



COLLEAGUE FAIR PROCESSING NOTICE

Introduction

This notice contains important information about how your personal data (further described below) will be used by Together Financial Services Limited, a company registered in England and Wales under company registration number 02939389, on its behalf and on behalf of its subsidiary companies and; Together Personal Finance Limited (company registration number 02613335) and Together Commercial Finance Limited (company registration number 02058813), together trading as Together, and each having its registered office address situated at Lakeview, Lakeside, Cheadle, Cheshire, SK8 3GW ("**Together**", "**we**", "**us**") during the course of your engagement with Together. ,

This notice sets out your associated legal rights in accordance with data protection legislation (which is described in more detail below). We may update this notice at any time and where we make a material update to this notice, we will notify you by email.

What is personal data?

Personal data broadly means information that relates to an identified or identifiable living individual ("identifiable" refers to being able to identify the living individual when the information held is combined with other information).

Scope

This notice applies to all temporary, permanent, former and active employees, colleagues, contractors, applicants and secondees ("**you**" or "**your**").

We may also collect information in respect of your family members where it is supplied to us by you. If you supply us with personal data about their family members you confirm that you have directed that family member to a copy of this privacy notice.

Compliance with data protection laws

Together is committed to processing your personal data ("**Colleague Personal Data**") in compliance with the European Union (EU) and United Kingdom (UK) data protection laws and regulations, including from the 25 May 2018, the General Data Protection Regulation (EU2016/679) "**Data Protection Laws**".

We respect your privacy rights and apply appropriate safeguards to protect their personal data.

Types of personal data

We hold and use the following Colleague Personal Data:-

- Name, address and other contact details for you and next of kin;
- Information about your work and performance, including performance review records and training records;
- Bank account details, taxation codes, National Insurance and other Identification numbers;
- Information relating to grievance or disciplinary matters;
- Information relating to your health and health conditions including Occupational Health records;
- Absence data;
- Race and ethnicity, which we may store if you choose to provide us with these details;

- Information in respect of your criminal convictions, where we have conducted disclosure barring checks or criminal background checks on you to confirm your fitness for employment; Communications and correspondence;
- On-line activities including cookies; and
- Other information provided or obtained during the course of your application, engagement or employment.

Uses of Colleague Personal Data

We may need to use Colleague Personal Data to:-

- Recruit, employ, manage and remunerate you;
- Provide benefits (such as life insurance) and other workplace services to you;
- Maintain your health and safety record and that of third parties, including in relation to Occupational Health;
- Manage your attendance and all related issues, performance management, promotion, training, career development, discipline and grievances;
- Undertake performance appraisals and reviews;
- Resolve grievances and complaints that involve you (for example as part of an internal investigation or disciplinary matter);
- To support you in your roles;
- Ensure your compliance with Together's policies and legal obligations (including monitoring and investigation in accordance with Together's policies and the law);
- Monitor Together's compliance with its obligations regarding discrimination;
- Calculate pension and other benefits, insurance, payroll, tax, National Insurance;
- Comply with statutory and regulatory obligations on Together, for example to conduct fraud prevention checks via Cifas (as set out below) as part of our on-boarding process or to comply with its obligations in relation to national living wages and to monitor its compliance with such obligations;
- To monitor and improve our ways of working (for example in relation to monitoring workforce equality, diversity, equal pay, as well as workforce composition and allocation, onsite facilities and maintenance);
- Manage legal disputes involving Colleagues and or third parties;
- Contact you / next of kin in the event of an emergency;
- Send you communications about Together, social activities and events;
- Provide references to financial institutions, training and education providers and/or potential future employers;
- Maintain accurate records relating to your employment; and
- Where we are able to do so, for developing the TFSL brand awareness, including internal and external communications across multiple channels.

Disclosures of Colleague Personal Data

We use third parties to provide some services to Together, and this means that Colleague Personal Data may be disclosed to third parties outside Together, for example -

- We may share your personal data with Together's professional advisers, such as solicitors or accountants, and consultants;
- Where we are required to do so by law or regulation, government departments and agencies, police and law enforcement agencies, regulators, courts and tribunals;
- We may share your personal data with Together's Insurers;
- We may share your personal data with our suppliers (for example, a company that supplies office equipment) if necessary in the performance of your role;
- Our service providers, for example where a service provider provides us with outsourced services (such as payroll administration, training, employee share scheme administration, union services, facilities management, IT support);
- We may share your personal data with our occupational healthcare providers (such as Medigold) who may provide healthcare to you at work;
- We may share your personal data with your benefit providers, such as Canada Life who provide Together's employees with life insurance;
- Where you make such a request, we may share your personal data with other third parties (e.g. a future employer requesting a reference or mortgage provider requesting confirmation of salary details); and
- Additionally, prior to making any offer of employment or engagement to you, we will share your name, date of birth and address information with Cifas in the manner set out below.

The personal data we have collected from you will be shared with Cifas who will use it to prevent fraud, other unlawful or dishonest conduct, malpractice, and other seriously improper conduct. If any of these are detected you could be refused certain services or employment. Your personal data will also be used to verify your identity. Further details of how your information will be used by us and Cifas, and your data protection rights, can be downloaded from www.cifas.org.uk/privacy-notice.

Legal basis for using Colleague Personal Data

In general, Together collects and uses Colleague Personal Data because it is necessary for:-

- Fulfilling our duties relating to employment contracts (for example to manage and pay you);
- Taking steps to enter into employment contracts; or
- Compliance with legal obligations.

In addition, we may sometimes process Colleague Personal Data, and in particular sensitive personal data, on the basis that:-

- It is necessary for the purposes of carrying out the obligations and exercising your or Together's specific rights in relation to employment;
- Where it is necessary for the purposes of occupational health;
- You provide your explicit consent (which can be withdrawn at any time); or
- It is necessary for the establishment, exercise or defence of legal claims.

International transfers of data

We currently do not intend to transfer Colleague Personal Data to third parties and organisations who hold data outside of the European Economic Area (EEA).

In the event that we transfer Colleague Personal Data outside the EEA, we will notify you and we will ensure that appropriate safeguards are in place, such as the use of the EU Commission approved model contract clauses to protect your information in accordance with Data Protection Laws.

Data retention

We will not retain Colleague Personal Data for longer than necessary and will delete it once it is no longer required for the purposes set out in this Policy. Whilst different periods apply for different types of Colleague Personal Data, unless required by regulation, for the establishment, exercise or defence of any legal claims, or for occupational health reasons the longest we will normally hold any Colleague Personal Data is for 6 years after termination of employment. If you apply for a role with us and are unsuccessful then, in the absence of your specific consent, we will retain your data for a maximum of 2 years.

Your rights

You have a number of rights under Data Protection Laws. These are set out below. You may contact Together's Data Protection Officer using the details below to exercise any of these rights and who will respond to any request received from you within one month from the date of the request.

Right 1	A right to access personal data held by us about you.
Right 2	A right to require us to rectify any inaccurate personal data held by us about you.
Right 3	A right to require us to erase personal data held by us about you. This right will only apply where (for example): we no longer need to use the personal data to achieve the purpose we collected it for. Therefore, typically, this right will not be enforceable until after termination of your employment
Right 4	A right to restrict our processing of personal data held by us about you. This right will only apply where (for example): you dispute the accuracy of the personal data held by us; or where you would have the right to require us to erase the personal data but would prefer that our processing is restricted instead; or where we no longer need to use the personal data to achieve the purpose we collected it for, but you require the data for the purposes of dealing with legal claims. Therefore, typically, this right will not be enforceable until after termination of your employment
Right 5	A right to receive personal data, which you have provided to us, in a structured, commonly used and machine readable format. You also have the right to require us to transfer this personal data to another organisation, at your request.
Right 6	A right to object to our processing of your personal data.
Right 7	A right to withdraw your consent, where we are relying on it to use your personal data (for example, where you have provide a "just in time" consent notice you may withdraw this consent at any time).

Changes to Personal Details

Please ensure that you keep your personal details up to date e.g. name, address, marital status, bank details, next of kin or life assurance details. You can do this quickly and easily yourself using the Cascade System. In some instances, formal documentation may be requested to process the request.

Should a Contractor wish to make amends to their personal details, they are required to liaise with HR directly.

Breaches

You must abide by Together's instructions and policies in respect of your handling of personal data and you must take part in any required data protection training. Any breach will be taken seriously and may result in disciplinary action.

Complaints

If you are unhappy about the way your personal data has been handled by Together, Together's Data Protection Officer would be happy to help. The Data Protection Officer at Together is Daniel Merrick. He can be contacted on dpo@togetherfinance.com.

Alternatively, you have the right to complain to the Information Commissioner's Office (ICO) by calling 0303 123 1113. The ICO is the UK's independent body set up to uphold information rights. You can find out more about the ICO on its website (<https://ico.org.uk/>).