



Purmo Group (UK) Ltd
GDPR Privacy Policy

Our Privacy Policy – your rights, your information and how we use it

Purmo Group (UK) Ltd is committed to protecting your personal information. Our Privacy Policy contains important information about what personal details we collect, what we do with that information, who we may share it with and why and your choices and rights when it comes to the personal information you have given us.

The personal information we collect relates to employees, customers and suppliers.

We may need to make changes to our Privacy Policy and will provide updates on this matter from time to time. If there are important changes such as changes to where your personal data will be processed, we will contact you to let you know.

Information we collect and use

1. The Company needs to keep and process information about its employees for normal employment purposes. The information we hold and process will be used for management and administrative use only. We will keep and use it to enable us to run the business and manage our relationship with our employees effectively, lawfully and appropriately, during the recruitment process, whilst employees are working for us, at the time when employment ends and after employees have left the business. This includes using information to enable us to comply with an employment contract, any legal requirements, pursuing the legitimate interests of the Company and to protect our legal position in the event of legal proceedings. If an employee does not provide this data, we may be unable to comply with our obligations and if this happens, we will tell the employee about the implications of that decision.
2. Much of the information we hold on employees has been provided by the employee, however some of it may have come from other internal sources, such as a Line Manager, or in some cases, external sources, such as referees or the pension scheme administrators.
3. The sort of information we hold on employees includes an application form or CV, employment references, contract of employment and any amendments to it, correspondence with or about the employee (for example a letter to a mortgage company at the employees request to confirm salary and start date or a reference to be a guarantor for a property), information needed for payroll, any benefits or expenses the employee may be entitled to, pension scheme information, contact and emergency contact details, information on any medical conditions or allergies the employee may have that would be needed in an emergency, details of any criminal convictions, records of holidays, sickness and other absence, records relating to career history such as training records, appraisals or other performance measures and where appropriate, disciplinary and grievance records.
4. Where necessary, we may keep information on employees relating to their health, which could include reasons for absence and GP reports and notes. This information will be used in order to comply with our Health and Safety and occupational health obligations; to consider how the employee's health affects their ability to do their job and whether any adjustments to their job might be appropriate. We also need this data to administer and manage statutory and company sick pay and the life insurance policy linked to the Purmo Group UK Pension Scheme.
5. In addition, we may monitor computer and mobile telephone use for employees, as outlined in the Purmo Group (UK) Ltd ICT Security Manual. We also keep records of employee hours of work by way of the company time and attendance system, which also serves as a record for fire and evacuation.

6. We will only disclose information about employees to third parties if we have their written consent to do so or where we are legally obliged/need to comply with our contractual duties. For instance, we may need to pass on certain information to our external payroll provider, pension scheme administrators or government bodies. We will also disclose information to third party providers at the employee's own request and when provided with a copy of their written consent, for example, to a mortgage provider who the employee asks to contact the business for confirmation of their personal details such as start date with the business and salary.
7. The Company needs to keep and process information about its customers and suppliers for legal reasons in order to conduct business. The information we hold and process for customers and suppliers will be used for management and administrative use only. We will keep and use it to enable us to run the business and manage our relationship with customers and suppliers effectively, lawfully and appropriately.
8. The information we hold on customers and suppliers is provided by them in order for them to be able to do business and transact with Purmo Group (UK) Ltd.
9. Where we process any data with the consent of the employee, customer or supplier, they have the right to withdraw that consent at any time.
10. We will only disclose information about customers or suppliers to third parties where we have their written consent to do so.
11. We may transfer information about employees to other group companies for purposes connected with their employment or the management of the company's business.
12. If in the future we intend to process an employee, customer or supplier's personal data for a purpose other than that which it was collected for, we will provide them with information on that purpose and any other relevant information.

We take the privacy of our employees, customers and suppliers very seriously and we will only ever collect and use personal information where it is necessary, fair and lawful to do so.

Who we may share information with?

We may share employee information with third parties for the reasons outlined in "Information we collect and use".

These third parties include:

- Pension scheme administrators (Standard Life and KPMG); in order for them to provide pension scheme services for the Purmo Group UK Ltd Pension Scheme
- HM Revenue & Customs (HMRC) e.g. for the processing of tax codes, pension payments and earnings information
- Statutory bodies such as the CSA, Child Maintenance Services or local regulatory authorities for the processing of deductions of earnings orders
- Mortgage providers or property letting agencies for the processing of earnings and employment details where an employee needs formal confirmation of their employment details from the Company

We do not share supplier information with third parties. Where there is ever a need to do so, we will discuss this with the relevant supplier and get their consent before passing any of their details to third parties.

On occasions we do share customer information with third parties, however this will normally only extend to PR/case studies carried out by Purmo Group (UK) Ltd. Purmo Group (UK) Ltd may pass customer information to an editor of a trade publication for details to be included in their publication, however consent is obtained from the customer prior to any information being passed to the trade press.

We will never sell employee, customer or supplier details to someone else. Whenever we share information, we will do so in line with our obligations to keep information safe and secure at all times.

Where information is processed

The information we hold will be processed in the UK and European Economic Area (EEA). We do not process information outside of the EEA.

How we protect information

We take information and system security very seriously and we strive to comply with our obligations at all times. Any employee, customer or supplier information which is collected, recorded or used in any way, whether on paper, online or any other media, will have appropriate safeguards applied in line with our data protection obligations. The information we hold is protected by controls designed to minimise loss or damage through accident, negligence or deliberate actions. We also protect sensitive or confidential information when storing or transmitting information electronically (please refer to the ICT Security Manual Purmo Group (UK) Ltd, dated June 2019).

Our security controls provide a control environment that effectively manages risk to the confidentiality, integrity and availability of information.

How long we keep information

We will keep and process information only where it is necessary for normal employment or trading purposes. We may also keep information after this period but only where required to meet our legal or regulatory obligations. The length of time we keep information for these purposes will vary depending on the obligations we need to meet.

Your individual rights

You have several rights in relation to how Purmo Group (UK) Ltd uses your information. They are:

Right to be informed

You have a right to receive clear and easy to understand information about the information we have, why and who we share it with –we do this in our Privacy Policy.

Right of access

You have the right of access to your information. If you wish to receive a copy of the information we hold on you, you may make a data subject access request (DSAR).

Right to request that your personal information be rectified

If the information we hold about you is inaccurate or incomplete, you can request that it is corrected.

Right to request erasure

You can ask for your information to be deleted or removed if there is not a compelling reason for Purmo Group (UK) Ltd to continue to have it.

Right to restrict processing

You can ask that we block or suppress the processing of your information for certain reasons. This means that we are still permitted to keep your information but only to ensure we don't use it in the future for those reasons you have restricted.

Right to data portability

You can ask for a copy of your information for your own purposes to use for a particular reason. In certain circumstances, you may move, copy or transfer the personal information we hold to another company in a safe and secure way. For example, if an employee decides to move their pension to another pension provider.

Right to object

You can object to Purmo Group (UK) Ltd processing your information where; it is based on our legitimate interests, for direct marketing and if we were using it for historical research and statistics.

Contact Details

If you have any questions about this Privacy Policy or would like to exercise your rights in respect of your data, please contact the Company using the following contact details:

The HR Department
Purmo Group (UK) Ltd
Eastern Avenue
Team Valley Trading Estate
Gateshead
Tyne and Wear
NE11 0PG

What if you have a complaint?

If you would like to make a complaint about how we have handled your information, please contact us using the details above. If you are not satisfied with our response to your complaint or believe our processing of your data does not comply with data protection law, you can make a complaint to the Information Commissioner's Office. Its contact details are:

Information Commissioner's Office , Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. Telephone: 01625 545 745.