

PRIVACY NOTICE

INTRODUCTION

ProPaye Outsourcing Ltd is committed to compliance, from being transparent about how it handles your personal information, to protecting the privacy and security of your personal information and to meeting its data protection obligations under the General Data Protection Regulation ("GDPR") and the Data Protection Act 2018.

The aim of this privacy notice is to highlight and improve the scope of awareness around how and why we will collect and use your personal information. We are required under the GDPR to notify you of the information contained in this privacy notice.

This Privacy Notice applies to the personal data of our own Employees, Recruitment Agencies Temporary Worker details, Clients (Recruitment Agencies), Suppliers, Website Users and other people whom we may contact in order to deliver our payroll and employment services to workers effectively.

It is important to point out that we may amend this Privacy Policy from time to time.

Please visit this area of our website if you want to stay up to date, as we will post any changes here. You can also contact a member of the ProPaye Outsourcing team and they will provide you with an up to date copy of our Privacy Notice. Our contact details can be found at the end of this notice and on our website under the Contact Us menu tab.

WHAT CLASSIFIES AS PERSONAL INFORMATION?

Personal information is classified as any and all information about an individual from which that person can be directly or indirectly identified. Such as:

- Name
- Identification number
- Location data (addresses etc)
- Contact information

[The above are some examples; this list is not exhaustive]

Certain personal data is deemed as "sensitive personal data" this can include the following:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Genetic data
- Biometric data
- Data concerning an individual's health
- Data concerning an individual's sex life or sexual orientation.

[The above are a few examples; this list is not exhaustive]

WHAT CATEGORIES OF PERSONAL DATA/INFORMATION DO PROPAYE OUTSOURCING COLLECT ABOUT YOU?

The data we may collect is dependent on applicable laws and requirements. It could be some, or all of the information listed below to enable us to provide you with our payroll and employment services for temporary workers.

- Name
- Age/date of birth
- Sex/gender
- Photograph
- Marital status
- Contact details; email, phone number, address
- Immigration status (whether you need a work permit)
- Nationality/citizenship/place of birth
- A copy of your Passport/Identity Card/Birth Certificate/Visa/Driving Licence ind
- Bank Details for Payroll Purpose
- National Insurance number and any other tax-related information (including proof of National Insurance Number/P45/P60 etc.
- Diversity information including racial or ethnic origin
- Details about your current remuneration, pensions and benefits arrangements
- IP address
- The dates, times and frequency with which you access our services

[Please note that the above list of categories of personal data we may collect is not exhaustive]

Client Data (Recruitment Agencies)

We collect and use information about you, or individuals within your organisation, in the course of providing you services such as: (i) finding employment for your workers and managing their payroll. We collect your data Directly from you; and from third parties (e.g. other clients who recommend we introduce ourselves and our services to you) and other limited sources (e.g. online and offline media/including social media i.e. LinkedIn). When you access our website or read or click on an email from us, we may also collect certain data automatically or through you providing it to us.

Supplier Data

We collect contact details of relevant individuals at your organisation so that we can communicate with you. We also need other information such as your bank details so that we can make payments for the services of yours that we utilise (if this is part of the contractual

arrangements between us). To the extent that you access our website or read or click on an email from us, we may also collect certain data automatically or through you providing it to us.

Website Users

The data we collect from our website users is limited and we utilise this to help manage the services we provide. This includes information that you have provided e.g. name and email address, such as how you use our website, the frequency with which you access our website and the times that our website is most popular. Our Website Hosting Provider may also collect information on how users access the Website by using a tracking ID unique to each user through the use of cookies.

What are Cookies?

A cookie is a piece of data stored on the user's computer tied to information about the user. Our Website Hosting Provider may use both session ID cookies and persistent cookies. For session ID cookies, once you close your browser or log out, the cookie terminates and is erased. A persistent cookie is a small text file stored on your computer's hard drive for an extended period of time. Your browser's help file contains information and instructions for removing persistent cookies. Session ID cookies may be used by our Website Hosting Provider to track user preferences while the user is visiting the website. They also help to minimise load times and save on server processing. Cookies used on by our Website Hosting Provider do not contain personally identifiable information.

We use Google Analytics on our website. How Google uses the data when you use our website may be found at <https://policies.google.com/privacy/partners?hl=en-GB&gl=uk> You may disable the Google Analytics function by means of a browser add-on to ensure the prevention of the sending of any analytical information to Google.

Persons whose data is received from/via our personal staff.

Referees and Emergency contact details are collected only where a member of our personal staff puts you down as their emergency contact or where an employee gives them to us in order for you to serve as a referee for them upon the interview stage of their employment.

How Do We Collect Your Personal Data?

We collect Worker personal data in three ways:

1. Personal data that you, the Worker, give to us
2. Personal data that we receive from other sources such as your agency or from HMRC regarding tax codes or attachment of earnings/remunerations.
3. Personal data that we collect automatically

We collect Client personal data in the following ways:

1. From yourselves in regard to the services we provide
2. Via third parties such as other agencies who recommend our services and provide us with your/specific individuals contact details.

3. Other limited sources such as social media, i.e. LinkedIn, Facebook, directories, or your websites.

We collect Supplier personal data in the following ways:

1. From yourselves in relation to us utilising your services such as contact information to communicate with you, bank details to pay your for your services.
2. Other limited sources such as social media, i.e. LinkedIn, Facebook, directories, or your websites.

Personal data you give to us

ProPaye Outsourcing Ltd needs to know certain information about you in order to provide a tailored service. This will enable us to provide you with the best service possible.

There are numerous ways you can share your information with us, these include:

- Practically all worker personal data, such as name, bank details, pre-established contact information and national insurance number is provided to ProPaye via the agency who acquires it from the worker directly with the sole purpose being for us to be the end receiver for the provision of payroll and employment services.
- Workers can contact us directly to update any information they believe we have via our Update Data process which is available to them.
- Primarily staff personal data, such as their name, CV data and bank details is provided to us by the individual themselves so that they can be set up as employee, be paid for their work and have aspects of their employment with ProPaye effectively managed.

Personal data we receive from other sources

We also receive personal data about Workers from other sources. Depending on the relevant circumstances and applicable local laws and requirements, these may include personal data received in the following situations:

- Our Clients (Recruitment Agencies) may share personal information about you with us
- Agencies provide us with all necessary personal data required to manage your payroll and employment upon the start of your business relationship with ProPaye Outsourcing.
- If you 'like' our page on Facebook or 'follow' us on Twitter we will receive your personal information from those sites
- Agencies will also provide us with certain sensitive personal data, such as sick notes or maternity information for ProPaye to be able to action certain statutory payments to you.
- HMRC will provide us with information regarding tax codes and attachment of orders so that the net pay you received is accurate.

Personal data we collect automatically

To the extent that you access our website or read or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may also collect your data automatically or through you providing it to us.

CLIENT DATA

We collect Client personal data in three ways:

1. Personal data that we receive directly from you, such as email addresses, contact numbers and name etc.
2. Personal data that we receive from other sources
3. Personal data that we collect automatically

It is always our aim to make sure that your workers receive accurate and timely payroll and suitable employment services.

We will receive data directly from you in two ways:

- Where you contact us proactively, usually by phone or email
- Where we contact you, either by phone or email, or through our sales department business development or service activities.

Personal data we receive from other sources

Where appropriate and in accordance with any local laws and requirements, we may seek more information about you or your colleagues from other sources generally by way of due diligence or other market intelligence including:

- From third party market research and by analysing online and offline media (which we may do ourselves, or employ other organisations to do for us)
- From delegate lists at relevant events
- From other limited sources and third parties

Personal data we collect via our website

To the extent that you access our website or read or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may also collect your data automatically or through you providing it to us.

Website Users:

When you visit our website, there is certain information that we may automatically collect, whether or not you decide to use our services. This includes your IP address, the date and the times and frequency with which you access the website and the way you browse its content. We will also collect data from you when/if you contact us via the website.

Why and How do we use your personal data?

We will only use your personal information when the law allows us to. These are known as the legal bases for processing. We will use your personal information in one or more of the following circumstances:

- Where we need to do so to take steps at your request prior to entering into a contract with you, or where we need to do so to perform the payroll and employment services for your workers.
- Where we need to comply with a legal obligation
- Where it is necessary for our legitimate interests (or those of a third party), and your interests or your fundamental rights and freedoms do not override our interests.

We may also occasionally use your personal information where we need to protect your vital interests (or someone else's vital interests).

We need all the types of personal information listed under "*What types of personal information do we collect about you?*" primarily to enable us to take steps at your request to enter into a contract with you, to suitably provide employment and payroll services for your workers, and to enable us to comply with our legal obligations. In some cases, we may also use your personal information where it is necessary to pursue our legitimate interests (or those of a third party), provided that your interests or your fundamental rights and freedoms do not override our interests. Our legitimate interests include: pursuing our business by employing employees, workers and contractors; managing the recruitment process; conducting due diligence on prospective staff and performing effective internal administration.

WORKER DATA

The purposes for which we are processing, or will process, your personal information is to:

- Comply with statutory and/or regulatory requirements and obligations, e.g. checking your right to work in the UK
- Ensure compliance with your statutory rights
- Ensure effective personnel management and business administration
- Enable us to establish, exercise or defend possible legal claims
- Maintain an accurate record of your employment or engagement terms
- Deliver the service we are contractually engaged to deliver for you
- Ensure you are paid correctly and receive the correct pension entitlements, including liaising with any external pension providers

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

What if you fail to provide personal information?

If you fail to provide certain personal information when requested or required, we may not be able to perform the services we have been engaged or we may be prevented from complying with our legal obligations. You may also be unable to exercise your statutory or contractual rights.

Client Data

We use your data to maintain efficient and effective communication regarding the payroll and employment services we provide to your workers.

To maintain the effective running of the business through contractual agreements and to comply with legal obligations.

Supplier Data

To maintain the effective running of the business through contractual agreements and to comply with legal obligations.

Persons whose data we receive from workers and staff

The personal details of a Staff member's emergency contacts in the case of an accident or emergency affecting that member of Staff.

Via our payroll and employment services, workers occasionally provide a relative or friends personal details such as bank account information or phone number if their own is unsuitable/unavailable.

Website Users

We use your data to help us to improve our service, for example if you are a Worker or Client of ProPaye Outsourcing, we may use data from your use of our websites to enhance other aspects of our communications with, or service to, you.

WHO DO WE SHARE YOUR PERSONAL DATA WITH?

Worker Data

Your personal information may be shared internally within the Company for the purposes of payroll and employment services, including with members of the accounts department, members of the payroll team, managers in the department which runs the payroll and employment service and IT staff if access to your personal information is necessary for the performance of their roles.

The Company will not share your personal information with third parties during the provision of our service unless it is deemed required to ensure it is delivered to the promised standard. Consent will always be requested from the necessary individuals prior to sharing any personal data as otherwise this would be seen as a breach of GDPR. At that stage, we may also share

your personal information with third parties including: External organisations for the purposes of ensuring every aspect of our payroll and employment service is delivered accurately.

- HMRC or gov services for tax code information/queries and attachment order/remuneration information.
- Professional advisors, such as lawyers

We may also need to share your personal information with a regulator or to otherwise comply with the law.

We may share your personal information with third parties where it is necessary to take steps at your request to enter into a contract with you, where we need to do so to perform the payroll and employment services for you, or where we need to comply with a legal obligation, or where it is necessary for our legitimate interests (or those of a third party).

Client Data:

We will share your data within our own company for necessary communication and with your consent for testimonial purposes where you will be referenced by name on our website and in material provided to potential new clients. we will share your data with our chosen bank for financial purposes.

Supplier Data:

Unless you specify otherwise, we may share your information with any of associated third parties such as our service providers and organisations to whom we provide services.

Persons whose data is received from workers and staff.

It is unlikely that ProPaye Outsourcing Ltd will be required to share your data with anyone external to our company such as associated third parties i.e. our service providers or organisations to whom we provide services.

Website Users:

Unless you specify otherwise, we may share your information with providers of web analytics services, marketing automation platforms and social media services to make sure any advertising you receive is targeted to you.

HOW DO WE SAFEGAURD YOUR PERSONAL DATA

ProPaye Outsourcing Ltd has put in place measures to protect the security of your personal information. It has internal policies, procedures and controls in place to try and prevent your personal information from being accidentally lost or destroyed, altered, disclosed or used or accessed in an unauthorised way. In addition, we limit access to your personal information to those employees, workers, agents, contractors and other third parties who have a business need to know in order to perform their job duties and responsibilities. You can obtain further information about these measures from our Compliance Manager and DPO who can be contacted via email on courtney.hastings@propaye.co.uk

Where your personal information is shared with third parties, we require all third parties to take appropriate technical and organisational security measures to protect your personal

information and to treat it subject to a duty of confidentiality and in accordance with data protection law. We only allow them to process your personal information for specified purposes and in accordance with our written instructions and we do not allow them to use your personal information for their own purposes.

ProPaye Outsourcing Ltd also has in place procedures to deal with a suspected data security breach and we will notify the Information Commissioner's Office (or any other applicable supervisory authority or regulator) and you of a suspected breach where we are legally required to do so.

HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?

ProPaye Outsourcing will only retain your personal information for as long as is necessary to fulfil the purposes for which it was collected and processed.

ProPaye Outsourcing Ltd only require your personal data for us to be able to provide payroll and employment services for an agencies workers, to manage your employment as an employee of ProPaye, or to fulfil a contractual agreement of services via communication regarding said services and for payment for said services. But this is subject to: (a) any minimum statutory or other legal, tax, health and safety, reporting or accounting requirements for particular data or records, and (b) the retention of some types of personal information for up to six years to protect against legal risk, e.g. if they could be relevant to a possible legal claim in a tribunal, County Court or High Court.

If you are utilising ProPaye Outsourcing/are in a business relationship with ProPaye Outsourcing, personal information gathered during the provision of said services/relationship will be retained for the duration of your employment or engagement and in accordance with the privacy notice for employees, workers and contractors.

Personal information which is no longer to be retained will be securely and effectively destroyed or permanently erased from our IT systems and we will also require third parties to destroy or erase such personal information where applicable.

In some circumstances we may anonymise your personal information so that it no longer permits your identification. In this case, we may retain such information for a longer period.

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

YOUR RIGHTS IN CONNECTION WITH YOUR PERSONAL INFORMATION

As a data subject, you have a number of statutory rights. Subject to certain conditions, and in certain circumstances, you have the right to:

- Request access to your personal information – this is usually known as making a data subject access request and it enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it
- Request rectification of your personal information – this enables you to have any inaccurate or incomplete personal information we hold about you corrected

- Request the erasure of your personal information – this enables you to ask us to delete or remove your personal information where there's no compelling reason for its continued processing, e.g. it's no longer necessary in relation to the purpose for which it was originally collected
- Restrict the processing of your personal information – this enables you to ask us to suspend the processing of your personal information, e.g. if you contest its accuracy and so want us to verify its accuracy
- Object to the processing of your personal information – this enables you to ask us to stop processing your personal information where we are relying on the legitimate interests of the business as our legal basis for processing and there is something relating to your particular situation which makes you decide to object to processing on this ground
- Data portability – this gives you the right to request the transfer of your personal information to another party so that you can reuse it across different services for your own purposes.

If you wish to exercise any of these rights, please contact the office in writing or email your request by using the contact information at the end of this notice and on our website under the Contact Us menu tab. We may need to request specific information from you in order to verify your identity and check your right to access the personal information or to exercise any of your other rights. This is a security measure to ensure that your personal information is not disclosed to any person who has no right to receive it.

In the limited circumstances where you have provided your consent to the processing of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. This will not, however, affect the lawfulness of processing based on your consent before its withdrawal. If you wish to withdraw your consent, please contact the office by using the contact information at the end of this notice and on our website under the Contact Us menu tab to email your request. Once we have received notification that you have withdrawn your consent, we will no longer process your personal information for the purpose you originally agreed to, unless we have another legal basis for processing.

If you believe that ProPaye Outsourcing Ltd has not complied with your data protection rights, you have the right to make a complaint to the Information Commissioner's Office (ICO) at any time. The ICO is the UK supervisory authority for data protection issues.

WHY AND HOW DO WE USE YOUR SENSITIVE PERSONAL DATA/INFORMATION?

We will only collect and use your sensitive personal information, which includes special categories of personal information and information about criminal convictions and offences, when the law allows us to.

Some special categories of personal information, i.e. information about your health, and information about criminal convictions and offences, is processed so that we can perform or exercise our obligations or rights under employment law and in line with our data protection policy.

We may also process information about your health and information about any criminal convictions and offences where we have your explicit written consent. In this case, we will first provide you with full details of the personal information we would like and the reason we need it, so that you can properly consider whether you wish to consent or not. It is entirely your choice whether to consent. Your consent can be withdrawn at any time.

The purposes for which we are processing, or will process, health information and information about any criminal convictions and offences, are to:

- Assess your suitability for employment or engagement
- Comply with statutory and/or regulatory requirements and obligations, e.g. carrying out criminal record checks
- Comply with the duty to make reasonable adjustments for disabled job applicants and with other disability discrimination obligations
- Ensure compliance with your statutory rights
- Ascertain your fitness to work
- Ensure effective HR, personnel management and business administration
- Monitor equal opportunities

Where the Company processes other special categories of personal information, i.e. information about your racial or ethnic origin, religious or philosophical beliefs and sexual orientation, this is done only for the purpose of equal opportunities and in line with our data protection policy. Personal information that the Company uses for these purposes is either anonymised or is collected with your explicit written consent, which can be withdrawn at any time. It is entirely your choice whether to provide such personal information.

We may also occasionally use your special categories of personal information, and information about any criminal convictions and offences, where it is needed for the establishment, exercise or defence of legal claims.

WHAT IF YOU FAIL TO PROVIDE PERSONAL DATA/INFORMATION?

If you fail to provide certain personal information when requested, we may not be able to provide suitable payroll and employment services properly or at all, we may not be able to enter into a contract with you, or we may be prevented from complying with our legal obligations. You may also be unable to exercise your statutory rights.

TRANSFERRING PERSONAL DATA/INFORMATION OUTSIDE THE EUROPEAN ECONOMIC AREA

ProPaye Outsourcing Ltd will not transfer your personal information to countries outside the European Economic Area.

CHANGE OF PURPOSE

We will only use your personal information for the purposes for which we collected it, i.e. for us to be able to provide payroll and employment services for an agencies workers, to

manage your employment as an employee of ProPaye, or to fulfil a contractual agreement of services via communication regarding said services and for payment for said services.

We do not envisage any change of purpose; however, we will ask for your consent before we keep your personal information on file for this purpose. Your consent can be withdrawn at any time.

AUTOMATED DECISION MAKING

We do not envisage that any payroll decisions will be taken about you based solely on automated decision-making.

MARKETING ACTIVITIES

We will only ever send you information which is relevant/necessary for us to be able to provide payroll and employment services for an agencies workers, to manage your employment as an employee of ProPaye, or to fulfil a contractual agreement of services via communication regarding said services and for payment for said services.

Therefore, we may use your data for the purposes listed below, where appropriate and in accordance with any local laws and requirements. **Please note that this list is not exhaustive:**

- To enable us to develop and market other products and services
- To assess our commitment to quality and continual improvement
- Market our full range of services available to you as our offering grows with the natural progression of the company
- Send you details of reports, promotions, offers, networking and client events, and general information about the industry sectors which we think might be of interest to you, especially in regard to spotlight cases and matters of a compliance nature.
- Display promotional excerpts from your details on ProPaye Outsourcing Ltd website, LinkedIn Page or Facebook Page as a success story (only where we have obtained your express consent to do so).
- Provide you with information about certain discounts and offers that you are eligible for by virtue of your relationship with ProPaye Outsourcing

We need your consent for some aspects of these activities which are not covered by our legitimate interests and depending on the situation, we'll ask for consent for this. Please note that we will comply with any additional local law requirements.

CHANGES TO THIS PRIVACY NOTICE

The Company reserves the right to update or amend this privacy notice at any time.

Please visit this area of our website if you want to stay up to date, as we will post any changes here. You can also contact a member of the ProPaye Outsourcing team and they will provide you with an up to date copy of our Privacy Notice.

CONTACT A MEMBER OF OUR TEAM:

Email: info@propaye.co.uk

Call: 01543 220 903

OR our Compliance Manager (DPO) courtney.hastings@propaye.co.uk