

Leaver Privacy Notice

This privacy notice explains what data is collected about you, and why, as an employee of the XPS Pensions Group plc. This privacy notice is for employees who are leaving the business.

Who is the data controller?

A data controller is the person or organisation who determines what data to collect from you and how to use that data. A data controller is legally responsible for your data.

The data controller is your employer, Xafinity Consulting Ltd, as set out in your contract of employment.

The contact address is:

Phoenix House, 1 Station Hill, Reading, RG1 1NB

When we refer to 'we' and 'us' in this notice, we mean your employer.

What is the law?

The General Data Protection Regulation (GDPR) is the governing legislation for collecting and processing personal data.

We collect and process personal data relating to our employees to manage the employment relationship. We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations.

What information does the organisation hold?

The organisation holds a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number, date of birth and gender;
- the terms and conditions of your employment;
- details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with the organisation;
- information about your remuneration, including entitlement to benefits such as pensions or insurance cover;
- details of your bank account and national insurance number;
- information about your marital status, next of kin, dependants and emergency contacts;
- information about your nationality and entitlement to work in the UK;
- information about your criminal record (where applicable);

- details of your schedule (days of work and working hours) and attendance at work;
- details of periods of leave taken by you, including holiday, sickness absence, family leave and sabbaticals, and the reasons for the leave;
- details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence;
- assessments of your performance, including appraisals, performance reviews and ratings, performance improvement plans and related correspondence;
- information about medical or health conditions, including whether or not you have a disability for which the organisation needs to make reasonable adjustments; and
- equal opportunities monitoring information including information about your ethnic origin, sexual orientation and religion or belief.

Data will be stored in a range of different places, including in your employee file, in the organisation's HR management systems and in other IT systems (including the organisation's email system).

Who has access to data?

After the end of your employment, any paper copies of your information will be held securely in an off-site archiving facility, and electronic information will continue to be held securely.

Your information may be shared with internal and external auditors, if access to the data is necessary for performance of their roles.

The organisation shares your data with third parties in order to respond to pre-employment reference requests from your new employer. In those circumstances the data will be subject to confidentiality arrangements.

The organisation will not transfer your data to countries outside the European Economic Area.

How does the organisation protect data?

We take the security of your data seriously and we have formal, documented Information Security and Data Protection policies (available on Xone) that set out the security measures currently implemented and maintained. These core policies are supported by additional policies covering:

- Data retention
- Data encryption (using 256AES encryption)

- Physical security
- Data sharing and third party requests (including DWP, Police etc)
- Acceptable usage (e.g. email, internet facilities, telephone)

These policies and controls are in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by people in the performance of their duties.

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

For how long does the organisation keep data?

The periods for which your data is held after the end of employment are set out below.

All personal data & files (inc sensitive personal information & redundancy)	6 years after employment ends
Payroll / wages (including overtime and bonuses) / expenses	6 years from year end
Retirement benefits, incapacity, pension accounts and scheme records	6 years from end of scheme year or accounts completed
"Right to Work" documents	2 years after employment ends

Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the organisation to change incorrect or incomplete data;
- require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- object to the processing of your data where the organisation is relying on its legitimate interests as the legal ground for processing - meaning we believe we have a good business reason for processing your data - please refer to page 2 of this document for a list of reasons where we would have a legitimate interest in processing your data.

The above rights are always subject to a right for us to keep your data so as to be able to defend any future legal claims.

If you would like to exercise any of these rights, please contact HR.

If you believe that the organisation has not complied with your data protection rights, you can complain to the Information Commissioner.

Where can you get an up to date copy of this notice?

We will ensure that a copy of all of our privacy notices are regularly updated and can be provided to you upon request.