

Hallmark Care Homes Group Holdings Limited and subsidiaries - Privacy Notice - Employee

Details of the personal data we collect from you, what we do with it, how you might access it and who it might be shared with.

Why do we need your personal data?

Personal data is required to fulfill the requirements of an employment, contractual or service relationship which may exist between you and our organisation.

From our **Team Members** we process and retain personal data for the following purposes and periods, with the applicable legal basis.

Processing purpose	Legal basis	Retention period
Employment	6(1)(b) - we have a contract with the data subject	7 years from the end of the employment relationship.
Business operations and due diligence	6(1)(f) - it's in our legitimate interest (Business operations and due Diligence)	Until tax or other retention period expires
Employment	6(1)(c) - we have to comply with a legal obligation	7 years after employment has ended.
Employee performance management	6(1)(c) - we have to comply with a legal obligation	7 years after employment has ended.
PR	6(1)(a) - we have the data subject's consent	1 year for annual events, or 2 years otherwise.
Travel and events management	6(1)(f) - it's in our legitimate interest (Event management and award nomination)	3 years
Legal and regulatory compliance	6(1)(f) - it's in our legitimate interest (Legal and regulatory compliance)	7 years after employment has ended.
Health and safety	6(1)(c) - we have to comply with a legal obligation	7 years after employment has ended.
Learning and development	6(1)(c) - we have to comply with a legal obligation	7 years after employment has ended.
Insurance (for company car drivers or those that drive their car for work purposes)	6(1)(c) - we have to comply with a legal obligation	7 years after employment has ended.
Notification in emergency	6(1)(f) - it's in our legitimate interest (To contact emergency contacts in an emergency)	7 years after employment has ended.
Annual leave/holiday management	6(1)(b) - we have a contract with the data subject	7 years after employment has ended.
Employment relations	6(1)(f) - it's in our legitimate interest (As part of the onboarding, induction and exit interview process)	7 years after employment has ended.
Communications, marketing and intelligence	6(1)(f) - it's in our legitimate interest (Communications,	2 years of inactivity/60 days after team members leave.

	marketing and intelligence)	
Video surveillance	6(1)(f) - it's in our legitimate interest (Crime prevention and security)	30 days
Accident and incident management	6(1)(c) - we have to comply with a legal obligation	Non-serious 10 years. Serious 20 years.
Contract management	6(1)(b) - we have a contract with the data subject	7 years after employment has ended.
Communications, marketing and intelligence	6(1)(a) - we have the data subject's consent	1 month after employment has ended.
Identification	6(1)(f) - it's in our legitimate interest (Identification purposes)	7 years after employment has ended.
Legal and regulatory compliance	6(1)(c) - we have to comply with a legal obligation	7 years after employment has ended.
Stakeholder engagement	6(1)(f) - it's in our legitimate interest (Meetings with stakeholders)	2 years
Feedback investigation and management	6(1)(c) - we have to comply with a legal obligation	Category 1 & 2 feedback to be kept for 8 -years. Category 3 feedback - two years following resolution. Positive feedback - two years following receipt
COVID-19 risk mitigation	6(1)(e) - we are carrying out tasks in the public interest	For 6 months following the official end of the COVID-19 pandemic.
Team planning and deployment	6(1)(c) - we have to comply with a legal obligation	7 years
Site management and security	6(1)(f) - it's in our legitimate interest (Night security checks)	2 years
Compliance with the UK GDPR	6(1)(c) - we have to comply with a legal obligation	7 years from the request/incident.
Coaching and mentoring	6(1)(f) - it's in our legitimate interest (Coaching and mentoring)	7 years after employment has ended.
Information, system, network and cyber security	6(1)(f) - it's in our legitimate interest (Information, system, network and cyber security)	1 year after employment has ended.
Dermatitis screening	6(1)(c) - we have to comply with a legal obligation	40 years from the date of the screening.
Issuing payslips	6(1)(c) - we have to comply with a legal obligation	7 years after the employment relationship has ended.
Application for support from the Care Workers Charity	6(1)(a) - we have the data subject's consent	Until service completed
Development and delivery of training	6(1)(a) - we have the data subject's consent	3 years
Investigating allegations of abuse	6(1)(c) - we have to comply with a legal obligation	7 years after employment has ended.

What personal data do we collect?

- Banking Details

- Hours worked and rate of pay/salary
- National Insurance number
- Address
- Name
- Photographs together with Identifiers
- Signature
- Employment History
- Job role
- Feedback
- Contact details
- Date of birth and age
- Digital Images
- Education History
- Employment references
- Family
- Financial Details
- Formal identification documents
- Identification Number
- Professional body registration/ID
- Right to work documentation
- Telephone contact details
- Employee performance documentation i.e. supervisions, appraisals, probationary reviews, disciplinary and grievance documentation
- Employment contract
- Training records
- Exit interviews/reasons for leaving employment
- Location Information
- Visual Images
- Tax details and taxable benefits
- Personality profile/assessment
- Audio recordings (in bedroom only)

We collect special category personal data and do so under the following legal basis:

- Criminal record data
 - 9(2)(h) - For purposes of medicine, health or social care or health professionals
- COVID test details and result
 - 9(2)(i) - For reasons of public interest in the area of public health
- Health
 - 9(2)(b) - For employment, social security or social protection law
 - 9(2)(h) - For purposes of medicine, health or social care or health professionals
 - 9(2)(i) - For reasons of public interest in the area of public health
 - 9(2)(a) - Explicit consent of the data subject
- Sex life or Sexual orientation
 - 9(2)(b) - For employment, social security or social protection law
- Trade Union membership
 - 9(2)(b) - For employment, social security or social protection law

The following types of personal data is collected from sources other than from the employee.

Data subject type	Personal data type	Indirect source name
Team Members	Hours worked and rate of pay/salary	Hallmark Care Homes
Team Members	Hours worked and rate of pay/salary	Hallmark Care Homes
Team Members	Hours worked and rate of pay/salary	Hallmark Care Homes
Team Members	Employment references	Previous employer
Team Members	Job role	Hallmark Care Homes

Team Members	Job role	Hallmark Care Homes
Team Members	Personality profile /assessment	Savran
Team Members	Identification Number	Hallmark Care Homes
Team Members	Location Information	Hallmark Care Homes
Team Members	Visual Images	CCTV system

Should we intend to use the information for any other purpose, we will always inform you beforehand. We may collect the personal data of children, but this data will be required to maintain records e.g., with tax authorities or medical aid societies.

Who might we share your personal data with?

To maintain and improve our services, your personal data may need to be shared with or disclosed to service providers, other Controllers or, in some cases, public authorities. We may be mandated to disclose your Personal Data in response to requests from a court, police services or other regulatory bodies. Where feasible, we will consult with you prior to making such disclosure and, in order to protect your privacy, we will ensure that we will disclose only the minimum amount of your information necessary for the required purpose.

We transfer personal data to the following organisations and countries.

Data subject type	Organisation name	Type	Country
Team Members	AXA PPP	Controller	United Kingdom
Team Members	Adobe	Processor	Ireland
Team Members	Advanced	Processor	Netherlands
Team Members	Ally Labs	Processor	United Kingdom
Team Members	Articulate	Processor	United States
Team Members	Autumna	Processor	United Kingdom
Team Members	Award organisers	Controller	United Kingdom
Team Members	Barclays Bank	Controller	United Kingdom
Team Members	Bottomline	Processor	United Kingdom
Team Members	CCTV system	Processor	United Kingdom
Team Members	Candura	Processor	United Kingdom
Team Members	Care Workers Charity	Controller	United Kingdom
Team Members	Checkit	Processor	United Kingdom
Team Members	DP Systems	Controller	United Kingdom
Team Members	Data disposal company	Processor	United Kingdom
Team Members	Department of Health and Social Care (DHSC)	Controller	United Kingdom
Team Members	External regulators (CQC, CIW, HSE, ICO, Safeguarding team, DBS)	Controller	United Kingdom
Team Members	Fault Fixers	Processor	United Kingdom
Team Members	First Advantage	Controller	United Kingdom
Team Members	Flipping Book	Processor	Malta

Team Members	HM Revenue & Customs (HMRC)	Controller	United Kingdom
Team Members	Insurance provider and broker	Controller	United Kingdom
Team Members	Johnson Fleming	Controller	United Kingdom
Team Members	KareInn	Processor	United Kingdom
Team Members	Law enforcement body	Controller	United Kingdom
Team Members	Legal advisors	Controller	United Kingdom
Team Members	Local/funding Authority	Controller	United Kingdom
Team Members	Lottie	Processor	United Kingdom
Team Members	MediGold Health	Processor	United Kingdom
Team Members	MediaBase Direct	Processor	United Kingdom
Team Members	My Business Cloud Solution	Processor	United Kingdom
Team Members	Photographers	Processor	United Kingdom
Team Members	PrivIQ	Processor	United Kingdom
Team Members	Professional bodies (i.e. NMC and SCW)	Controller	United Kingdom
Team Members	Radar	Processor	United Kingdom
Team Members	Reach ATS	Processor	United Kingdom
Team Members	Relish	Processor	United Kingdom
Team Members	Reward Gateway	Processor	Germany
Team Members	Safety Culture	Processor	United Kingdom
Team Members	Sage	Processor	United Kingdom
Team Members	Savran	Controller	United Kingdom
Team Members	Sherpa	Processor	Ireland
Team Members	Text Anywhere	Processor	United Kingdom
Team Members	Vena Solutions UK Ltd	Processor	United Kingdom
Team Members	Vervate	Processor	United Kingdom
Team Members	Vyond	Processor	United States
Team Members	Web and design agency	Processor	United Kingdom
Team Members	Westfield Health	Controller	United Kingdom
Team Members	YouTube	Processor	United States
Team Members	Your Care Consultancy	Processor	United Kingdom
Team Members	Your Hippo	Processor	United Kingdom
Team Members	great{with}talent	Processor	United Kingdom

When a Processor or Controller is in a country outside the UK, we apply the necessary safeguards which may include, confirming the UK approves of transfers to the country, whether we need to use the UK's model contracts or, if the transfer is internal to our organisation, commitment to Binding Corporate Rules. Details of these safeguards may be obtained by contacting HR.

How do we look after personal data

We limit the amount of personal data collected only to what is fit for the purpose of the employment relationship. We restrict, secure and control all of our information assets against unauthorised access, damage, loss or destruction; whether physical or electronic, and we ask that our employees assist us in these activities. We retain personal data only for as long as is necessary to fulfil the requirements of the employment relationship, respond to requests from employees, or longer, if required by law. If we retain your personal data for historical or statistical purposes we ensure that the personal data cannot be used further. While in our possession, together with your assistance, we try to maintain the accuracy of your personal data.

How can you access your personal data?

As an employee you have the following rights.

You have the right to request of our company, access to your personal data which we might hold as well as the rights to rectify, erase or restrict the processing of such information. You may make a request for access to your personal data from our company website, or directly to our HR department. Where you have previously given consent to process your personal data, you have right to request that your personal data be ported (transferred) to a different service provider, or to yourself

Where it may have been necessary to get your consent to use your personal data, at any moment, you have the right to withdraw that consent. If you withdraw your consent, we will cease using your personal data without affecting the lawfulness of processing based on consent before your withdrawal.

Our Contact Information (Data Controller)

Hallmark Care Homes Group Holdings Limited and subsidiaries
Hallmark Care Homes
2 Kingfisher House, Woodbrook Crescent, Radford Way, Billericay, Essex
CM12 0EQ
United Kingdom
Telephone: +441277655655
Company Email: info@hallmarkcarehomes.co.uk

Our Data Protection Officer

Nick Banister-Dudley
dpo@hallmarkcarehomes.co.uk
Telephone: +01277 655655

Information Commissioner

You have the right to lodge a complaint with the Information Commissioner. See contact details below.

Information Commissioner's Office
Water Lane, Wycliffe House
Wilmslow - Cheshire SK9 5AF
United Kingdom
casework@ico.org.uk
+44 303 123 3113
www.ico.org.uk