

PRIVACY POLICY – LIBERTY HR LIMITED

Liberty HR Limited (Liberty HR) is committed to protecting and respecting the privacy of clients and others using our services and website. Liberty HR is a “data controller”. This means that we are responsible for deciding how we hold and use personal information.

This Policy is supplemented by Privacy Notices and contracts which are provided as appropriate to clients, contractors, employees, service providers and applicants. We also have contracted agreements with those who process data on our behalf.

Legal basis for processing

If you are seeking or obtaining HR advice or services from Liberty HR, the personal information we collect is necessary:

- for the performance of the contract you are entering into with us
- for compliance with a legal obligation to which we are subject
- for the purposes of the legitimate interests of Liberty HR.
- In addition we may also process information based upon your consent.

Data protection principles

We are committed to the data protection principles and will ensure that personal data is:-

- used lawfully, fairly and in a transparent way
- collected only for valid purposes that we have clearly explained and not used in any way that is incompatible with those purposes
- relevant and limited to the purposes we have collected it for
- accurate and kept up to date
- kept only as long as necessary for the purpose
- kept securely.

We take appropriate steps to ensure that our systems, processors and staff and associates comply with the law in terms of the information we handle. We take appropriate steps to demonstrate compliance with the data protection principles.

Website

We only collect information that you provide to us on the contact form. This is your name, telephone number, email address and any details of your enquiry. We do not store any cookie information. The personal information you may choose to provide via our contact page will be received by us as an email and will only be used internally by Liberty HR to arrange a further contact.

Personal information we collect from you on Contact with a member of the team

If you are a new or existing client or contact we will collect and process the following data about you.

Information you give us.

This is information about you that you give us by filling in forms on our website, by communicating with us by phone, e-mail or otherwise. It includes information you provide when you seek HR advice from us or utilise our training services. The information you give us may include:-

- Personal contact details such as name, title, addresses, telephone numbers, personal email addresses and next of kin
- Bank details
- Date of birth
- Gender
- Marital status and dependants
- National Insurance number
- Bank account details, payroll records and tax status information
- Salary, annual leave, pension and benefits information
- Start date
- Location of employment or workplace
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process)
- Employment records (including job titles, work history, working hours, training records and professional memberships)
- Compensation history
- Performance information/appraisals
- Disciplinary and grievance information
- Information about your use of our information and communications systems
- CCTV footage and other electronic means, such as clocking swipe card records
- Photographs.

We may also collect, store and use the following “**special categories**” of more sensitive personal information when you are seeking advice through the services we offer including:

- Information about race or ethnicity, religious beliefs, community background, sexual orientation and political opinions
- Trade union membership
- Information about health, including any medical conditions, health and sickness records
- Information about criminal convictions and offences
- Information in relation to security vetting and AccessNI
- Information we may obtain from other parties.

Uses made of the information

We use information held in the following ways:

- to provide you with HR advice and support;

- to provide you with the information and services that you request from us (e.g. HR support or training);
- to provide you with information about other services we offer that are similar to those that you have already enquired about or availed of;
- to carry out administration for regulatory or management purposes (e.g. billing);
- to comply with our legal obligations;
- notify you about changes to our service;

Disclosure of your information

We may need to disclose your personal information (and client employee information) to third parties, including third party service providers and other entities such as;

- Lawyers, GP's, Occupational Health Providers, Recruiters, Recruitment Job Sites, Private Investigators, Accountants, Payroll Providers, Administrative and PA Support, Employers Representative Bodies (e.g. Federation of Small Business, Chartered Institute of Personnel and Development). The information disclosed will be limited to that which is required for providing the service
- Insurers (in the event of claims)
- Complaints regulatory activities
- Statutory Bodies
- Quality Standard Inspectors
- As required by law e.g. to comply with requests for Discovery, to enforce the terms of our contract;
- Other parties and/or Courts/Tribunals for the purposes of legal or prospective legal proceedings.

We require third parties to respect the security of your data and to treat it in accordance with the law. We may transfer your personal information (and client employee information) outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information (and client employee information).

Where we store your personal data

All information you provide to us is stored securely (in the form of manual records, electronic records, external hosted service and cloud service). Liberty HR takes appropriate measures to secure personal data and protect it from loss or unauthorised disclosure or damage. We have put in place appropriate security measures to prevent your personal information (and client employee information) from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information (and client employee information) to those who have a genuine business need to know it. Those processing your information (and client employee information) will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

How long your personal data will be kept

In summary we will normally hold;

- Personal data obtained from clients and service providers for 7 years after the relationship has concluded or the matter on which advice, assistance and support has been obtained has concluded.
- Personal data on employees/workers/contractors will be retained for a period of 7 years after the relationship has concluded.
- On the basis of a risk assessment information may be held for a longer period and you will be advised of this.

Your rights

Under Data Protection legislation you have a number of important rights free of charge. In summary, those include rights to:

- fair processing of information and transparency over how we use your use personal information
- access to your personal information
- require us to correct any mistakes in your information which we hold
- require the erasure of personal information concerning you in certain situations
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal information concerning you for direct marketing
- object in certain other situations to our continued processing of your personal information
- otherwise restrict our processing of your personal information in certain circumstances

For further information on each of those rights, including the circumstances in which they apply, contact the UK Information Commissioner's Office (ICO) at <https://ico.org.uk>

Contact us

If you would like to exercise any of those rights or discuss any aspect of this Policy please email, call or write to us via our Data Protection Partner at:

*Data Protection Manager
Liberty HR Limited
Erne House
3 Black Stick Road
Enniskillen, Northern Ireland
BT74 4EB*

How to complain

We hope that we can resolve with you directly any query or concern you raise about our use of your information.

The Data Protection legislation also gives you the right to lodge a complaint with the UK Information Commissioner who may be contacted at <https://ico.org.uk>

Do you need extra help?

If you would like this notice in another format (for example: audio, large print) please contact us as outlined above.

Changes to our privacy policy

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.