

Personal Data Processing Activities and Time Limits of Data Storage

Data Protection Officer: Chloe Leyland

Category of personal data (1)	Purposes of processing (2)	Category of data subject (3)	Category of recipients to whom the data has been or will be disclosed) (4) ¹	Information about transfers to non-EEA countries or to international organisations (5) ²	Envisaged time limits for erasure of the data (6)	Where possible, a general description of the technical and organisational security measures adopted (7)	Legal basis for processing (8)	Legal basis for processing special categories of personal data or data on criminal convictions and offences (9)
1. Personal information and contact details, including name, address, telephone numbers, personal e-mail address, date of birth, gender and emergency contact details	<p>For HR, personnel management and business administration purposes</p> <p>To enable the business to maintain accurate employee records and contact details</p>	<p>Job applicants</p> <p>Current employees</p> <p>Former employees</p>	<p>Professional advisors, e.g. accountants and auditors</p> <p>The client to whom the job applicant or current employee is assigned to work.</p> <p>3rd party processing HR Support team based in Mauritius for the purpose of conducting reference and background checks and general HR Support.</p>	<p>A limited number of queries go to a ticketing system based in the USA. The data they have includes full name and email address. The personal data is deleted once the query is resolved. The company also adheres to American legislation equivalent to GDPR.</p> <p>3rd party processing HR Support team based in Mauritius. Specific contracts are in place with each processor, full training has been provided, all personal data information accessed is password protected and housed on a UK cloud system. No hard copies of information are created or housed outside the UK Head Office. No details saved on personal computers housed outside the UK.</p>	<p>Unsuccessful job applicants: one year after the end of the recruitment exercise</p> <p>Current employees: not erased.</p> <p>Former employees: one year after the end of their employment, subject to any minimum statutory requirements for particular records</p>	<p>Manual data held in locked office. Only Head Office Management Team has access to this.</p> <p>Electronic data held on local network. No other access can be gained externally. UK Server held in a secure locked cupboard within Head Office. Only the management team has access to this.</p> <p>Personal data sent to clients is password protected to specific Client Managers. Deletion of information agreements in place. Other information required by the client is attached to a Share Point which is strongly password protected.</p> <p>There is a Specific Data Breach Policy & Response Plan.</p>	<p>Necessary for the performance of the employment contract (or to take steps to enter into an employment contract)</p> <p>Necessary for compliance with a legal obligation</p> <p>Necessary for the legitimate interests of the business</p>	

¹ including recipients in non-EEA countries or international organisations

² including details of appropriate safeguards in place

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						<p>All computers which have access to information are password protected.</p> <p>Specific controller to processor agreements in place to ensure security of personal data.</p> <p>GDPR training is part of all Monarch Personnel's management teams development and induction. 3rd party HR Support processors will receive training as well.</p>		
2.	<p>Recruitment records, including CVs, application forms, interview notes, references, proof of right to work in the UK, qualification certificates, other background checks, psychometric profiles, specific completed tests.</p>	<p>For HR, personnel management and business administration purposes</p> <p>To assess the suitability of job applicants for employment</p> <p>To comply with legislative and/or regulatory requirements</p> <p>For defence against possible legal claims</p>	<p>Job applicants</p> <p>Current employees</p> <p>Former employees</p>	<p>3rd party processors HR Support team based in Mauritius for the purpose of conducting reference and background checks and general HR Support.</p> <p>Professional advisors, e.g. accountants and auditors</p> <p>The client to whom the job applicant or current employee is assigned to work.</p>	<p>3rd party processing HR Support team based in Mauritius. Specific contracts are in place with each processor, full training has been provided, all personal data information accessed is password protected and housed on a UK cloud system. No hard copies of information are created or housed outside the UK Head Office. No details saved on personal computers housed outside the UK.</p>	<p>Unsuccessful job applicants: one year after the end of the recruitment exercise</p> <p>Current employees: not erased</p> <p>Former employees: one year after the end of their employment, subject to any minimum statutory requirements for particular records</p>	<p>Manual data held in locked office. Only Head Office Management Team has access to this.</p> <p>Electronic data held on local network. No other access can be gained externally. UK Server held in a secure locked cupboard within Head Office. Only the management team has access to this.</p> <p>Personal data sent to clients is password protected to specific Client Managers. Deletion of information agreements in place. Other infor-</p>	<p>Necessary for the performance of the employment contract (or to take steps to enter into an employment contract)</p> <p>Necessary for compliance with a legal obligation</p> <p>Necessary for the legitimate interests of the business</p>

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						<p>mation required by the client is attached to a Share Point which is strongly password protected.</p> <p>There is a Specific Data Breach Policy & Response Plan.</p> <p>All computers which have access to information are password protected.</p> <p>Specific controller to processor agreements in place to ensure security of personal data.</p> <p>GDPR training is part of all Monarch Personnel's management teams development and induction. 3rd party HR Support processors will receive training as well.</p>		
3.	<p>Recruitment records containing special categories of personal data and/or data on criminal convictions and offences, including criminal record checks and health information</p> <p>For HR, personnel management and business administration purposes</p> <p>To assess the suitability of job applicants for employment</p> <p>To comply with legislative and/or regulatory requirements</p> <p>To comply with the duty to make reason-</p>	<p>Job applicants</p> <p>Current employees</p> <p>Former employees</p>	<p>3rd party processing HR Support team based in Mauritius for the purpose of conducting reference and background checks and general HR Support.</p> <p>Professional advisors, e.g. accountants and auditors</p> <p>The client to whom</p>	<p>3rd party processing HR Support team based in Mauritius. Specific contracts are in place with each processor, full training has been provided, all personal data information accessed is password protected and housed on a UK cloud system. No hard copies of information are created or housed outside the UK Head</p>	<p>Unsuccessful job applicants: one year after the end of the recruitment exercise</p> <p>Current employees: not erased.</p> <p>Former employees: one year after the end of their employment, subject to any minimum statutory requirements for particular records</p>	<p>Manual data held in locked office. Only Head Office Management Team has access to this.</p> <p>Electronic data held on local network. No other access can be gained externally. UK Server held in a secure locked cupboard within Head Office. Only the management team has access to</p>		<p>Necessary to perform or exercise obligations or rights under employment law</p> <p>Special categories of personal data and data on criminal convictions and offences are retained and erased in accordance with our policy document covering this</p>

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	<p>able adjustments for disabled applicants and employees</p> <p>For defence against possible legal claims</p>		the job applicant or current employee is assigned to work.	Office. No details saved on personal computers housed outside the UK.		<p>this.</p> <p>Personal data sent to clients is password protected to specific Client Managers. Deletion of information agreements in place. Other information required by the client is attached to a Share Point which is strongly password protected.</p> <p>There is a Specific Data Breach Policy & Response Plan.</p> <p>All computers which have access to information are password protected.</p> <p>Specific controller to processor agreements in place to ensure security of personal data.</p> <p>GDPR training is part of all Monarch Personnel's management teams development and induction. 3rd party HR Support processors will receive training as well.</p>		
4.	Job offer letters, employment contracts, written statements of employment	For HR, personnel management and business administration purposes	Current employees Former employees	3 rd party processing HR Support team based in Mauritius for the purpose of con-	3 rd party processing HR Support team based in Mauritius. Specific contracts are	Current employees: not erased Former employees:	Manual data held in locked office. Only Head Office Management Team has access	Necessary for the performance of the employment contract (or to take steps to

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<p>terms, pay review and bonus letters, statements of changes to employment terms and related correspondence</p>	<p>To maintain an accurate record of employment terms and to ensure compliance with employees' statutory and contractual rights</p> <p>For defence against possible legal claims</p>		<p>ducting reference and background checks and general HR Support.</p> <p>Professional advisors, e.g. accountants and auditors</p> <p>The client to whom the job applicant or current employee is assigned to work.</p>	<p>in place with each processor, full training has been provided, all personal data information accessed is password protected and housed on a UK cloud system. No hard copies of information are created or housed outside the UK Head Office. No details saved on personal computers housed outside the UK.</p>	<p>one year after the end of their employment, subject to any minimum statutory requirements for particular records</p>	<p>to this.</p> <p>Electronic data held on local network. No other access can be gained externally. UK Server held in a secure locked cupboard within Head Office. Only the management team has access to this.</p> <p>Personal data sent to clients is password protected to specific Client Managers. Deletion of information agreements in place. Other information required by the client is attached to a Share Point which is strongly password protected.</p> <p>There is a Specific Data Breach Policy & Response Plan.</p> <p>All computers which have access to information are password protected.</p> <p>Specific controller to processor agreements in place to ensure security of personal data.</p> <p>GDPR training is part of all Monarch Personnel's management</p>	<p>enter into an employment contract)</p> <p>Necessary for compliance with a legal obligation</p> <p>Necessary for the legitimate interests of the business</p>	

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						teams development and induction. 3 rd party HR Support processors will receive training as well.		
5.	<p>Financial, payroll and tax information, including salary, benefits, pension, bank account details, tax codes and NI numbers</p> <p>To ensure employees are paid correctly and receive the correct benefits</p> <p>To ensure compliance with income tax requirements</p> <p>For defence against possible legal claims</p>	<p>Current employees</p> <p>Former employees</p>	<p>External pension scheme provider</p> <p>3rd party processing HR Support team based in Mauritius for the purpose of general HR support administration.</p> <p>Professional advisors, e.g. accountants and auditors</p>	<p>3rd party processing HR Support team based in Mauritius. Specific contracts are in place with each processor, full training has been provided, all personal data information accessed is password protected and housed on a UK cloud system. No hard copies of information are created or housed outside the UK Head Office. No details saved on personal computers housed outside the UK.</p>	<p>Current employees: not erased</p> <p>Former employees: up to seven year after the end of their employment, subject to any minimum statutory requirements for particular records</p>	<p>Manual data held in locked office. Only Head Office Management Team has access to this.</p> <p>Electronic data held on local network. No other access can be gained externally. UK Server held in a secure locked cupboard within Head Office. Only the management team has access to this.</p> <p>Personal data sent to clients is password protected to specific Client Managers. Deletion of information agreements in place. Other information required by the client is attached to a Share Point which is strongly password protected.</p> <p>There is a Specific Data Breach Policy & Response Plan.</p> <p>All computers which have access to information are password protected.</p>	<p>Necessary for the performance of the employment contract (or to take steps to enter into an employment contract)</p> <p>Necessary for compliance with a legal obligation</p>	

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6.	<p>Disciplinary, grievance and capability records, including investigation reports, collated evidence, minutes of hearings and appeal hearings, warnings, performance improvement plans and related correspondence</p>	<p>For HR, personnel management and business administration purposes</p> <p>To maintain a record of disciplinary, grievance and capability procedures and action taken</p> <p>For defence against possible legal claims</p>	<p>Current employees</p> <p>Former employees</p>	<p>3rd party processing HR Support team based in Mauritius for the purpose general HR support administration.</p> <p>Professional advisors, e.g. accountants and auditors</p> <p>The client to whom the job applicant or current employee is assigned to work.</p>	<p>3rd party processing HR Support team based in Mauritius. Specific contracts are in place with each processor, full training has been provided, all personal data information accessed is password protected and housed on a UK cloud system. No hard copies of information are created or housed outside the UK Head Office. No details saved on personal computers housed outside the UK.</p>	<p>Until the expiry of any warning given, but a summary disciplinary, grievance or performance management record will still be maintained as follows:</p> <p>Current employees: not erased.</p> <p>Former employees: one year after the end of their employment</p>	<p>Manual data held in locked office. Only Head Office Management Team has access to this.</p> <p>Electronic data held on local network. No other access can be gained externally. UK Server held in a secure locked cupboard within Head Office. Only the management team has access to this.</p> <p>Personal data sent to clients is password protected to specific Client Managers. Deletion of information agreements in place. Other information required by the client is attached to a Share Point which is strongly password</p>	<p>Necessary for compliance with a legal obligation</p> <p>Necessary for the legitimate interests of the business</p>	

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						<p>protected.</p> <p>There is a Specific Data Breach Policy & Response Plan.</p> <p>All computers which have access to information are password protected.</p> <p>Specific controller to processor agreements in place to ensure security of personal data.</p> <p>GDPR training is part of all Monarch Personnel's management teams development and induction. 3rd party HR Support processors will receive training as well.</p>		
7.	<p>Appraisals, including appraisal forms, performance reviews and ratings, targets and objectives set</p> <p>For HR, personnel management and business administration purposes</p> <p>To maintain a record of performance management systems</p> <p>To record and assess education, training and development activities and needs</p> <p>For the management, planning and organisation of work</p>	<p>Current employees</p> <p>Former employees</p>	<p>3rd party processing HR Support team based in Mauritius for the purpose general HR support administration.</p> <p>Professional advisors, e.g. accountants and auditors</p> <p>The client to whom the job applicant or current employee is assigned to work.</p>	<p>3rd party processing HR Support team based in Mauritius. Specific contracts are in place with each processor, full training has been provided, all personal data information accessed is password protected and housed on a UK cloud system. No hard copies of information are created or housed outside the UK Head Office. No details saved on personal computers housed</p>	<p>Current employees: not erased.</p> <p>Former employees: one year after the end of their employment</p>	<p>Manual data held in locked office. Only Head Office Management Team has access to this.</p> <p>Electronic data held on local network. No other access can be gained externally. UK Server held in a secure locked cupboard within Head Office. Only the management team has access to this.</p> <p>Personal data sent to</p>	<p>Necessary for the performance of the employment contract (or to take steps to enter into an employment contract)</p> <p>Necessary for compliance with a legal obligation</p> <p>Necessary for the legitimate interests of the business</p>	

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	For defence against possible legal claims			outside the UK.		<p>clients is password protected to specific Client Managers. Deletion of information agreements in place. Other information required by the client is attached to a Share Point which is strongly password protected.</p> <p>There is a Specific Data Breach Policy & Response Plan.</p> <p>All computers which have access to information are password protected.</p> <p>Specific controller to processor agreements in place to ensure security of personal data.</p> <p>GDPR training is part of all Monarch Personnel's management teams development and induction. 3rd party HR Support processors will receive training as well.</p>		
8.	Annual leave, other leave and sickness absence records, including details of the types of and reasons for leave or absence being taken and related corre-	For HR, personnel management and business administration purposes To maintain a record of the operation of annual leave proce-	Current employees Former employees	3 rd party processing HR Support team based in Mauritius for the purpose general HR support administration. Professional advisors,	3 rd party processing HR Support team based in Mauritius. Specific contracts are in place with each processor, full training has been provided, all personal data infor-	Current employees: not erased. Former employees: one year after the end of their employment, subject to any minimum statutory re-	Manual data held in locked office. Only Head Office Management Team has access to this. Electronic data held on local network. No	Necessary for the performance of the employment contract (or to take steps to enter into an employment contract) Necessary for compli-

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<p>spondence</p>	<p>dures</p> <p>To maintain a record of the operation of sickness absence procedures</p> <p>To maintain a record of maternity leave, paternity leave, adoption leave, shared parental leave, parental leave and any other type of paid or unpaid leave or time off work</p> <p>To ensure payment of SSP or contractual sick pay</p> <p>To ensure payments of other statutory or contractual pay entitlements, e.g. SMP, SPP, SAP and ShPP</p> <p>To comply with the duty to make reasonable adjustments for disabled employees</p> <p>To meet health and safety obligations.</p> <p>For defence against possible legal claims</p>		<p>e.g. accountants and auditors</p> <p>The client to whom the job applicant or current employee is assigned to work.</p>	<p>mation accessed is password protected and housed on a UK cloud system. No hard copies of information are created or housed outside the UK Head Office. No details saved on personal computers housed outside the UK.</p>	<p>quirements for particular records which would be up to a maximum for 7 years.</p>	<p>other access can be gained externally. UK Server held in a secure locked cupboard within Head Office. Only the management team has access to this.</p> <p>Personal data sent to clients is password protected to specific Client Managers. Deletion of information agreements in place. Other information required by the client is attached to a Share Point which is strongly password protected.</p> <p>There is a Specific Data Breach Policy & Response Plan.</p> <p>All computers which have access to information are password protected.</p> <p>Specific controller to processor agreements in place to ensure security of personal data.</p> <p>GDPR training is part of all Monarch Personnel's management teams development and induction. 3rd party HR Support processors will re-</p>	<p>ance with a legal obligation</p> <p>Necessary for the legitimate interests of the business</p>	

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						ceive training as well.		
9.	<p>Annual leave, other leave and sickness absence records containing special categories of personal data, including information about medical conditions, medical reports, reasons for sickness absence, reasonable adjustments and related correspondence</p> <p>For HR, personnel management and business administration purposes</p> <p>To maintain a record of the operation of annual leave procedures</p> <p>To maintain a record of the operation of sickness absence procedures</p> <p>To maintain a record of maternity leave, paternity leave, adoption leave, shared parental leave, parental leave and any other type of paid or unpaid leave or time off work</p> <p>To ensure payment of SSP or contractual sick pay</p> <p>To ensure payments of other statutory or contractual pay entitlements, e.g. SMP, SPP, SAP and ShPP</p> <p>To comply with the duty to make reasonable adjustments for disabled employees</p> <p>To meet health and safety obligations.</p>	<p>Current employees</p> <p>Former employees</p>	<p>3rd party processing HR Support team based in Mauritius for the purpose general HR support administration.</p> <p>Professional advisors, e.g. accountants and auditors</p> <p>The client to whom the job applicant or current employee is assigned to work.</p>	<p>3rd party processing HR Support team based in Mauritius. Specific contracts are in place with each processor, full training has been provided, all personal data information accessed is password protected and housed on a UK cloud system. No hard copies of information are created or housed outside the UK Head Office. No details saved on personal computers housed outside the UK.</p>	<p>Current employees: not erased.</p> <p>Former employees: one year after the end of their employment, subject to any minimum statutory requirements for particular records which would be up to a maximum for 7 years.</p>	<p>Manual data held in locked office. Only Head Office Management Team has access to this.</p> <p>Electronic data held on local network. No other access can be gained externally. UK Server held in a secure locked cupboard within Head Office. Only the management team has access to this.</p> <p>Personal data sent to clients is password protected to specific Client Managers. Deletion of information agreements in place. Other information required by the client is attached to a Share Point which is strongly password protected.</p> <p>There is a Specific Data Breach Policy & Response Plan.</p> <p>All computers which have access to information are password protected.</p> <p>Specific controller to processor agreements in place to ensure</p>		<p>Necessary to perform or exercise obligations or rights under employment law or social security law</p> <p>Special categories of personal data are retained and erased in accordance with our policy document covering this</p>

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	For defence against possible legal claims.					<p>security of personal data.</p> <p>GDPR training is part of all Monarch Personnel's management teams development and induction. 3rd party HR Support processors will receive training as well.</p>		
10.	<p>Termination of employment documentation, including resignation letters, dismissal letters, redundancy letters, minutes of meetings, settlement agreements and other related correspondence</p> <p>For HR, personnel management and business administration purposes</p> <p>To maintain a record of the operation of dismissal/ termination procedures</p> <p>To comply with legislative requirements</p> <p>For defence against possible legal claims</p>	<p>Current employees</p> <p>Former employees</p>	<p>3rd party processing HR Support team based in Mauritius for the purpose general HR support administration.</p> <p>Professional advisors, e.g. accountants and auditors</p>	<p>3rd party processing HR Support team based in Mauritius. Specific contracts are in place with each processor, full training has been provided, all personal data information accessed is password protected and housed on a UK cloud system. No hard copies of information are created or housed outside the UK Head Office. No details saved on personal computers housed outside the UK.</p>	<p>Current employees: not erased.</p> <p>Former employees: one year after the end of their employment, subject to any minimum statutory requirements for particular records</p>	<p>Manual data held in locked office. Only Head Office Management Team has access to this.</p> <p>Electronic data held on local network. No other access can be gained externally. UK Server held in a secure locked cupboard within Head Office. Only the management team has access to this.</p> <p>Personal data sent to clients is password protected to specific Client Managers. Deletion of information agreements in place. Other information required by the client is attached to a Share Point which is strongly password protected.</p> <p>There is a Specific Data Breach Policy &</p>	<p>Necessary for the performance of the employment contract (or to take steps to enter into an employment contract)</p> <p>Necessary for compliance with a legal obligation</p> <p>Necessary for the legitimate interests of the business</p>	

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