension under a pension arrangement operated by us.	Contract performance Legal obligation Vital interests	Employment law Assessment of working capacity
Pension entitlement: to determine any entitlement under any share plan operated by us where your reason for leaving is determined to be ill health, injury or disability.	Contract performance Legal obligation Our legitimate interests which are to administer contractual remuneration and incentive arrangements fairly. Third party legitimate interests of pension providers, trustees and share plan administrators' in determining entitlement.	Employment law Assessment of working capacity
Disciplinary and grievances issues	Contract performance Legal obligation Our legitimate interests which are to investigate matters fairly, ensure compliance with our policies and protect employees and the business. Third party legitimate interests of occupational health	Employment law Legal claims Assessment of working capacity

	providers or medical advisers' in providing independent medical advice where relevant.	
Legal disputes	Contract performance Legal obligation Our legitimate interests which are to establish, exercise or defend legal claims. Third party legitimate interests of legal advisors, insurers, occupational health providers, courts and regulators' legitimate interests in resolving legal proceedings.	Employment law Legal claims Assessment of working capacity

How we use your criminal offence data

You will have been given information about whether any criminal records checks were required for your role when you applied to work for us. If any further checks are required, for example, due to a change in the law or a change in your role, we will advise you.

We only use your criminal offence data when, in addition to one of the grounds that is required to process personal data (referred to previously in this notice), there is a further ground that permits us to do so. The further grounds on which we may make use of criminal offence data include:

- **Employment.** When processing criminal offence data is necessary to perform or exercise obligations or rights which are imposed or conferred by law either on us or on you in connection with employment.
- **Legal rights.** When processing criminal offence data is necessary for the purpose of, or in connection with, any legal proceedings (including prospective legal proceedings), for the purpose of obtaining legal advice, or is otherwise necessary for the purposes of establishing, exercising or defending legal rights.
- **Deemed substantial public interest.** When processing criminal offence data is deemed to be of substantial public interest because it concerns preventing or detecting unlawful acts, or protecting the public against dishonesty or because it concerns compliance with regulatory requirements in relation to unlawful acts.

Purpose/Use	Lawful basis	Additional ground
Necessary for your role	Contract performance Legal obligation Our legitimate interests which are to ensure	Employment Deemed substantial public interest

	employees are suitable for roles where criminal records checks are required, protect our clients, employees and business, and comply with contractual and regulatory requirements. Third party legitimate interests of clients' in ensuring that workers supplied to them meet their safeguarding, security or regulatory requirements. Disclosure and Barring Service (where applicable) in administering criminal records checks.	
Criminal offences during employment: where criminal offence data is brought to our attention during the course of your work for us (for example, if you are charged with a criminal offence) whether relating to events at or outside work	Legal obligation Our legitimate interests which are to investigate matters that may affect an employee's suitability for their role, protect our business, employees and clients, and manage employment risks appropriately. Third party legitimate interests of clients' where the information may affect an assignment, and legal advisers' legitimate interests in providing advice where required.	Employment Legal rights Deemed substantial public interest
Disciplinary and grievances issues	Contract performance Legal obligation Our legitimate interests which are to investigate allegations fairly, maintain workplace standards and protect employees and the business. Third party legitimate interests of external HR	Employment Legal rights

	consultants, legal advisers or investigators' legitimate interests in assisting with investigations where instructed.	
Legal disputes	Legal obligation Our legitimate interests which are to establish, exercise or defend legal claims. Third party legitimate interests of legal advisors, insurers, courts and regulators' in resolving legal proceedings and disputes.	Legal rights

Automated decision-making

Automated decision-making is the process of making decisions by automated means with or without any human involvement.

We do not make decisions about you based solely on automated processing that would have legal, or similarly significant, effects for you. We will notify you if this position changes.

Research purposes

[We may process your personal data for scientific research, historical research or statistical purposes. This may include scientific research that is publicly or privately funded, and research carried out on a commercial or non-commercial basis, including technological development, demonstration, fundamental research and applied research. It may also include public health research where the study is conducted in the public interest. Historical research may include, for example, genealogical research. Statistical purposes may include statistical surveys or the production of statistical results, provided that the information resulting from the processing is aggregate data that is not personal data and neither the personal data nor the resulting information is used in support of measures or decisions relating to a particular individual.

In some cases, it may not be possible to identify the precise purposes of a scientific research study at the outset. Where appropriate, we may therefore seek your broad consent to a defined area of scientific research, for example [INSERT DETAILS]. Where we do this, we will:

- clearly describe the area of scientific research covered by your consent;
- where the intended purposes of the processing allow, give you the opportunity to consent to only part of the research;
- explain whether and how you can withdraw your consent, and the effect of doing so; and

- ensure that seeking your consent is consistent with generally recognised ethical standards relevant to that area of research.

This approach to broad consent applies to scientific research and does not apply in the same way to historical research or statistical purposes.

When we process personal data for scientific research, historical research or statistical purposes, we will apply appropriate safeguards to protect your rights and freedoms, including technical and organisational measures such as data minimisation and, where appropriate, pseudonymisation. Personal data processed for those purposes is subject to strict conditions and safeguards and will not be used to make decisions or take measures about you as an individual except where this is permitted by applicable law.

Please note that some of your usual data subject rights may be restricted where we process your personal data for scientific research, historical research or statistical purposes. Please see [\[LINK TO YOUR RIGHTS IN RELATION TO YOUR DATA\]](#) for further information.

Further information about the lawful basis on which we process your personal data, and any additional condition applying to special category data, is set out in [\[INSERT DETAILS\]](#).

Personal data processed for scientific research, historical research or statistical purposes will be retained for [\[INSERT RETENTION PERIOD OR CRITERIA\]](#).

Data sharing

In certain circumstances, we need to share your personal data with third parties, including partners and service providers.

Any disclosures or data sharing will be done in accordance with the law or relevant contractual arrangements. All third parties are required to take appropriate security measures to protect your personal data. We only permit them to process your personal data for specified purposes and in accordance with our instructions. They are not allowed to use your personal data for their own purposes.

We will share your personal data with service providers (including contractors and designated agents) who carry out the following functions: pension administration, benefits provision and administration, and IT services.

We will share personal data regarding your participation in any pension arrangement operated by us with the trustees or scheme managers of the arrangement in connection with the administration of the arrangements.

We may need to share your personal data with third parties as part of any merger, acquisition, sale or restructure of our business.

We may need to share your personal information with a regulator or to comply with the law. This may include making returns to HMRC, disclosures to stock exchange regulators and disclosures to shareholders such as directors' remuneration reporting requirements.

Cross-border data transfers

Where we transfer your personal information from the UK to the European Economic Area (**EEA**), those transfers are made in accordance with the UK government's adequacy decision in favour of countries in the EEA and the European Commission's adequacy decision in favour of the UK.

Whenever we transfer your personal information out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data. For further details, contact the HR Department.

If you would like further details on the specific mechanism we use when transferring your personal information out of the UK, contact the HR Department.

Data security

We have implemented appropriate security measures to protect your personal information against accidental loss and unauthorised access, use, alteration or disclosure. Details of these measures are available from the HR Department.

We impose controls for access to employee data based on business requirements and in accordance with the relevant lawful bases for processing. Any party with access rights will only process your personal information in accordance with applicable data security policies and procedures, relevant employee obligations or third-party contractual terms.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

We will only retain your personal information in accordance with applicable laws, regulatory requirements or for as long as necessary to fulfil the purposes for which we collected it.

In some circumstances, you can ask us to delete your personal information. This is considered in the next section.

Once you are no longer an employee, worker or contractor of the company, we will retain and securely destroy your personal information in accordance with any applicable legal requirements.

Your rights in relation to your personal information

You have the following rights under data protection laws:

- **Request access** to your personal information (commonly known as making a data subject access request). We will provide you with copies of your personal information and other information, such as where we got the information from and who we have shared it with by conducting a reasonable and proportionate search.
- **Request rectification** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

If you want to exercise these rights, contact the HR Department in writing.

No fee usually required

Ordinarily you will not have to pay a fee to exercise any of these rights. However, we may charge a reasonable fee if your request is manifestly unfounded or excessive. Alternatively, we may refuse to comply with the request.

Questions or complaints

If you have any questions or concerns about this privacy notice or how we handle your personal information, or if you wish to exercise any of the rights it refers to, contact the HR Department who has been appointed to oversee compliance with this privacy notice and whose contact details are hr@mane.co.uk.

You also have the right to complain to us if you consider that there has been an infringement of your rights in relation to your personal data.

You can submit a complaint using the following channels:

- Email: hr@mane.co.uk
- Post: Mane Contract Services, Floor 3, 6 Hercules Way, WD25 7GS.
- Telephone: 01923 470700

When we receive a data protection complaint, we will:

- Acknowledge receipt no later than 30 days from receiving it.
- Take appropriate steps to respond without undue delay, which may include making enquiries into the subject matter of the complaint and, where appropriate, keeping you informed about the progress of our handling of the complaint.
- Inform you of the outcome without undue delay.

You also have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**). The ICO's contact details are as follows:

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

Acknowledgement of receipt

I, _____ (employee/worker/contractor name), acknowledge that on _____ (date), I received a copy of Mane's privacy notice for employees, workers and contractors and that I have read and understood it.

Signature

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Name

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