

#### **Effective From**

15/06/2023

# Privacy Notice for Employees

MJ Gleeson plc and its associated companies and undertakings ("Gleeson") is committed to respecting your privacy.

Please read the following notice to understand how your personal information will be collected, stored, and treated by Gleeson. This notice may change from time to time so please check it regularly.

This Gleeson privacy notice applies to all personal information that you or a third party provide to us.

By entering into a contract of employment with Gleeson, or by applying for an employment position with Gleeson, you agree to be bound by this notice in respect of the personal information collected about you.

#### **Data Protection**

As a data controller we are committed to protecting and respecting the privacy of our employees and prospective employees. We take data protection very seriously and comply with all relevant legislation when handling any personal information given or received from you or third parties.

#### This is the personal data we collect, why we're allowed to process it and how long we keep it

Who	Past employees	Present employees	Prospective employees
<b>What</b> (Personal Data)	Name, contact details (including emergency contact details), employment details (including absence, grievance and disciplinary records and performance reviews), pension arrangements, training, medical (including health data and sickness records), ethnicity and disability records, nationality and other information contained on national identification documents, driving licence, bank / payroll details, details of shares held in the Company, CCTV/photographic	Name, contact details (including emergency contact details), employment details (including absence, grievance and disciplinary records and performance reviews), pension arrangements, life assurance beneficiary details, training, medical (including health data and sickness records), ethnicity and disability records, nationality and other information contained on national identification documents, driving licence,	Name, contact details, employment history and CV, and details given in references.





images, details of your use of business-related social media (such as LinkedIn) and information about your use of our IT, communication and other systems (including data contained in Gleeson mailboxes prepared in the course of employment). bank / payroll details, details of shares held in the Company, CCTV/ video footage and photographic images, details of your use of business-related social media (such as LinkedIn), information about your use of our IT, communication and other systems (including data contained in Gleeson mailboxes prepared in the course of employment), and information you provide to us in employee questionnaires, surveys and/or feedback.

# Where / How (Source)

From you, your contract of employment, HR forms and records, post-employment information provided by the employee or their new employer, medical or occupational health professionals we engage with, other employees, our shares registrar, relevant websites or applications, our IT related and communication systems cameras and CCTV.

From you, your contract of employment, HR forms and records, payroll forms, medical and occupational health professionals we engage with, other employees, our shares registrar, relevant websites or applications, our IT related and communication systems, cameras and CCTV.

From you, enquiry letters and CV's, from recruitment professionals we engage with and references we receive.

# Why (rationale / legal basis)

To meet our contractual, legal and statutory obligations, to assist you or your representatives with any postemployment matters, for security and crime prevention and to serve our legitimate business interests.

To protect your rights, pay you, meet our contractual, legal and statutory obligations, ensure your records are current, to serve our legitimate business Interests and for security and crime prevention.

To assess your suitability for the role(s) you have applied for, to progress your enquiry and to serve our legitimate business interests.





# How long we keep data

Contact details, employment, training and medical records will be retained until 3 years after your date of death. Ethnicity and disability information will be retained for 12 months after leaving. Bank and payroll details will be retained for 6 months or longer if additional payments are anticipated. Payroll information, expense payments and account details to which they were made will be retained for 7 years. Documentation in relation to a post-employment matter will be destroyed once the matter is concluded absolutely.

Information is retained for the duration of your employment. On completion of your employment, your records will be retained in accordance with the Data Retention Policy for 'Past Employees'. 12 months from the employment application.

# **Call recording**

We may monitor and record telephone calls that are received by our Sales Executives from customers via the Gleeson website, brochures, direct mail or signage which have a specific call tracking number assigned to them by the system known as 'Infinity'.

Calls may be recorded or monitored for the following purposes, which serve our legitimate business interests:

- 1. to ascertain or demonstrate standards that are or ought to be achieved by our staff and for the purpose of staff training; and
- 2. to establish the existence of facts relevant to the business, such as keeping a record of instructions given by telephone which can be reviewed in the event of a customer complaint.

#### **Video Recording**

We may monitor and record interactions between Gleeson employees and customers to serve our legitimate business interests. Namely, to ascertain or demonstrate standards that we are or ought to be achieved by our staff, to analyse and review mystery shops and for the purpose of staff training.

#### We use Cookies

Please <u>click here</u> to view the Gleeson Cookie Policy.



## This is how we share your personal data

We may share your personal data within the Gleeson group of companies.

We store data using third party providers in both digital and paper form. We also share your data with a range of service providers including but not limited to HMRC, regulatory authorities (such as the Information Commissioners Office), pension, life assurance and health providers, our shares registrar, our legal advisors, insurers, and software and applications service providers.

#### Storage of your personal data

We will store digital or hard copy data on our premises or it may be transferred to a secure third party facility for storage. We will keep your information secure by taking appropriate technical and organisational measures.

Your personal data may be processed both within the European Economic Area ("EEA") and outside the EEA. If we process your personal data at a destination outside the EEA we confirm that we have appropriate contracts in place with any third parties based outside the EEA to ensure your data is processed in accordance with applicable data protection laws.

#### Links from our website

If you reach our website via an external link or click a link to an external site from our website our Privacy Notice will not apply. We are not responsible for the accuracy of third party websites.

# **Your Rights**

Under Data Protection legislation you have a number of rights. These include:

- The right to know how we use and handle your personal information
- The right to access the personal information that we are handling and to information contained within this privacy notice
- The right to anonymise your personal information, or for us to correct any mistakes in the information we hold
- The right at any time to object to direct marketing or for you to be removed from our databases or mailing lists
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling



If you have any questions or complaints relating to how we use your personal information, or if you wish to exercise any of your rights regarding your personal information, please write to us at the following address and enclose appropriate identification in order that we may confirm your identity:

Company Secretary MJ Gleeson PLC 6 Europa Court Sheffield Business Park Sheffield S9 1XE

# Our company registration and data processing registration details

Gleeson Homes and Gleeson Strategic Land operate as divisions of MJ Gleeson plc from the following subsidiary companies:

Gleeson company	Company registered number	Data protection registered number
MJ Gleeson plc	9268016	ZA113503
Gleeson Developments Limited	848808	Z7561821
Gleeson Regeneration Limited	3920096	Z7561849
Gleeson Developments (North East) Limited	3867699	ZA181177
Gleeson Land Limited	5181745	ZA249157
Gleeson Land (Fleet) Limited	5742750	ZA368520

The registered address of all Gleeson companies is:

6 Europa Court Sheffield Business Park Sheffield S9 1XE

# **Information Commissioner's Office**

You may contact the Information Commissioner's office to log a complaint either via their website: ico.org.uk or by calling 0303 123 1113.

# **Changes to this Privacy Notice**

We are regularly updating our Privacy Notice. The latest version of this privacy notice can be obtained from the HR or Legal department.

Last updated on 15/06/2023.