PRIVACY NOTICE FOR CONTRACTORS

In accordance with the General Data Protection Regulation (GDPR), Peer Group PLC of The Peer Suite, The Hop Exchange, 24 Southwark Street, London, SE1 1TY has implemented this privacy notice to inform you of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

A) DATA PROTECTION PRINCIPLES

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

a) processing is fair, lawful and transparent
b) data is collected for specific, explicit, and legitimate purposes
c) data collected is adequate, relevant and limited to what is necessary for the purposes of processing
d) data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
e) data is not kept for longer than is necessary for its given purpose
f) data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
g) we comply with the relevant GDPR procedures for international transferring of personal data

B) TYPES OF DATA HELD

Personal data is any information about an individual from which that person can be identified. It does not include anonymous data which does not identify the individual.

We collect, store and use several categories of personal data about you in order to carry out effective and efficient processes. We keep this data in a file relating to each contractor and we also hold the data within our computer systems, for example, our accounts systems. It is your responsibility to keep us up to date with any changes to your personal details so that we can make sure that your personal data is accurate. If your personal details change, you must notify your contact at Peer Group PLC, with an email copied to legal@peergroup.co.uk.

Specifically, we collect, store and use the following types of data:

a) personal details such as name, previous names, title, address, phone numbers, email address, date of birth
b) your photograph
c) your gender
d) marital status
e) bank account details
f) payment rates
g) CCTV footage
h) building access card records

C) COLLECTING YOUR DATA

You provide several pieces of data to us directly during any contract negotiation period, for example your name and address, and subsequently upon the start of your engagement, for example, your bank details.

In some cases, we will collect data about you from third parties, such as intermediaries who may act as an introducer.

Personal data is kept in files or within the Company's HR and IT systems.

D) LAWFUL BASIS FOR PROCESSING

The law on data protection allows us to process your data for certain reasons only. In the main, we process your data in order to comply with a legal requirement, in order to perform the contract we have with you or in pursuit of our legitimate interests.

The information below categorises the types of data processing we undertake and the lawful basis we rely on.

Activity requiring your data	Lawful basis
Carry out the contract that we have entered into with you e.g. using your name, contact details	Performance of the contract
Ensuring you receive payment	Performance of the contract
Making decisions about who to enter into a contract with	Our legitimate interests which are to ensure we engage competent, qualified, and reliable contractors or partners who align with our business standards.
Business planning and restructuring exercises	Our legitimate interests which are to optimise our commercial operations, manage corporate efficiency, and ensure the long-term viability of our business.
Dealing with legal claims made against us	Our legitimate interests which are to defend our legal rights, protect corporate assets, and manage risk through appropriate legal counsel.
Preventing fraud	Our legitimate interests which are to maintain financial integrity, detect fraudulent activities, and secure our supply chain and assets.
Ensuring our administrative and IT systems are secure and robust against unauthorised access	Our legitimate interests which are to safeguard business-critical systems, prevent cyber security breaches, and protect any third-party data we host.

E) SPECIAL CATEGORIES OF DATA

Special categories of data are data relating to your:

a) health
b) sex life
c) sexual orientation
d) race
e) ethnic origin
f) political opinion
g) religion
h) trade union membership
i) genetic and biometric data.

Most commonly, we will process special categories of data when the following applies:

a) you have given explicit consent to the processing
b) we must process the data in order to carry out our legal obligations
c) we must process data for reasons of substantial public interest
d) you have already made the data public.

We do not need your consent if we use special categories of personal data in order to carry out our legal obligations. However, we may ask for your consent to allow us to process certain particularly sensitive data. If this occurs, you will be made fully aware of the reasons for the processing. As with all cases of seeking consent from you, you will have full control over your decision to give or withhold consent and there will be no consequences where consent is withheld. Consent, once given, may be withdrawn at any time. There will be no consequences where consent is withdrawn.

F) FAILURE TO PROVIDE DATA

Your failure to provide us with data may mean that we are unable to fulfil our requirements for entering into a contract with you or performing the contract that we have entered into.

G) CRIMINAL CONVICTION DATA

We will only collect criminal conviction data where it is appropriate given the nature of the services you are to provide to us and where the law permits us. This data will usually be collected during contract negotiation, however, may also be collected during your engagement. We use criminal conviction data to determine your suitability, or your continued suitability for the engagement. We rely on the lawful basis of our legitimate interests to process this data.

H) WHO WE SHARE YOUR DATA WITH

Employees within our company who have responsibility for recruitment, administration of payment and contractual benefits and the carrying out of performance related procedures will have access to your data which is relevant to their function. All employees with such responsibility have been trained in ensuring data is processed in line with GDPR.

Data is shared with third parties for the following reasons: for the administration of payroll. The third parties who will process your personal data for this purpose are Sage Group PLC, Peninsula Business Services Limited, and Trace Solutions Ltd.

We may also share your data with third parties as part of a Company sale or restructure, or for other reasons to comply with a legal obligation upon us.

We have a data processing agreement in place with such third parties to ensure data is not compromised. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

We do not share your data with bodies outside of the European Economic Area.

I) PROTECTING YOUR DATA

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

J) RETENTION PERIODS

We only keep your data for as long as we need it for, which will be at least for the duration of your engagement with us though in some cases we will keep your data for a period after your engagement has ended. Our retention periods are listed at peergroup.co.uk/legal.

K) AUTOMATED DECISION MAKING

Automated decision making means making decisions about you using no human involvement e.g. using computerised filtering equipment. No decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

L) DATA SUBJECT RIGHTS

You have the following rights in relation to the personal data we hold on you:

a) the right to be informed about the data we hold on you and what we do with it
b) the right of access to the data we hold on you. More information on this can be found in our separate policy on Subject Access Requests
c) the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as 'rectification'
d) the right to have data deleted in certain circumstances. This is also known as 'erasure'
e) the right to restrict the processing of the data
f) the right to transfer the data we hold on you to another party. This is also known as 'portability'
g) the right to object to the inclusion of any information
h) the right to regulate any automated decision-making and profiling of personal data.

More information can be found on each of these rights in our separate policy on your rights in relation to your data.

M) CONSENT

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data.

N) MAKING A COMPLAINT

If you consider your data rights have been breached, you can make a complaint to us at any time using any of the following methods:

- Email: legal@peergroup.co.uk
- Post: The Peer Suite, The Hop Exchange, 24 Southwark Street, London, SE1 1TY
- Telephone: 020 7940 8900

More information is available in our separate policy on Data Protection Complaints available at peergroup.co.uk/legal.

You can also raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.

O) DATA PROTECTION COMPLIANCE

Our appointed compliance officer in respect of our data protection activities is:

Michael Breeze
mdb@peergroup.co.uk