CRESTBRIDGE

EMPLOYEE PRIVACY NOTICE

This Employee Privacy Notice sets out how Crestbridge collects and handles personal information about you when you work for Crestbridge on a voluntary or paid basis and whether that work is undertaken as an employee, contractor, secondee or work experience student.

We take the privacy and security of your personal information very seriously and will only use your personal information as set out in this Employee Privacy Notice or as we may otherwise inform you from time to time.

As an employee, contractor, secondee or work experience student then the Controller of your personal information will be the Crestbridge group company with which either you, or the organisation that you work for in the case of a contractor, has a contractual relationship with (e.g. a contract of employment or consultancy agreement). If you are a work experience student, then it will be the Crestbridge group company which has agreed to offer you work experience.

The name and contact details of the Crestbridge Controller of your personal information can be found on the relevant contract detailed above or are also available upon request by contacting Crestbridge Human Resources at hrgroup@crestbridge.com

"Crestbridge", "we", "us", "our" in this Employee Privacy Notice are references to the relevant Crestbridge Controller.

Crestbridge has an appointed Data Protection Officer: who can be contacted at The Data Protection Officer, Crestbridge Group Services Limited, 47 Esplanade, St. Helier, Jersey JE1 0BD, Channel Islands, or by email: dpo@crestbridge.com

Crestbridge collects and processes personal information relating to the persons who work for it in order to manage the employment relationship. Crestbridge is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

What information does Crestbridge collect and why?

Crestbridge collects and/or processes a range of information about you for various purposes.

This may include the following personal data:

Information	Purpose	Primary Legal Basis
Your name, title, address and identification documentation such as passport or driving licence and recent utility bill or bank statement.	To identify you and enable Crestbridge to offer and provide you with a contract and undertake any necessary screening checks.	Contract and Legal Obligation
Your email address and telephone number.	To enable Crestbridge to communicate with you and offer and provide you with a contract.	Contract
Date of birth and gender.	To comply with employment legislation and equal opportunities and anti-discrimination legislation.	Legal Obligation
Terms and conditions of your employment.	To comply with employment legislation.	Legal Obligation

Your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with Crestbridge.	To ensure you are appropriately qualified and experienced for the job and/or to help facilitate any employee screening checks required.	Legitimate Interests and Legal Obligations
Remuneration and tax details, including entitlement to benefits such as pensions or insurance cover.	To comply with contractual requirements and employment, tax and social security legislation.	Contract and Legal Obligation
Bank account details.	To comply with contractual requirements.	Contract
National insurance or social security number (or regional equivalent).	To comply with employment, tax and social security legislation.	Legal Obligation
Marital status, next of kin, dependants.	To comply with contractual requirements including as regards to benefits.	Contract
Emergency contacts.	To ensure in the event of an emergency we know who to contact.	Vital Interests
Nationality and entitlement to work in the jurisdiction in which you are employed.	To comply with applicable immigration and licensing laws.	Legal Obligation
Information about whether you are an undischarged bankrupt, or have an arrangement with creditors or other external administration.	To ensure you are appropriately qualified for the job and/or to help facilitate any employee screening checks required.	Legal Obligation
Information about any act, neglect or default which would not allow you to be a member of any professional institute;		Legal Obligation
Details of your schedule (days of work and working hours) and attendance at work;	To comply with contractual requirements including as to holiday, flexible/agile working.	Contract
Information gathered from your use of our IT hardware, platform, systems, and network which may include login and log-off information, your electronic or telephonic correspondence whilst using our systems, file and folder access and edit information, printer/scanner/copier usage information, electronic office entry system information, CCTV image, photographic	To prevent fraud, for the prevention, detection, investigation and prosecution of any other unlawful acts, and compliance with staff policies and procedures. CCTV imagery may also be collected for health and safety purposes. Electronic or telephonic correspondence may include business correspondence (so	Legal Obligations (to prevent certain criminal actions which may include bribery, tax evasion, money laundering or fraud); and/or Legal Obligations - regulatory (where electronic or telephonic correspondence is "business correspondence"); and/or Legitimate Interests; and/or

image, digital signatures, and image and audio on certain electronic meeting platforms.	typically correspondence regarding clients) or be processed to establish, exercise or defend legal claims.	To Establish, Exercise or Defend Legal Claims.
Leave taken by you, including holiday, sickness absence, family leave, study leave, secondments and sabbaticals and the reasons for the leave.	To facilitate the administration of your contractual rights and obligations and comply with any applicable employment law.	Contract and Legal Obligations
Details of any grievances you have raised or otherwise spoken-up about to bring to our attention.	To address these as per Crestbridge's legal obligations under employment and other applicable laws.	Legal Obligations
Details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence.	To comply with employment legislation.	Legal Obligations
Training you have, are or will be participating in as well as reports from training providers, mock exam results and actual exam results for professional qualifications.	To comply with any contractual obligations and address applicable regulatory (such as data protection and money laundering) laws regarding staff training and continuous professional development.	Contract and Legal Obligations
Assessments of your performance, including appraisals, performance reviews and ratings, performance improvement plans and related correspondence.	To ensure you are performing appropriately, to assess pay and fitness for promotion, discretionary bonus, LTIP entitlement, and meet contractual requirements.	Legitimate Interests and Contract

It may also include the following special category / sensitive personal data:

Information	**Purpose**	**Legal Basis**
Criminal Record.	As a regulated business Crestbridge is obliged to screen its employees, including undertaking criminal record checks.	Legal Obligation
Medical / Health (including disabilities or maternity/paternity).	To comply with employment legislation and equal opportunities and anti-discrimination legislation.	Legal Obligation and Vital Interests
Details of any trade union memberships held.	To check off for union subscriptions / attendance.	Legal Obligation
Ethnic origin.		Consent

Sexual orientation.	To comply with equal opportunities and anti-discrimination legislation.	
Religious or philosophical beliefs.	To facilitate religious beliefs and comply with equal opportunities and anti-discrimination legislation.	

As per the tables, Crestbridge typically needs to process your personal data to enter into an employment or consultancy contract with you (or the organisation you work for if you are a consultant) and to meet its obligations under such a contract. For example, it needs to process your data to provide you with a contract, to pay you in accordance with the contract and to administer your benefits such as pension and insurance entitlements and health and dental insurance.

In some cases, Crestbridge needs to process personal data to ensure that it is complying with its legal obligations. For example, it is required to check an employee's entitlement to work in our jurisdictions, to deduct tax, to comply with local health and safety laws, equal opportunity and anti-discrimination legislation, and to enable employees to take periods of leave to which they are entitled. For certain positions, it is necessary to carry out criminal records checks to ensure that individuals are permitted to undertake the role in question.

In other cases, Crestbridge has a legitimate interest in processing personal data before, during and after the end of the employment relationship, and may also process personal data in certain cases for the prevention, detection, investigation and prosecution of an unlawful act or in the wider public interest.

Processing employee data allows Crestbridge to, amongst other things:

- run recruitment and promotion processes;
- maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency), and records of employee contractual and statutory rights;
- operate and keep a record of disciplinary, grievance and speak-up processes, to ensure acceptable conduct within the workplace (including compliance with Crestbridge's staff and other related policies and procedures (eg. confidentiality, acceptable use, information security));
- operate and keep a record of employee performance, to include professional exam results and related processes, to plan for career development, and for succession planning and workforce management purposes;
- operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled;
- obtain occupational health advice, to ensure that it complies with duties in relation to individuals with disabilities, meet its obligations under health and safety law, and ensure that employees are receiving the pay or other benefits to which they are entitled;
- operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to allow effective workforce management, to ensure that Crestbridge complies with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled;
- maintain ongoing and long term benefits such as your pension;
- maintain the integrity and security of our offices and our IT hardware, platform, systems and network to help prevent and detect unlawful acts (eg. cyber and phishing attacks and fraud);
- ensure effective general HR and business administration;
- provide references on request for current or former employees;
- respond to and defend against legal claims;
- maintain and promote equality in the workplace; and
- to meet regulatory requirements.

Where Crestbridge relies exclusively on legitimate interests as a lawful basis for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of employees or workers and has concluded that they are not and you have a right to object to and challenge Crestbridge's assessment.

Some special categories of personal data, such as information about health or medical conditions, is processed to carry out employment law obligations (such as those in relation to employees with disabilities and for health and safety purposes), or in exceptional cases where it is processed in your or another person's vital interests (where consent cannot reasonably be expected to be obtained) or where it is in the substantial public interest provided for by law and subject to appropriate safeguards. Information about trade union membership is processed to allow Crestbridge to operate check-off for union subscriptions.

Where Crestbridge processes other special categories of personal data, such as information about ethnic origin, sexual orientation, religious or philosophical beliefs, this is done for the purposes of equal opportunities monitoring. Data that Crestbridge uses for these purposes is anonymised or is collected with the express consent of employees, which can be withdrawn at any time. Employees are entirely free to decide whether or not to provide such data and there are no consequences of failing to do so.

How does Crestbridge collect it?

Crestbridge collects this information in a variety of ways. For example, data is collected through CVs or resumes; obtained from your passport or other identity documents such as your driving licence; from forms completed by you at the start of or during employment (such as your Personal Details Form); from the monitoring of our IT hardware, platform, systems and network (including, without limitation, our email system, our CCTV systems, telephone system, printer/scanner/copiers, and electronic office entry systems); from correspondence with you; from third party professional education providers or through interviews, meetings or other assessments.

In some cases, Crestbridge collects personal data about you from third parties, such as references supplied by former employers, information from employment background check providers, information from credit reference agencies, information from our Speak-Up service provider (where you or someone else has provided information that identifies you or renders you identifiable), and information from criminal records checks permitted by law.

Data is stored in a range of different places, including in your personnel file, in Crestbridge's HR management systems and in other IT systems (including Crestbridge's email system).

Who has access to data?

Your information may be shared internally within the Crestbridge group of companies for staff administration purposes, including with members of the Crestbridge Group Services Limited (Jersey) HR and recruitment team (including your payroll information), your line manager, managers in the business area in which you work and IT staff if access to the data is strictly necessary for performance of their roles.

The Crestbridge group of companies presently comprises companies located in the European Economic Area (in Luxembourg and Ireland), in countries deemed to have an adequate level of personal data protection by the EU (in Jersey and the United Kingdom), and in third countries (Bahrain, Cayman and the United States).

Crestbridge also shares your data with third parties outside of the Crestbridge group of companies in order to:

- obtain pre-employment references from other employers;
- obtain employment background checks from third-party providers;
- obtain necessary criminal records checks;
- arrange training courses with professional education providers;
- liaise with professional bodies on your behalf;

- meet legal requirements in respect to your working at Crestbridge, pay tax (where relevant) and meet social security requirements (where relevant);
- facilitate payroll provision;
- provide you with any benefits to which you are entitled while you work at Crestbridge;
- provide occupational health services;
- meet other applicable legal requirements, including, where appropriate, the maintenance of statutory books and records and making statutory returns and filings;
- promote Crestbridge's business;
- enable you to provide the services you have contracted to provide for the benefit of Crestbridge;
- help us support our IT infrastructure and monitor our IT platform, systems and network to help prevent and detect unlawful acts;
- facilitate our Speak-Up process; and
- defend, exercise or bring legal proceedings.

Crestbridge may also share your data with third parties in the context of a sale of some or all of its business. In those circumstances the data will be subject to strict confidentiality arrangements.

Third parties will typically be based within the same jurisdictions as Crestbridge operate in (UK and Luxembourg, Ireland, Jersey, Bahrain, Cayman and the United States), but may, as an exception, be outside of those jurisdictions.

Where personal data about you is shared with other members of the Crestbridge group or third parties that are situated outside of the European Economic Area and those countries with an adequate level of personal data protection, then we endeavour to protect such sharing by using EU standard model clauses contracts in order to ensure an adequate level of protection is afforded to the information shared.

How does Crestbridge protect data?

Crestbridge takes the security of your data seriously. Crestbridge has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.

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

Further information on Crestbridge's technical and organisational security measures are available from DPO@crestbridge.com .

For how long does Crestbridge keep data?

Crestbridge's record retention periods in respect to specific staff records is set out below:

6. Human Resources

			Retention Trigger	Retain For	Action	Retention Source	IAO
6.1	Recruitment	6.1.1 Job applications and interview records for unsuccessful candidates (including CV's, correspondence and interview notes)	Last Action	12 months	Destroy	Business Need	Group Head of HR
		6.1.2 Job applications and interview records for successful candidates (including CV's, correspondence and interview notes)	End of Employment				
6.2	Onboarding	6.2.1 Pre-screening reports, right to work documentation, references, DBS checks	End of Employment	10 years	Destroy	Regulatory Requirement	
		6.2.2 Personal details form	Start of Employment	3 months		Business Need	
6.3	Employment Information	6.3.1 Terms of Employment and contractual amendment documentation	End of employment	10 years	Destroy	Business Need	
		6.3.2 Records documenting disciplinary and grievance proceedings, and performance management processes	Last action (outcome decision date)	12 months			
		6.3.4 Pathway documents, training records and CPD logs	End of employment	10 years			
		6.3.5 Secondary employment and outside interests (including investments) declarations	End of employment	10 years			
		6.3.6 First aid, mental health first aid and fire warden training details	End of employment	10 years			
6.4	Staff Personal Information	6.4.1 Third party emergency contact details provided by the staff	End of employment	Immediate	Destroy	Business Need	
		6.4.2 Staff photographs displayed on the Hub	End of employment	Immediate		Business Need	
		6.4.3 Staff bank account details	End of employment	3 months		Contractual Need	
		6.4.4 Health and Safety desk assessments	Last action	40 years		Health and Safety at Work Legislation.	

		6.4.5 Survey data (onboarding, cultural survey, exit surveys)	Last action	12 months	Anonymise	Business Need	
		6.4.6 Records documenting out of date personal details	As superseded	Immediate	Destroy	Data Protection Legislation	
		6.4.7 Employment confirmations from Crestbridge	End of employment	10 Years	Destroy	Business Need	
6.5	Absence	6.5.1 Records documenting absence information (inc. annual leave employment records, medical certificates and return to work interviews)	Earliest of last action (end of absence period) or end of employment	3 years from last action or 12 months from end of employment.	Destroy	Business Needs	
		6.5.2 Maternity, Parental Leave and Adoption pay records, calculations, certificates, state benefit calculations, details and supporting documents or other medical evidence	Last Action (end of absence period)	4 Years			
6.6	Rewards and Benefits	6.6.1 Individual compensation and award statements / reviews	As superseded or end of employment	10 years	Destroy		
		6.6.2 Monthly HR Payroll Input Sheets (including associated instruction evidence)	End of Financial Year	10 years			

		6.6.3 Death in Service Benefit Nomination Forms	End of employment	Immediate				
		6.6.4 Staff Pension Details (including contributions of employee and employer, pension scheme deeds, automatic enrolments, policies and rules and investment policies)	From date of birth	100 years				
		6.6.5 Benefit information (medical and dental insurances)	End of employment	Immediate				
6.7	Performance Reviews	Data relating to annual performance reviews	End of employment	12 months	Destroy			
6.8	Termination of Employment	6.8.1 Records documenting employee's redundancy or contract termination	End of employment	10 years	Destroy			
		6.8.2 Industrial Relations / Employment Tribunal	Last action	10 years				
		6.8.3 Compromise Agreements	Date of agreement	10 years				
		6.8.4 Exit interview and termination reason	End of employment	12 months				

Your rights

As a data subject, you have a number of rights in respect to the personal data we collect and use.

These rights may vary according to the jurisdictional law applicable to our relationship with you and are usually also subject to various conditions being met for their use and exemptions that may be applied depending on the circumstances of a particular case.

Where applicable, you have the following rights:

- Right to Information
- Right of Access
- Right to Object to Processing
- Right to Rectification
- Right to Erasure
- Right to Restriction of Processing
- Right not to be subject to decisions based on Automated Processing
- Right to Data Portability
- Right to Withdraw Consent
- Right to a Judicial Remedy
- Right to Compensation

You also have the right to lodge a complaint about our handling of your personal information with a relevant data protection supervisory authority either in the country/territory in which you are located and/or in the jurisdiction in which we are located and process your personal information. For a list and contact details of the data protection regulatory authorities in our different jurisdictions please see Crestipedia - Data Protection Regulatory Authorities.pdf - All Documents (sharepoint.com) . Whenever you are considering lodging a complaint however we should please be grateful if you would first allow us the opportunity to resolve your complaint by addressing it in writing, and providing as much detail as possible, to dpo@crestbridge.com or hrgroup@crestbridge.com .

If you would like further information on these rights or to exercise any of them, please contact the Data Protection Officer. You can make a subject access request by completing Crestbridge's form for making a subject access request.

What if you do not provide personal data?

You have some obligations under your employment contract to provide Crestbridge with data. In particular, you are required to report absences from work and may be required to provide information about disciplinary or other matters under the implied duty of good faith. You may also have to provide Crestbridge with data in order to exercise your statutory rights, such as in relation to statutory leave entitlements. Failing to provide the data may mean that you are unable to exercise your statutory rights.

Certain information, such as contact details, your right to work in the location of which you are employed and payment details, have to be provided to enable Crestbridge to enter a contract of employment with you. If you do not provide other information, this will hinder Crestbridge's ability to administer the rights and obligations arising as a result of the employment relationship efficiently.

Questions

If you have any questions about this Privacy Notice or how we handle your personal information (e.g. our retention procedures or the security measures we have in place), or if you would like to make a complaint, please contact dpo@crestridge.com or hrgroup@crestbridge.com .