

# Colleague - Privacy Notice

## 1. Introduction

Central England Co-operative Limited (CEC) is committed to ensuring the privacy of colleagues is protected. Should we ask you to provide personal data, then it will only be used in accordance with this Privacy Notice. CEC collects and processes personal data relating to you to manage our employment relationship. We are committed to being transparent about how we collect and use that personal data and to meet our data protection obligations.

## 2. Who we are

Central England Co-operative Limited (CEC)

**ICO registration:** Z616328X

Queen Street  
Lichfield  
Staffordshire  
WS13 6QD

We have appointed Bruce & Butler as our outsourced Data Protection Officer (DPO), who can be contacted via the following email address should you have any questions about the way your personal data is handled.

**Email:** [enquiries@centralcoop.co.uk](mailto:enquiries@centralcoop.co.uk)

## 3. Personal data we collect about you

We collect and process a range of personal information about you, to allow us to manage our employment relationship. This includes:

| Category of personal information | Description                                                                                                                                                                                                           |
|----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Identity details</b>          | First name, last name, title, driving license, date of birth, national insurance number, passport, birth certificate, signature, image, biometric data (fingerprint), emergency contact details, next of kin details. |
| <b>Contact details</b>           | Telephone number(s), email address(es), postal address(es), work address(es).                                                                                                                                         |
| <b>Tax details</b>               | Tax code, tax contributions P11D, P45, P60 forms                                                                                                                                                                      |
| <b>Salary details</b>            | Yearly salary or hourly wage, pension deductions, holiday pay, sick pay, maternity pay, remuneration package.                                                                                                         |

|                                    |                                                                                                                                                            |
|------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Bank details</b>                | Sort code, account number, account name, bank branch.                                                                                                      |
| <b>Leave details</b>               | Dates of absence, reason for absence (sickness, holiday, maternity, paternity, etc.)                                                                       |
| <b>Education details</b>           | School/college/universities attended, qualifications achieved, learning outcomes, test results.                                                            |
| <b>Equal opportunities details</b> | Diversity indicator, racial or ethnic origin, sexual orientation, religious & philosophical beliefs.                                                       |
| <b>Job details</b>                 | Job description, CV, work history, references, contracted hours, department, start date, progression opportunities, work location, work relationship data. |
| <b>Health details</b>              | Medical history, mental health details, disability details, all data concerning an individual's health.                                                    |
| <b>Personnel details</b>           | Interview notes, performance reviews / appraisals, disciplinary proceedings, training, pay reviews, grievances, comments on specific situations.           |
| <b>Communication details</b>       | Feedback, questions, notes, any data that is contained within a message body or a subject from an individual.                                              |
| <b>Criminal details</b>            | Details concerning criminal convictions.                                                                                                                   |
| <b>Technical details</b>           | IP address, browser type and version, cookies, details of website visits, Operating system, time zone and location.                                        |

Where you clock in and out, we will collect details of the dates and times you were working either by:

- Entering in your payroll number; or
- Where you have elected to do so, by using your fingerprint;

Fingerprints are categorised as biometric data and our use of it is only done where you have notified us that you wish to use this method to clock in or out. This is optional and you can choose to opt out of fingerprint scanning at any point in time.

## 4. How we collect your personal data

We will collect your personal data in the following ways:

- When you apply for a job with CEC and provide your CV;
- When you complete new starter forms and provide your right to work in the UK;
- When you sign your employment contract with us;
- When you submit holiday/leave requests;
- When you provide us with a sick note; and
- When you correspond with us via email, text, telephone or post.

We collect personal data about you when we:

- Provide you with employee training;
- Complete employee appraisals; and
- Complete disciplinarys and grievances.

## 5. Why do we process your personal data?

We are only allowed to process your personal data if we have a lawful basis to do so and are required to inform you of what that lawful basis is. We have set out in the table below: the purposes for processing your data, the categories of personal data affected, and the lawful basis on which we rely when we process your personal data.

In some circumstances we can use your personal data if it is in our legitimate interest to do so, provided that we have told you what that legitimate interest is. A legitimate interest is when we have a business or commercial reason to use your information which, when balanced against your rights, is justifiable. If we are relying on legitimate interests, we have set that out in the table below.

| Purposes for processing                                         | Categories of personal data                                                                                                                                                                                                                                 | Lawful basis for processing                                                   | Legitimate Interests (if applicable) |
|-----------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------|--------------------------------------|
| To conduct right to work checks on employees.                   | <ul style="list-style-type: none"> <li>• Identity</li> </ul>                                                                                                                                                                                                | <ul style="list-style-type: none"> <li>• Legal obligation</li> </ul>          | N/A                                  |
| To process your job application and determine role suitability. | <ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Job</li> <li>• Employment</li> <li>• Education</li> <li>• Equal Opportunities</li> </ul>                                                                                    | <ul style="list-style-type: none"> <li>• Performance of a contract</li> </ul> | N/A                                  |
| To monitor and administer your employment with CEC.             | <ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Job</li> <li>• Education</li> <li>• Leave</li> <li>• Health</li> <li>• Salary</li> <li>• Bank</li> <li>• Tax</li> <li>• Equal Opportunities</li> <li>• Personnel</li> </ul> | <ul style="list-style-type: none"> <li>• Performance of a Contract</li> </ul> | N/A                                  |

|                                                                                                                          |                                                                                                                                                               |                                                                                                           |                                                                                     |
|--------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|
| To administer payments to you in line with your employment contract and ensure payments are accurate.                    | <ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Bank</li> <li>• Tax</li> <li>• Salary</li> </ul>                              | <ul style="list-style-type: none"> <li>• Performance of a Contract</li> </ul>                             | N/A                                                                                 |
| To provide employment benefits including private medical cover.                                                          | <ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Job</li> <li>• Salary</li> </ul>                                              | <ul style="list-style-type: none"> <li>• Performance of a Contract</li> </ul>                             | N/A                                                                                 |
| To record health and safety incidents that occur while at work.                                                          | <ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Job</li> <li>• Health</li> </ul>                                              | <ul style="list-style-type: none"> <li>• Performance of a Contract</li> <li>• Legal Obligation</li> </ul> | N/A                                                                                 |
| To capture your image on our CCTV systems including body worn cameras, facial recognition and number plate registration. | <ul style="list-style-type: none"> <li>• Identity</li> </ul>                                                                                                  | <ul style="list-style-type: none"> <li>• Legitimate Interests</li> </ul>                                  | For your safety and for the prevention and detection of crime.                      |
| To generate diversity & inclusion reports and statistics                                                                 | <ul style="list-style-type: none"> <li>• Equal Opportunities</li> </ul>                                                                                       | <ul style="list-style-type: none"> <li>• Legitimate Interests</li> </ul>                                  | To maintain and promote diversity and inclusion in the workplace.                   |
| To conduct employment engagement surveys                                                                                 | <ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Job</li> <li>• Personnel</li> </ul>                                           | <ul style="list-style-type: none"> <li>• Legitimate Interests</li> </ul>                                  | To gather feedback from colleagues about their experiences in order to improve CEC. |
| When colleagues clock in and out for shifts.                                                                             | <ul style="list-style-type: none"> <li>• Identity</li> <li>• Job</li> </ul>                                                                                   | <ul style="list-style-type: none"> <li>• Performance of a contract</li> </ul>                             | N/A                                                                                 |
| To provide colleagues with online and in-person training.                                                                | <ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Job</li> <li>• Education</li> <li>• Personnel</li> <li>• Technical</li> </ul> | <ul style="list-style-type: none"> <li>• Performance of a contract</li> <li>• Legal Obligation</li> </ul> | N/A                                                                                 |
| When we capture your image to be included in marketing materials.                                                        | <ul style="list-style-type: none"> <li>• Identity</li> </ul>                                                                                                  | <ul style="list-style-type: none"> <li>• Consent</li> <li>• Legitimate Interests</li> </ul>               | To create effective marketing materials to support the business.                    |

|                                                                                                    |                                                                                                  |                                                                               |                                                                                 |
|----------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------|---------------------------------------------------------------------------------|
| To send you relevant service emails and communications regarding your employment.                  | <ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Job</li> </ul>   | <ul style="list-style-type: none"> <li>• Legitimate Interests</li> </ul>      | To ensure you are informed of updates and necessary communications effectively. |
| To provide technical support when using approved Central England Co-operative devices and systems. | <ul style="list-style-type: none"> <li>• Identity</li> <li>• Job</li> <li>• Technical</li> </ul> | <ul style="list-style-type: none"> <li>• Performance of a contract</li> </ul> | N/A                                                                             |

Special category data is personal data that is more sensitive by its nature. There will be circumstances where your special category data is required to be processed as part of your employment with CEC. Our special category condition for processing equal opportunities data is **Substantial Public Interest Conditions**: Article 9 (2)(g) of the UK General Data Protection Regulation (UK GDPR):

Your medical details are considered special category personal data under UK data protection legislation and as such, we must have a special category condition to process this information. Our special category condition that we utilise for collecting medical details is **Health and Social Care**, Article 9(2) (h). The processing is necessary for the assessment of the working capacity of the Team Member.

## 6. Do we monitor you?

We may undertake monitoring of colleagues to protect our commercial interests, to ensure a safe working environment for all colleagues, for the prevention and detection of crimes, ensuring compliance with our policies and procedures, and to comply with legal obligations. We may monitor:

- Building access;
- Usage of CEC computers, workstations, and tills;
- Email and instant messaging;
- Internet usage;
- Telephones and mobile devices;
- Audio and video recording;
- Location data (e.g., GPS location, vehicle tracking) e.g., CEC vehicle that has a tracking device installed or a CEC mobile device;

Under the Financial Conduct Authority (FCA) regulations, CEC have an obligation to ensure all colleagues undertaking funeral plan sales and/or funeral plan administrative activities are considered, what the regulations call, a 'competent employee'. To achieve this, we will routinely carry out observations, cases reviews, quality assurance checks, competency assessments and training reviews of any colleagues carrying out these activities.

## 7. Who we share your data with?

In order to administer our services and meet our legal obligations, we only share your personal data with third parties in the following circumstances:

- For the administration of IT management and support;
- For the administration of our HR portal;
- For the purpose of pre-employment checks such as references and background checks.
- To administer employee benefits such as pensions, life insurance and healthcare;
- To provide external learning platforms;
- To manage and store your personal data;
- To administer payroll, benefits and pay expense receipts; and
- To meet legal obligations, for example, for the purposes of national security, taxation and criminal investigations.

If requested, we will share your personal data with authorities such as:

- Your trade union representative;
- The Police;
- The Health and Safety Executive;
- Local Authorities;
- Her Majesty's Revenue and Customs (HMRC);
- The Courts; and
- Central or Local Government Bodies.

Before we share your personal data with a third party, we will ensure that there is an appropriate Data Processing or Data Sharing Agreement in place to protect the sharing of data.

If you are on a secondment with Central England Funeral Plans Ltd (CEC FPL) your personal data may also be shared with the CEC FPL compliance and audit teams. This is for the purpose of ensuring we are complying with the Financial Conduct Authority (FCA) regulations.

## 8. Transferring personal data outside of the EEA

The EEA is the European Economic Area, which consists of the EU Members States, Iceland, Liechtenstein and Norway. If we transfer your personal data outside of the EEA, we must tell you and we must rely on one of the following:

- **Adequacy Decision:** The country we send your personal data to provides an adequate level of protection which has been approved by the European Commission.
- **Standard Contractual Clauses (with the IDTA Addendum):** The recipient of your personal data has provided us with signed Standard Contractual Clauses with the IDTA Addendum include. This holds the recipient accountable to safeguard the personal data.
- **International Data Transfer Agreement (IDTA):** The recipient of your personal data has provided us with a signed IDTA which has been approved by the Information Commissioners Office (ICO). This holds the recipient accountable to safeguard the personal data.

Circumstances where your personal data may be transferred outside of the EEA are as follows:

## 9. How do we protect your personal data?

We take the security of your data seriously. We have internal policies and controls in place to ensure that we have implemented measures to ensure that your data is not lost,

accidentally destroyed, misused, or disclosed without our authority, and is not accessed except by our colleagues only in the performance of their professional duties. Full details are contained / can be found within the Data Protection Policy.

Where we engage third parties to process personal data on our behalf, they do so on the basis of written instructions, operate under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

## 10. Retention of your personal data?

We will normally retain your personal data for a minimum of 7 years following the end of your employment with us. We will only retain your personal data for as long as necessary to fulfil the purposes of our processing. This includes satisfying any legal, accounting, or reporting requirements.

When we assess the retention of your personal data, we will take the following into consideration:

- Nature of the information;
- Sensitivity of the information;
- Potential risks if the information was breached;
- The purpose(s) for which we initially processed the information;
- Whether we can achieve the purpose(s) through less invasive means; and
- Any applicable legal requirements.

For more detailed information about how long we retain your personal data following the end of your employment, please see our Data Retention Policy and Procedures.

## 11. Your Rights

All colleagues have data subject rights relating to the processing of their personal data. These are the rights that apply to your personal data held within CEC:

- **The right to be informed** – you have the right to know what information we hold and process about you which is why we have provided this Privacy Policy.
- **The right of access** – you have the right to ask for a copy of the information we hold regarding yourself.
- **The right to rectification** – you have the right to ask for us to correct any information we hold which may be inaccurate or incorrect.
- **The right of erasure** – you have the right to have your personal data ‘erased’ in the following situations:
  - Where the personal data is no longer required for the purpose(s) for which it was originally collected or processed;
  - Where the processing was based on consent and you have withdrawn your consent;
  - When the personal data was unlawfully processed; and

- When the personal data has to be erased in order to comply with a legal obligation.

We will erase your records when one of the above situations applies.

- **The right to object** – you have the right to object to the processing of your personal data in the following circumstances:
  - The purpose of the processing activity is direct marketing;
  - Where the processing is based on legitimate interests; and
  - Processing for the purposes of scientific/historical research and statistics.
- **The right to restriction of processing** – you have the right to ask us to restrict the processing of your personal data in certain situations such as:
  - Where you contest the accuracy of your personal data, we will restrict the processing until you have verified the accuracy of your personal data;
  - When processing is unlawful, and you oppose erasure and request restriction instead; and
  - Where we no longer need the personal data, but you require the information to establish, exercise or defend a legal claim.
- **The right to data portability** – You have the right to request that we transfer your personal data to a third-party. This right only applies to automated personal data which you have either provided your consent for us to use or where we have used your personal data to perform a contract with you.
- **Rights in relation to automated decision-making including profiling** – you have the right to question decisions being made about you without any human involvement.

If you would like to exercise any of these rights, please contact us at [enquiries@centralcoop.co.uk](mailto:enquiries@centralcoop.co.uk)

## 12. Changes to this Privacy Notice

We may update this Colleague Privacy Notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions in relation to this notice, please contact our DPO at [enquiries@centralcoop.co.uk](mailto:enquiries@centralcoop.co.uk)

## 13. Not happy?

Please let us know if you are unhappy with how we have used your personal data by contacting our DPO.

As stated in The Data (Use & Access) Act 2025, you have the right to lodge a data protection complaint with us, should you be unhappy with the way we have processed your personal data.

Your complaint will be managed and responded to by our Data Protection Officer (DPO). Their

role will be to conduct an independent investigation into the grounds for your complaint and provide an outcome to you. Your complaint will be responded to with a final written response within 30 days of receipt.

Should you wish to make a data protection complaint, this can be done by contacting the DPO in the following ways:

Email: [enquiries@centralcoop.co.uk](mailto:enquiries@centralcoop.co.uk)

If you are dissatisfied with how your data protection complaint has been managed, you also have the right to lodge a complaint with The Information Commissioner's Office (ICO). We would be grateful for the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

You can find their contact details below:

**Address:** Information Commissioner's  
Office,  
Wycliffe House,  
Water Lane,  
Wilmslow,  
Cheshire,  
SK9 5AF

**Telephone:** 0303 123 1113