



## 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, 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 United Kingdom (UK) data protection laws and regulations, including the Data Protection Act 2018, the UK General Data Protection Regulation and the Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR).

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;
- Details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with other organisations;
- 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 credit history and/or criminal convictions, where we have conducted disclosure barring checks and/or 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 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, regulating bodies, training and education providers and/or potential future employers; and
- Maintain accurate records relating to your employment.

### **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 who may provide healthcare to you at work;
- We may share your personal data with your benefit providers, such as insurance companies 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
- Where we are required to, we may share your personal data with regulatory bodies such as the Financial Conduct Authority (which could include, performance reviews, conduct reports and any disciplinary matters related to you).
- 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/fpn](http://www.cifas.org.uk/fpn)

### **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 special category 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; 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 outside the UK.

In the event that we transfer Colleague Personal Data outside the UK, we will notify you and we will ensure that appropriate safeguards are in place 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 Notice. 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 7 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 1 year.

### **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.

- **The right to be informed**  
As a data controller, we are obliged to provide clear and transparent information about our data processing activities. This is provided by this Fair Processing Notice and in any related communications we may send you.
- **The right of access**  
You may request a copy of the personal data we hold about you free of charge. Once we have verified your identity, we will provide access to the personal data we hold about you. If there are exceptional circumstances that mean we might have to refuse to provide the information, we will explain them. If requests are frivolous or vexatious, we reserve the right to refuse them. If answering requests is likely to require additional time or occasions unreasonable expense (which you may have to meet), we will inform you.
- **The right to rectification**  
When you believe we hold inaccurate or incomplete personal information about you, you may exercise your right to correct or complete this data. This may be used with the right to restrict processing to make sure that incorrect/incomplete information is not processed until it is corrected.

- **The right to erasure (the ‘right to be forgotten’)**  
Where no overriding legal basis or legitimate reason continues to exist for processing personal data, you may request that we delete the personal data. We will take all reasonable steps to ensure erasure.
- **The right to restrict processing**  
You may ask us to stop processing your personal data. We will still hold the data, but will not process it any further. This right is an alternative to the right to erasure. If one of the following conditions applies you may exercise the right to restrict processing:
  - a) The accuracy of the personal data is contested;
  - b) Processing of the personal data is unlawful;
  - c) We no longer need the personal data for processing but the personal data is required for part of a legal process;
  - d) The right to object has been exercised and processing is restricted pending a decision on the status of the processing.
- **The right to data portability**  
You may request your set of personal data to be transferred to another controller or processor, provided in a commonly used and machine-readable format. This right is only available if the original processing was on the basis of consent, the processing is by automated means and if the processing is based on the fulfilment of a contractual obligation.
- **The right to object**  
You have the right to object to our processing of your data where:
  - a) Processing is based on legitimate interest;
  - b) Processing is for the purpose of direct marketing;
  - c) Processing involves automated decision-making and profiling.
- **Rights regarding automated decision-making and profiling**  
You have the right not to be subject to a decision based solely on automated processing, including profiling, which has legal effects for you or affects you in any other significant way.

### **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 HR 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.

### **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 can be contacted by emailing [dpo@togethermoney.com](mailto:dpo@togethermoney.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/>).