

Privacy Notice

As a member of VineHR Limited we are committed to protecting and respecting your privacy. This privacy statement explains how we use information about you and the ways in which we protect your privacy.

For the purposes of data protection, VineHR Limited is the Data Controller for the personal information you provide.

What is Personal Data?

Personal data is any information relating to a living person who can be identified from that data directly or indirectly such as name, photograph, identification number, location data or online identifier. There are also special categories of personal data referred to as 'sensitive personal data' which include genetic data, biometric data, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation.

Categories of Personal Data we may collect

VineHR will obtain and process some or all of the following personal data to perform its tasks:

- Names, titles, aliases, photographs
- Contact details such as telephone numbers, business addresses and email addresses.
- Financial identifiers such as bank account numbers and details
- Other relevant information required such as qualifications, education and experience

The personal data we process may also include sensitive or other special categories of personal data such as dietary requirements, medication/treatment received

The General Data Protection Regulations 2018 state that the personal data we hold about you must be:

- Used lawfully, fairly and in a transparent way
- Collected only for the purpose of carrying out your enquiry or processing your application
- Relevant to the purposes we have told you about and limited only to those purposes
- Accurate and kept up to date
- Kept only as long as necessary and for the purpose we have advised you of
- Kept securely ensuring appropriate security measures are in place to protect your personal data from loss, misuse, unauthorised access and disclosure
- Destroyed securely when no longer required

How will my information be used?

Personal information you supply to us may be used in a number of ways. We collect information about you to:

- Consider your suitability when applying for a training event including workshops, masterclasses and qualifications with VineHR Limited
- Processing of Payments
- Raising and processing Invoices, VAT returns
- Where you have consented to the use of photos in promotional material
- To help investigate complaints or concerns you have raised
- Requesting payment from your employer, or you for training attended

Lawful basis for processing personal data

The lawful bases for processing your personal data are as follows:

- Contractual Obligations – Consent has been provided - where you have provided your explicit consent to allow us to process your personal data.

Who will the data be shared with?

In most cases we will not disclose personal data without consent. However, there are situations where consent would not be required such as when we feel there is a good reason that is more important than protecting your confidentiality. This does not happen often, but we may share your information:

- For the detection and prevention of crime/fraudulent activity; or
- If there are serious risks to the public, other members of staff or to other professionals;
- To protect a child; or
- To protect adults who are thought to be at risk, for example if they are frail, confused or cannot understand what is happening to them.
- Where there is a risk to you and the risk is sufficiently serious that the need to disclose your information is more important than protecting your confidentiality.

We do not sell personal information to any other organisation for the purposes of direct marketing.

How do we keep information secure?

We take appropriate steps to make sure that the information we hold about you either electronically or on paper is held in a secure way. Your personal information will only be made available to those who have a right to see them. Our security measures include:

- Encryption
- Access controls on databases/systems

How long do we keep your personal information?

Retention periods will differ depending on the reason you are providing information to us and whether we are legally required to keep personal data indefinitely. In general, we will endeavour to keep data only for as long as we need it. This means we will delete your personal data when it is no longer needed.

Your rights and your personal data

You have the following rights in relation to your personal data:

- **The right to access personal data we hold on you.** You can request this at any time including details as to why we have that personal data, who has access to the personal data and where we obtained the personal data from. Please email us at vine.hr@essex.gov.uk or write to us at VineHR Limited, Causeway House, Bocking End, Braintree, CM7 9HB.
- **The right to correct and update the personal data we hold on you.** If any of the personal data we hold on you is out of date, incomplete or incorrect, you can inform us and we will update your personal data
- **The right to have your personal data erased.** If you feel that we should no longer be using your personal data or that we are unlawfully using your personal data, you can request that we erase the personal data we hold. We may not be able to delete your personal data if it is required to comply with a legal obligation
- **The right to object to processing of your personal data or to restrict it to certain purposes only.** You have the right to request that we stop processing your personal data or to ask us to restrict the processing. We will contact you to let you

know if we are able to comply or if we have a legal obligation to continue to process your personal data

- **The right to withdraw consent.** You have the right to withdraw your consent to the processing of personal data to which consent was obtained by contacting us either by email or post. We may not be able to stop processing of your personal data if however it is required to comply with a legal obligation, however we will explain this

When exercising any of the rights listed above, we may need you to verify your identity for your security to process your request.

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law you can complain to the Information Commissioner's Office at <https://ico.org.uk/> or by calling them on 0303 123 1113.

Links to other websites

Our internet and intranet contains links to external websites. However, this privacy notice does not cover these links and we would encourage you to read the privacy statement on the external websites you may visit.

Using our Intranet and Internet

If you are a user with general public access, our website does not store or capture personal information, but merely logs a number called your IP address which is automatically recognised by the system.

Changes to our privacy policy

We will keep our privacy policy under regular review and we will place any updates on this page. This privacy policy was last updated on 17th May 2018.