

ENGLISH LACROSSE ASSOCIATION LTD
PRIVACY POLICY FOR EMPLOYEES, WORKERS
AND CONTRACTORS ("PRIVACY POLICY")

English Lacrosse Association Ltd, trading as England Lacrosse (company number 3476816) ("**EL**") is committed to protecting the privacy and security of your personal information.

This Privacy Policy describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the EU General Data Protection Regulation 2016/679 ("**GDPR**") and national laws implementing GDPR. It applies to all employees, workers and contractors.

EL is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this Privacy Policy. Our contact details are set out in the Contact section at the end of this Privacy Policy.

This Privacy Policy applies to prospective, current and former employees, workers and contractors. This Privacy Policy does not form any part of any contract of employment or other contract to provide services. We may update this Privacy Policy at any time (see "Changes to our Privacy Policy below").

It is important that you read this Privacy Policy, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

1. What is personal information?

Personal data, or personal information, means any information about an individual from which that person is identifiable. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

2. The personal information we collect

We will collect, store, and use the following categories of personal information about you:

- personal contact details such as name, title, addresses, telephone numbers, and personal email addresses;
- date of birth;
- gender;
- marital status and dependants;
- next of kin and emergency contact information;
- National Insurance number;
- bank account details, payroll records and tax status information;

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- salary, annual leave, pension and benefits information;
- start date;
- location of employment or workplace;
- copy of driving licence, passport or other identity documents;
- 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);
- performance information;
- disciplinary and grievance information;
- CCTV footage and other information obtained through electronic means e.g. swipe card records;
- information about your use of our information and communications systems;
- photographs.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- information about your race or ethnicity, religious beliefs, sexual orientation and political opinions;
- trade union membership;
- information about your health, including any medical condition, health and sickness records; and
- information about criminal convictions and offences.

3. How we collect your personal information

We collect personal information about employees, workers and contactors through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies, or where information is in the public domain.

We will collect additional personal information in the course of job-related activities throughout the period of you working for us.

4. How we use your personal information and the legal bases for this use

We process the personal data listed in section 2 for the following purposes. Some of the grounds for processing will overlap and there may be several grounds which justify our use of your personal information:

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- to make a decision about your recruitment or appointment, in accordance with our legitimate interests and/or with your consent;
- to determine the terms on which you work for us in accordance with our legitimate interests, to establish, fulfil and manage a contract between us and you and/or with your consent;
- to check you are legally entitled to work in the UK or other jurisdictions, in accordance with our legal obligations;
- to pay you and, if you are an employee, to deduct tax and National Insurance contributions to establish, fulfil and manage a contract between us and you and in accordance with our legal obligations;
- to administer any employment benefits to you to establish, fulfil and manage a contract between us and you and/or with your consent;
- to liaise with your pension provider to establish, fulfil and manage a contract between us and you and/or in accordance with our legal obligations;
- to administer the contract we have entered into with you to establish, fulfil and manage that contract;
- for business management and planning purposes, including accounting and auditing in accordance with our legitimate interests and/or our legal obligations;
- to conduct performance reviews, manage performance and determine performance requirements in accordance with our legitimate interests and to establish, fulfil and manage a contract between us and you.
- to make decisions about salary reviews and compensation in accordance with our legitimate interests and to establish, fulfil and manage a contract between us and you;
- to assess qualifications for a particular job or task, including decisions about promotions in accordance with our legitimate interests and to establish, fulfil and manage a contract between us and you;
- to gather evidence for possible grievance or disciplinary hearings to establish, fulfil and manage a contract between us and you and in accordance with our legal obligations;
- to make decisions about your continued employment or engagement in accordance with our legitimate interests and/or to establish, fulfil and manage a contract between us and you;
- to make arrangements for the termination of our working relationship in accordance with our legitimate interests and/or to establish, fulfil and manage a contract between us and you;
- to meet education, training and development requirements in accordance with our legitimate interests, our legal obligations and/or to establish, fulfil and manage a contract between us and you;
- to deal with legal disputes involving you, or other employees, workers and contractors, including accidents at work in accordance with our legal obligations;
- to ascertain your fitness to work in accordance with our legitimate interests, our legal obligations and/or to establish, fulfil and manage a contract between us and you;

- to manage sickness absence in accordance with our legitimate interests, our legal obligations and/or to establish, fulfil and manage a contract between us and you;
- to comply with health and safety obligations in accordance with our legitimate interests and/or our legal obligations;
- to prevent fraud in accordance with our legal obligations;
- to monitor your use of our information and communication systems to ensure compliance with our IT policies in accordance with our legitimate interests, our legal obligations and/or to establish, fulfil and manage a contract between us and you;
- to ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution in accordance with our legitimate interests and our legal obligations;
- to conduct data analytics studies to review and better understand employee retention and attrition rates in accordance with our legitimate interests and/or consent; and
- to monitor equal opportunities in accordance with our legitimate interests and/or our legal obligations.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Failure to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our employees).

6. How we use particularly sensitive personal information

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We are most likely to process special categories of personal information in the following circumstances:

- (1) with your explicit written consent (in limited circumstances);
- (2) where we need to carry out our legal obligations or exercise rights in connection with employment; and
- (3) where it is needed in the public interest, such as for equal opportunities monitoring.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

7. Our obligations as an employer

We will use your particularly sensitive personal information in the following ways:

- we will use information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws;
- we will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace, to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits;
- we will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting;

8. Do we need your consent?

We do not need your consent to process your personal data, including special categories of personal data, but we do need to have a legal basis for such processing (which can include consent) or be able to rely on an applicable exemption.

In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

9. Information about criminal convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our data protection policies.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We envisage that we will hold information about criminal convictions. We will only collect such information if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of you working for us.

We will use information about criminal convictions and offences for the following purposes:

- to determine suitability for volunteering, coaching or officiating applications; and
- to prevent, detect, investigate and report suspected or actual financial and/or other crime.

We are allowed to use your personal information in this way to carry out our obligations.

10. How we share your personal information

In certain circumstances we may need to share your personal information with third parties, including third-party service providers and other entities within the EL group. Details of those third parties are set out below along with the reasons for sharing it.

Where we voluntarily share your personal data with third parties, we require them to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EEA (see section 11 below). If we do, you can expect a similar degree of protection in respect of your personal information.

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

11. Transfer of your data

We will share your personal information with some third parties in the European Economic Area ("EEA"). We may pass your personal information too, or allow third parties outside the EEA to access it, such as transport and accommodation providers, international tournament/conference hosts.

To the extent that any personal information is provided to third parties outside the EEA, or who will access the information from outside the EEA, we will ensure that approved safeguards are in place, such as the approved Model Clauses or the EU/US Privacy Shield.

If you would like more information about data transfers, please contact us using the details in the Contact section below.

12. Trusted third-party service providers

We will share your personal information with third-party service providers (including contractors and designated agents).

Activities

The following activities are carried out by third-party service providers:

- payroll;
- pension administration;
- benefits provision and administration (including travel season ticket providers);
- professional advice;
- data analytics;
- IT consultancy;
- research and mailing houses; and/or
- function co-ordination.

Such third parties agree to comply with similar standards of privacy and confidentiality as those applied by EL (see section 14 below).

In order to comply with our legal obligations, we will also share your personal data with Government Agencies and Departments such as HM Revenue & Customs and, where relevant, the Health and Safety Executive and/or other regulatory bodies or law enforcement agencies.

New business owners

If we or our business merges with or is acquired by another business or company, we will share your personal information with the new owners of the business or company and their advisors. If this happens, you will be sent notice of such event.

13. How long we will hold your information

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements.

We will store certain categories of your personal information for the following periods of time*:

	Category of Personal Data	Storage time period
1	Recruitment/appointment application data (including any evidence of entitlement to work in the UK)	6 months from the date of rejection
2	Name, date of birth, contact details and other details on employee personnel file such as records relating to promotion	6 years from the date employment ends
3	Probationary period reviews (including communication/correspondence records relating to this)	6 years from the date employment ends
4	Employment benefits (including details of any interest free travel season ticket / vehicle loans provided by EL to you and eye test reimbursement)	For 7 years after the date employment ended
5	Salary, Pay Statement and Payroll details including tax, National Insurance contribution and pensions	For 7 years after the date employment ended
6	Sickness / Absence records (including in relation to annual leave, compassionate leave, volunteering leave and other types of leave referred to in Section [12] of the EL Staff Handbook. Also includes where applicable any accidents at work; medical records and/or records relating to Independent Medical Examination(s); Risk Assessments or other Assessments performed in accordance with EL's Staff Handbook and records of any alcohol or drug dependency and/or relevant treatment).	6 years from the date employment ends
7	Training records including courses and qualifications	Name, Date of Birth and Course/qualification details (including

		year and level) are held indefinitely. All other personal data collected in this category will be held for 3 years.
8	Performance review including grievance and disciplinary records (including relating to any suspension)	6 years from the date employment ends
9	Records of any alternative concurrent employment	6 years from the date employment ends
10	Details of any contractual restrictive covenants (as referred to in Section 17 of the EL Staff Handbook)	6 years from the date employment ends

* there may be a short time delay to allow for review of relevant data and for decisions to be taken as to destruction or retention.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve these purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee, worker or contractor of the company we will retain and securely destroy your personal information in accordance with our data retention policy.

14. Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

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

15. Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed in accordance with this and the relevant provisions of the EL Staff Handbook if your personal information changes during your working relationship with us.

16. Your rights on information we hold about you

You have certain rights in relation to personal information we hold about you. Details of these rights and how to exercise them are set out below. We will require evidence of your identity before we are able to act on your request.

Right of access

You have the right at any time to ask us for a copy of the personal information that we hold about you and to check that we are lawfully processing it, subject to any applicable exemptions. If we refuse your request or any element of it, we will inform you of that within the timescale for responding and indicate the reason(s) for that refusal.

Right of correction or completion

If personal information we hold about you is not accurate or is out of date and requires amendment or correction you may be entitled to have the data rectified or completed.

Right of erasure

In certain circumstances, you have the right to request that personal information we hold about you is erased e.g. if the information is no longer necessary for the purposes for which it was collected or processed or our processing of the information is based on your consent and there are no other legal grounds on which we may process the information.

Right to object to or restrict processing

In certain circumstances, you have the right to object to our processing of your personal information by contacting us using any of the methods in the Contact section below. For example, if we are processing your information on the basis of our legitimate interests and there are no compelling legitimate grounds for our processing which override your rights and interests. You also have the right to object to use of your personal information for direct marketing purposes.

You may also have the right to restrict our use of your personal information, such as in circumstances where you have challenged the accuracy of the information and during the period where we are verifying its accuracy.

Right of data portability

In certain instances, you have a right to receive any personal information that we hold about you where such information has been provided by you. If requested, such information will be provided in a structured, commonly used and machine-readable format.

You can ask us to transmit that information to you or directly to a third party organisation.

The above right exists only in respect of personal information that:

- you have provided to us previously; and
- is processed by us using automated means.

While we are happy for such requests to be made, we are not able to guarantee technical compatibility with a third party organisation's systems. We are also unable to comply with requests that relate to personal information of others without their consent.

Exercise of your rights

You can exercise any of the above rights by contacting us using any of the methods in the Contact section below.

Most of the above rights are subject to limitations and exceptions. We will provide reasons if we are unable to comply with any request for the exercise of your rights.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another

appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. You can do this by contacting us using the details in the Contact section below.

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

17. Complaints

If you are unhappy about our use of your personal information, you can contact us using the details in the Contact section below. You are also entitled to lodge a complaint with the UK Information Commissioner's Office using any of the below contact methods:

Telephone: 0303 123 11113

Website: <https://ico.org.uk/concerns/>

Post: Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

If you live or work outside of the UK or you have a complaint concerning our activities outside of the UK, you may prefer to lodge a complaint with a different supervisory authority.

18. Changes to our Privacy Policy

We reserve the right to change or update this Privacy Policy at any time. If we change our Privacy Policy in the future, we will advise you of material changes or updates by e-mail.

We may also notify you in other ways from time to time about the processing of your personal information.

19. Contact

If you have any enquires or if you would like to contact us about this Privacy Policy or our processing of your personal information, including to exercise your rights as outlined above, please contact us centrally by any of the methods below.

When you contact us, we will ask you to verify your identity.

Contact name: Kerrie Lawler

Post: England Lacrosse Association Ltd
National Squash Centre
Rowsley Street
Manchester
M11 3FF

Email: k.lawler@englandlacrosse.co.uk

Telephone: 0161 974 7757