

Privacy Notice for Colleagues, Bank Workers, Directors and Consultants

This statement should be read by all colleagues including bank workers



1 Introduction

Voyage Care and its subsidiaries are committed to respecting the privacy and security of your personal information. This notice explains how we collect and use the personal information we collect about you before, during and after your working relationship with us. This notice explains how we comply with the law on data protection and what your rights are in relation to your personal information.

Voyage Care is the data controller and references to 'we', 'our', or 'us' in this privacy notice are referring to the relevant company in group responsible for processing your data. As the data controller, we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to prospective, current and former colleagues, bank workers, directors and consultants. This notice does not form part of any contract of employment or other contract to provide services.

2 Data Protection Principles

The Company will comply with data protection law. This means that the personal information we hold about you must be:

- used lawfully, fairly and in a transparent way;
- collected only for valid purposes that we have explained to you clearly and not used in any way that is incompatible with these purposes;
- relevant to the purposes we have told you about and limited to those purposes only;
- accurate and kept up to date;
- kept only for such time as is necessary for the purposes we have told you about; and • kept securely.

3 Personal Information

Voyage Care collects and processes a range of personal information (personal data) about you. Personal data means any information about an individual from which the person can be identified. This includes:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses and emergency contact details;
- Date of birth;
- Gender;
- Information about your marital status, next of kin, dependants, family members and emergency contacts;
- Information about your nationality and entitlement to work in the UK;
- National insurance number and other tax or governmental identifiers;
- Details of your bank account, payroll and tax status;



- Information about your salary, insurance, annual leave, pension, benefit entitlement and expenses;
- The terms and conditions of your employment or engagement;
- Details of your education, qualifications, skills, experience and career history;
- Attendance history, including annual leave, sickness leave, maternity, paternity, parental and compassionate leave;
- Details of your schedule (working days, working hours and details of when you are not available for work);
- Copy of your driving licence(s) and vehicle details;
- Copies of identification documents and information such as passport, utility bills, identity cards, signature etc;
- Information about medical or health conditions, including whether or not you have a disability for which Voyage Care needs to make reasonable adjustments;
- Information from recruitment processes and checks (including copies of right to work documentation, DBS referrals and checks, past employment history, references and other information included in a CV or cover letter or as part of the application process);
- Employment records and notes (including job titles, work history, working hours, training records, professional memberships, and details of any home-working assessment for health and safety purposes);
- Information about your performance including that generated through our appraisal systems;
- Disciplinary and grievance information;
- Details of your movements through CCTV footage and other information obtained through electronic means such as swipe card and key fob records;
- Geolocational data and behavioural data obtained through telematics tracking devices fitted to vehicles owned or leased by the Company;
- Images in video and/or photographic form and voice recordings; • Shareholdings and company share scheme participation;; and • Records of enquiries and other correspondence with you.

4 Where we collect your information

Voyage Care collects personal information about colleagues, bank workers, directors and consultants in a variety of ways. For example, data is collected through the application and recruitment process and during work-related activities throughout the period working for us.

We may sometimes collect additional information from third parties including former employers and information from background check agencies (such as the Disclosure Barring Service) as permitted by the law.



5 How we use your personal information

Voyage Care needs to process your personal information in order to enter into an employment or worker contract with you and meet our obligations under that contract.

Voyage Care will also process data to ensure that we are complying with our legal obligations, for example, we are required to check a colleague's entitlement to work in the UK and for certain positions, it is necessary to carry out criminal records checks to ensure that colleagues are permitted to undertake a particular role.

We may process your personal data where it is necessary for the purposes of our legitimate interests (or those of a third party), provided that these interests are not overridden by your own interests, rights, or freedoms as the data subject.

In some circumstances, more than one lawful basis may be relevant to a particular processing activity, meaning there may be several reasons for which we are permitted to process your personal data.

Situations in which we will process your personal information are listed below:

- When offering work;
- To maintain accurate and up-to-date HR records and contact details (including details of whom to contact in the event of an emergency), and records of your contractual and statutory rights;
- To check you are legally entitled to work in the UK;
- To pay you;
- To provide benefits of employment, including flexible benefits and liaising with benefit providers;
- To keep a record of working hours and holiday to allow effective workforce management;
- To keep a record of absence to allow effective workforce management and ensure that you are receiving the pay you are entitled to;
- To ensure effective general HR and business administration;
- When conducting performance reviews, grievance or disciplinary hearings, managing performance and determining performance requirements and making decisions about compensation and benefits;
- For business management and planning, including accounting and auditing, conducting our normal business operations and managing our relationship with you;
- When assessing qualifications for a particular job or task, including decisions about promotions and ascertaining your fitness to work, education, training and development requirements;
- To comply with health and safety regulations and law;
- When dealing with legal disputes involving you, or other colleagues, bank workers, directors and consultants, including accidents at work;
- For the purposes of ensuring the security of our systems and our information, to ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution;

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- To facilitate the use of our IT systems and monitor your use of our information and communication systems to ensure compliance with our IT policies;
- To comply with our legal obligations, for example in relation to PAYE, National Insurance, Companies House filings;
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution;
- To conduct data analytics studies to review and better understand colleague retention and attrition rates;
- For the purposes of equal opportunities monitoring;
- For the purposes of managing your shareholding in us, your rights to shares and dividend details;
- For the purpose of complying with any regulatory requirements;
- We will use and retain information about criminal convictions to comply with law and in order to determine your eligibility to undertake particular types of work; and
- To monitor and analyse geolocation and behavioural data through telematics tracking systems fitted to vehicles owned or leased by Voyage Care for the purposes of insurance and health and safety compliance.

For some of your personal information you will have a legal, contractual or other requirement or obligation to provide us with your personal information. If you do not provide us with certain personal information when requested, Voyage Care may not be able to allow you to be employed or offer your services to us.

Voyage Care will only use your personal information for the purpose for which it was collected unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use personal information for an unrelated purpose, we will advise you of this and explain the legal basis which allows us to do so.

You should be aware that we may process your personal information without your knowledge or consent, in compliance with this privacy notice, where this is required or permitted by law.

6 How we use special category data

Sensitive personal information about you, such as information about your health, racial or ethnic origin, sexual orientation, or trade union membership, require higher levels of protection. Voyage Care is required to have additional grounds to justify processing this type of personal information.

We may process special categories of personal information in the following circumstances:



- With your explicit written consent;
- Where we need to carry out our legal obligations or exercise rights in connection with employment or social security;
- Where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme; and
- Where it is necessary to protect you or another person from harm.

7 Who we share your personal information with

Your personal information will be shared within the group companies as appropriate and necessary.

Voyage Care shares your personal information with third parties where required by law, where it is necessary in order to administer the working relationship with you or where we have another legitimate reason for doing so.

Voyage Care may also share your personal information with other third parties, for example in the context of a sale of some of or all of its business. In those circumstances, the data will be subject to confidentiality arrangements.

Voyage Care takes the security of your personal information seriously. Voyage Care has internal policies and procedures, and controls in place to prevent your information being lost, accidentally destroyed, misused or disclosed, and is not accessed except by authorised colleagues in the performance of their duties.

When Voyage Care engages third parties to process your personal information 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 your information.

The personal information we collect is not transferred to and stored in countries outside of the UK and the European Economic Area.

8 How long we keep your personal information for

Voyage Care will only hold your personal information for as long as is necessary to fulfil the purposes we collected it for, including any legal, accounting or reporting requirements.

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. In some cases, personal information may be retained on a long-term basis in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal or insurance requirement, we retain all physical and electronic records for a period of 6 years after your employment ends.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you move home or change



your phone number or email address. Please complete a change or circumstances form or contact your manager or the HR department if you need to change your personal information.

9 Your rights in relation to your personal information

As a data subject you have a number of rights as set out below:

Right of access	You have the right to obtain confirmation from Voyage Care as to whether or not personal data concerning you is being processed, and, where that is the case, you can request access to that personal data.
Right to rectification	You have the right to ask Voyage Care to correct any inaccurate personal information about you.
Right to erasure (right to be forgotten)	You have the right to ask Voyage Care to delete or stop processing some of your personal information, for example where the data is no longer necessary for the purposes of processing.
Right to object to processing	You have the right to object to Voyage Care processing your personal information for legitimate reasons where you have specific reasons to object to the processing
Right to restriction of processing	You have the right (under certain circumstances) to ask Voyage Care to restrict processing of your personal information . For example, you may request this if you are contesting the accuracy of personal data held about you.
Right to data portability	You have the right (under certain circumstances) to ask Voyage Care to provide you with your personal information in a structured, commonly used and machine-readable format. You also have the right to request that we transmit this data directly to another data controller.
Right to withdraw consent	If the lawful basis for processing is consent, you have the right to withdraw that consent.
Rights in relation to automated decision making and profiling	Voyage Care does not perform any automated decision-making based on personal information that produces legal effects or similarly significantly affects you.

Please note, some of these rights, for example the right to require us to transfer your data to a third party or the right to be forgotten, may only apply in specific circumstances.

10 Contacting us and Complaints

Voyage Care's Data Protection Officer oversees compliance with this privacy notice. If you wish to exercise any of your rights concerning your personal data, or if you have any questions relating to your rights, please contact the Data Protection Officer via informationsecurity@voyagecare.com

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If you are not satisfied with the response you receive or if you believe that Voyage Care has not complied with your data protection rights, you have the right to make a complaint with the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. We do however, encourage you to contact us in the first instance, to resolve your concerns.

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
(t) 0303 123 1113
(e) casework@ico.org.uk

While this privacy notice sets out a general summary of your legal rights in respect of personal information, more information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

11 Changes to this Privacy Notice

We reserve the right to update this Privacy Notice at any time. If we make substantial updates, we will provide you with a new Privacy Notice.