



PRIVACY NOTICE

Global Highland Ltd (GHL) is a provider of resource management services and manpower supply to the private and public sectors across the United Kingdom. Our brand aims to be synonymous with cost-effective delivery of high quality, fully-integrated, people management solutions.

We are committed to safeguarding the privacy of all persons under the control of Global Highland Ltd, and as such, all tasks or services requiring the processing of personal data shall be completed within the bounds of the General Data Protection Regulation (GDPR). This Privacy Notice shall outline how we achieve this.

At all times, GHL shall be what is known as the 'Data Controller' of the personal data provided to us. Where another party requires GHL to share items of personal data, this shall be completed for a legitimate purpose (i.e. with a Client as part of the recruitment process) or with the consent of the Data Subject, and under the reassurance that the entity we are transferring the data to has an equivalent level of safeguarding in place.

What is Personal Data?

Personal data is information that can identify you as a living individual, and is split into two 'types' of data, each with specific controls and guidelines. General personal data includes data such as your name, address, National Insurance number, and online identifiers/location data. The second type, sensitive data, includes information on physical and mental health, sexual orientation, race or ethnic origin, religious beliefs, trade union membership and criminal records. Sensitive personal data must be protected to a higher level than general personal data.

How Does GHL get your Personal Data?

You may have made an application directly to us via email or a job advert, through social media, or by telephone. GHL can process this data if we have a legal basis for doing so. There are 6 legal bases for processing data, but GHL is most likely to rely on:

- That the processing is necessary for the performance of a contract with you (i.e. Recruitment Services)
- That GHL has a legitimate interest in processing your data
- Your consent

Different conditions apply to each of these legal bases.

What information does GHL collect about you?

GHL will always collect basic contact information from you at the start of our relationship in order to maintain contact with you and provide our services. The other information that GHL collects about you will vary, dependent on the nature of the services you are asking GHL to provide. So that you can be clear on what data GHL will require or hold, and how we treat and store that data, GHL has developed a Data Inventory, which you can review at the end of this Privacy Notice. This can also be requested from your GHL Representative or the GHL QHSE & Compliance Lead at any time.

How does GHL use the information about Data Subjects?

Again, our use of the data you provide to us will vary, based on the relationship between you and GHL.

As an Internal Employee of GHL you can reasonably expect that GHL will use your information to carry out the administrative and management requirements of an Employer. This will include paying you your salary via your bank account, calculating and making tax and NI contributions, and ensuring that you have the tools, training and competency required to carry out your role. We will also use your data to safeguard your personal safety, health and welfare whilst at work.

As a Recruitment Candidate, you can reasonably expect that we will use your information to determine whether we can find you roles, and then share certain items of data (your name, formatted CV, training and competency information etc.) with Clients during the recruitment and placement process. We will also use your data to pay you the money you have earned whilst on assignment, calculate any relevant taxes or NI contributions, and safeguard your health, safety and welfare (so far as we are able) whilst you are on assignment with our Clients.

GHL may be required to perform and provide statistical analysis on the data that we hold and collect. Such data will normally be anonymised for this purpose, unless disclosure of individuals is a legal requirement of the process. At this point GHL would gain your consent for your personal data to be used in such a way.

Why does GHL need the information about Data Subjects?

For all of the information you provide, GHL must have a legal basis for processing the data. In almost all cases, GHL's legal basis for processing your data will be one or a combination of the following:

- Legal Obligation – your information is required for GHL to comply with any laws and/or regulations to which GHL is subject.
- Legitimate Interests – your information is required for the purposes of legitimate interests pursued by GHL or a Third Party, except where overridden by
- Contractual Necessity – your information is required for GHL to take steps at your request with a view to entering in to a contract OR for GHL to perform the contract to which you are a party.
- Consent – you have freely given your consent for GHL to process the information
- Vital Interests – processing of your information is necessary in order to protect the vital interests of the data subject, or another person, where the data subject is incapable of giving consent

GHL have indicated the legal basis behind the request for each item of personal information you supply on our Data Inventory.

How long does GHL keep the information about Data Subjects?

Different pieces of information required by GHL have different retention periods attached to them. Some of these are dictated by law i.e. basic contact and tax information must be retained for a minimum of 6 years under UK tax law. Some others are dictated by the type of information i.e. records of incidents, accidents, occupational health problems and complaints will depend on whether there are outstanding legal proceedings, and may be retained indefinitely. GHL has created our Records Retention Matrix, which you can access at the end of this Privacy Notice, as a guide to how long we store personal information. This can also be requested from your GHL Representative or the GHL QHSE & Compliance Lead at any time.



Who does GHL share information about Data Subjects with?

GHL will be required to disclose your personal information to the Global Energy Group (our ultimate parent company) in order for us to process payroll and other necessary functions provided to GHL at a Group level.

We will also be required to provide the necessary data to our Clients in order for them to consider your application during the recruitment process and, should you be accepted for an assignment, during the placement process. We will be required to share certain information i.e. Name, Date of Birth, lengths of service, with your nominated referees in order to obtain references on your behalf.

We may be required to disclose your information to Insurers and/or Professional Advisors insofar as is reasonably necessary for the purpose of obtaining or maintaining insurance coverage, risk management, professional advice or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

We may disclose certain items of information (name, date of birth, contact details, Passport or ID number, physical size or details of illness or injury) to our suppliers insofar as is reasonably necessary for the booking of travel or accommodation, personal protective equipment or occupational health services. GHL will always seek to advise you of any sharing of this information and gain your consent prior to the sharing of data, except where vital interests preclude.

In addition to the specific disclosures above, GHL may disclose your personal data where such a disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

GHG does not, has not, and shall never, sell your personal data to Third Parties for marketing purposes.

International Transfers of Your Personal Data

Your personal information is considered to be transferred across borders when it is either physically TRANSFERRED across a border, or when it is ACCESSED across borders. GHL do not currently maintain offices outside of the United Kingdom, and our hosting facilities for the servers which maintain our systems are based within the UK.

However, in the future we may conduct business with a list of international Clients, and therefore may be required to transfer personal data across borders as a requirement of the recruitment process. We may also be required to transfer data across borders in the event of an emergency situation overseas. At all times, GHL shall ensure that the transfer of personal data over an international border is protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission OR through binding corporate rules, a copy of which can be obtained via your GHL Representative or the GHL QHSE & Compliance Lead at any time. Note: under the terms of GDPR, all countries within the EEA are deemed as having adequate data protection systems in place, therefore 'international' refers to transfers outside of the EEA.

You should be aware that, when submitting personal data to GHL via a Social Media portal, this data may be available for others to view around the world. GHL cannot prevent the use (or misuse) of any such personal data by others. Your GHL Representative shall always advise of a safe and secure method to submit personal data to GHL for use by GHL in our services.

Your Data Rights

The GDPR gives you, the Data Subject, new and extended rights to control how your personal information is used.

- **Right to informed consent** – for your consent to be valid, you must know what you are consenting to. To give valid consent you must give GHIL a positive indication of your consent, through actively ticking a box or signing a document. GHIL (and other organisations) cannot accept your silence as consent, or use a pre-ticked box. However, consent is NOT the only legal basis that organisations can use to process your data. If an organisation does not need consent to process your data, they should not, and will not, ask for it.
- **Right to withdraw consent** – if you have given consent to an organisation to process your personal data, you have the right to withdraw that consent. The organisation will then need to stop processing the data that you have given them, but they can continue to process other data if they rely on another legal reason for doing so.
- **Right to object** – you have the right to object to your data being processed. The organisation can then only process your data if it has a compelling legal reason for doing so.
- **Rights in relation to automated decision making or profiling** – you have the right not to be subject to a decision based purely on automated processing, unless you have given your explicit consent. If the process is not fully automated, the organisation will not need your consent. GHIL does not make use of fully automated decision making or profiling in our services, but Recruitment Candidates may be shortlisted based on matching certain criteria. This process is always given final review by a Recruitment Specialist.
- **Right to make a Subject Access Request (SAR)** – A Subject Access Request is where you ask the organisation holding your data to provide you with a copy of the data they hold. If you make an SAR to GHIL, we will respond within a month. In certain situations we may be required to extend this period to 2 months, but we will keep you informed of any progress. GHIL will not normally charge you for making an SAR, however, if you make repeated requests for the same information OR the volume of information you are requesting is excessive, GHIL may require to charge you a nominal fee for administration of your request. GHIL can also refuse to comply with your request for the same reasons, but we will always inform you.
- **Right to data portability** – where technically possible, you have a right to have your personal data transferred directly from one organisation to another. However, this does not include having your data passed to another organisation without your knowledge. The data must be supplied in a structured, commonly used and machine readable form.
- **Right of rectification** – if an organisation holds inaccurate or incomplete data for you, you have the right to request that the organisation corrects this. Any organisation you ask to correct your data should do this within one month. Usually within GHIL we can rectify most data held instantly, but some things may take slightly longer (i.e. Tax Codes, Bank Details already submitted to Payroll). Your GHIL Representative will always double check important information with you, and will ask whether anything needs to be updated at regular intervals. If you change data that you know GHIL will require to provide service to you (i.e. telephone, email, bank details etc.) you should inform us as soon as possible.

- **Right to erasure** – this is also known as the ‘**right to be forgotten**’. You can request that the organisation removes all of your personal data. This is not, however, an absolute right. The organisation can retain your data should they have a legal reason for doing so. If you ask GHL to erase your data, we may ask you whether you just want to be marked as ‘unavailable’ or ‘not interested’ for a period of time OR whether you want to be permanently deleted.

We cannot retain a list of people who have requested permanent deletion, therefore you may still be contacted at a later stage if you remain actively involved in job boards or social media.

If you tell GHL that you wish your data to be forgotten, GHL will be required to contact any third parties we have passed your data to (i.e. Clients or Awarding Bodies), and inform them that you have filed a request to be erased. These third parties must also do the same.

Note: GHL are required to keep certain records, such as ID, right to work checks, payroll records, health surveillance or training awards, for certain periods of time. These obligations will override any request to erase data or any objections to processing, for so long as we are required to keep the data. We indicate these periods on our Data Inventory and Retention Matrix (included with this Privacy Notice), just so you can be clear that erasure cannot always be instant.

- **Direct marketing** – an organisation **MUST** have your express consent to send you direct marketing. Therefore if GHL launches any further services other than recruitment, we must have your permission to send you information about it.
- **Data breaches** – if an organisation suffers a data breach (e.g. a loss or theft of personal data), they must inform the Information Commissioner’s Office (ICO). If there is a high risk to you, the organisation must also tell you about the breach.

All of your rights as a Data Subject are fully outlined on the [ICO’s website](#), or you can contact your GHL Representative or the QHSE & Compliance Lead for further information.

Who can you contact about Your Personal Data?

Your first point of contact regarding anything to do with the personal data GHL holds about you, is your main point of contact within GHL. This may be the Recruitment Specialist you are in contact with, or the Business Support Team who are arranging logistics or training for you. For Internal Staff this will be your Line Manager, or personnel from the Group Payroll Team. GHL will always advise you of whom to contact in the event of a problem.

At all times, you can also contact the GHL QHSE & Compliance Lead, who Senior Management have appointed as the ultimate person with responsibility for Personal Data within GHL.

Name: Emma Christie
Role: QHSE & Compliance Lead
Tel: +44 (0) 1224 356 586
Email: emma.christie@gegroupp.com
Address: Global Highland Ltd
Marine House
5B International Avenue
ABZ Business Park
Dyce
Aberdeen
AB21 0BH



If you are still not satisfied with the level of response from GRML, on any aspect regarding the processing and control of your personal data, the Global Energy Group has in place an escalation point at a Group level. You can use the below email or postal address to escalate anything you feel the GRML Data Controller has NOT successfully resolved:

Email: dataprotection@geggroup.com
Address: Data Protection Dept.
Global Energy
13 Henderson Road
Inverness
IV1 1SN

If you wish to take the matter even further, you can contact the Information Commissioner's Office (the ICO). You can do this via their website (www.ico.org.uk), where you have the ability to live chat with someone who will try to address your concerns. You can also call the ICO's helpline on **0303 123 1113**.

When you contact the ICO, you can use GHIL's Organisation Reference (ZA146778) to assist you. All organisations processing personal data should be able to supply you with their ICO reference, and you can check that this is valid at any time by searching the ICO's Register of Data Controllers.

What else can you do to protect Your Personal Data?

GHIL's QHSE Handbook will detail some steps you can take as an individual to protect your personal data from unauthorised use or misuse. In our Induction we recommend that you NEVER save your log-in or password to any social media or internet banking website to any workplace or public access computers, and that you fully log out of any session before walking away from the computer. You may wish to consider additional security on your personal electronic devices, including fingerprint ID or PIN codes. You can adjust your internet browser settings to stop accepting text files known as 'cookies' which may be tracking and logging details of your online activities, and remove cookies from your computer, just be aware that some websites and website features, including GHIL's, may not function properly as a result.

Please be aware that this Privacy Notice only applies to GHIL, our processes, procedures and websites. You should ALWAYS make yourself aware of any Privacy Notice for any other party who may hold your data, including websites that GHIL may ask you to link to, prior to submitting any data.

Changes & Updates

GHIL keep this Privacy Notice under regular review, and you will be advised of any updates, either by a direct email with a copy of the Privacy Notice OR through our website. This Privacy Notice was last updated on 18th May 2018.

A handwritten signature in black ink, appearing to read 'Jia MacKenzie'.

Jia MacKenzie
Managing Director

GLOBAL HIGHLAND LTD - DATA INVENTORY

WHY	WHO	WHAT			WHEN					AVAILABLE TO	
		TYPE	SOURCE	LEGAL BASIS	ORIGINALLY	UPDATED	RETENTION PERIOD	EXCEPTIONS	DETERMINED BY		
Performance of GH Services & Assignee/Candidate Admin	SPECULATIVE RECRUITMENT CANDIDATES	Name Address Contact Details CV Other Application Documents	Individual	Legitimate Interests (Reasonable Expectation - Provision of Service)	First Contact	On Registration	Duration of Purpose	If suitable, progress to Registration, if Unsuitable destroy	Standard Practice	GHL Recruitment Team, GHL Business Support Team, GEG IT Support, Other GEG Group Recruiters	
	ALL Registered Recruitment Candidates	Name DOB Place of Birth Vantage Number (as required) Address Contact Details CV Current Certificates & Qualifications Expired Certificates & Qualifications Identification (inc. Passport) RTW Documents Driving Licence / CPC Card / Digital Taco Card (as required) CSCS / CPCS Card (Construction)	Individual	Contract / Legal Obligation	Registration	As Required	See Records Retention Matrix (Split by Activity/Purpose)	Ongoing Litigation (Processing Stopped)	Employment / Limitation Law		GHL Recruitment Team, GHL Business Support, GHL QHSE, GHL Accounts & Payroll, GRML Recruitment Team, GRML Business Support, GRML Accounts & Payroll, GEG ICON Recruitment Team, GEG ICON HR Support, GEG IT Support, Microdec Profile IT Support, Clients (Data Transfer or at Audit), External Auditors, Logistics Suppliers, Training Providers, Occupational Health Service Providers, GHL Insurers (Data Transfer), Government Agencies (Data Transfer or Legal Notification), GEG Company Pension Provider
	ALL ASSIGNED Recruitment Candidates (i.e. WORKING)	Health Surveillance Records (inc. OMQ) Bank Account Details Special Dietary Requirements References Competency & Performance Records Tax & NI Records Pension Details Basic Disclosure Scotland Certificate (Role dependent)	Individual Individual / Third Party Individual / GEG Payroll Individual / Third Party	Contract / Legal Obligation Legitimate Interests (Assignee Management)	On Assignment On Assignment On Assignment On Assignment On Assignment On Assignment	As Required No	Min. 40 years post last form Duration of Purpose 3 years post relevant Tax Year 6 years Duration of Assignment	Confirmed Non-Work Related Death Ongoing Litigation Employment / Tax Law Health & Safety Law Employment / Limitation Law Tax Law The Pensions Regulator Disclosure Scotland	Health & Safety At Work Act Employment / Tax Law Health & Safety Law Employment / Limitation Law		
	LTD Co Assignees	Ltd Company Registration Ltd Company VAT Registration Ltd Company Insurances	Individual / Third Party List (Companies House / VIES)	Contract / Legal Obligation	On Assignment	Upon Change Upon Expiry	6 years	Ongoing Litigation	The Companies Act		
Staff Admin	Internal Staff	Name DOB Address Contact Details CV Certificates & Qualifications Identification (inc. Passport) RTW Documents Health Surveillance Records (inc. OMQ) Bank Account Details	Individual	Contract / Legal Obligation	At Start of Recruitment Process	As Required	Retained for 6 Years Post-Termination	Ongoing Dispute / Litigation	Employment / Limitation Law	GHL Senior Management, GHL HR Support, GEG IT Support, External Auditors, Logistics Suppliers, Training Providers, Occupational Health Service Providers, GHL Insurers, GEG Accounts & Payroll, GEG Company Pension Provider, Government Agencies (Data Transfer or Legal Notification),	
		References Competency & Performance Records Annual Leave Sickness Absence Tax & NI Details Pension Details	Individual / Third Party Individual / GEG Payroll	Legitimate Interests (Staff Management) Contract / Legal Obligation	On Appointment On Appointment	No	Min. 40 years post last form 6 Years 6 Years Post-Termination	Health & Safety At Work Act Employment / Limitation Law	Health & Safety At Work Act Employment / Limitation Law		
		Pre-Appointment At the Time On Appointment	No As Required	6 Years Post-Termination 6 years	Ongoing Dispute / Litigation	Employment / Limitation Law Tax / Limitation Law					
In Case of Emergency	Emergency Contact (ALL) Next of Kin (ALL)	Name Contact Details	Individual / Third Party	Vital Interests	On Assignment / Appointment	As Required	Delete on Termination	No Business Requirement - Moral Obligation	All with Database Access (Assignees), GHL HR (GHL Staff)		
Performance of GH Services	Client Companies (Existing)	Registered Name Registered Address Operations Address(es) Company Registration VAT Details Bank Account Policies & Procedures	Individual	Legitimate Interest (Performance of Service)	First Contact	As Required	6 Years	Ongoing Litigation	The Companies Act / Limitation Law	All with Database Access, GHL/GEG Accounts, GEG IT Support, GEG Insurers, External Auditors, Government Agencies	
	Client Contacts (Existing)	Name Title Work Address Work Email Work Mobile Work Phone	Individual	Legitimate Interest (Performance of Service)	First Contact	As Required	End of Relationship	Ongoing Litigation	GDPR		
Records of Previous Performed Services	Client Companies (Former)	Registered Name Registered Address Operations Address(es) Company Registration VAT Details Bank Account Policies & Procedures	Individual	Legitimate Interest (Performance of Service)	First Contact	No	6 Years	Ongoing Litigation	The Companies Act / Limitation Law		
	Client Contacts (Former)	Name Title Work Address Work Email Work Mobile Work Phone	Individual	Legitimate Interest (Performance of Service)	First Contact	No	End of Relationship	Ongoing Litigation	GDPR		
Marketing Activity	Client Companies (Potential)	Registered Name Registered Address Operations Address(es) Company Registration	Internet / Social Media / Third Party List	Legitimate Interest (Performance of Service)	Introduction by Third Party / Business Development Activity / Association Membership	As Required	Consent Withdrawn		GDPR		
	Client Contacts (Potential)	Name Title Work Address Work Email	Internet / Social Media / Third Party List	Legitimate Interest (Performance of Service)	Introduction by Third Party / Business Development Activity / Association Membership	As Required	Consent Withdrawn		GDPR		

WHY	WHO	WHAT			WHEN					AVAILABLE TO
		TYPE	SOURCE	LEGAL BASIS	ORIGINALLY	UPDATED	RETENTION PERIOD	EXCEPTIONS	DETERMINED BY	
Performance of Service to GHL	Suppliers	Work Mobile Work Phone Registered Name Registered Address Operations Address(es) Company Registration VAT Details Bank Account Insurances Supplier Contact Name(s) Work Address Work Email Work Mobile Work Phone Policies & Procedures	Individual / Internet / Third Party List (Companies House / VIES)	Legitimate Interest (Provision of Service / Control of Approved Suppliers)	Prior to Engagement to Provide Services/Products (Approved Supplier Process)	As Required (Min. Annually from creation, as long as relationship exists)	End of Relationship	Ongoing Litigation / Safety Critical Supply	Business Requirement	

Data Record Type	Source	Treatment	CONSENT POINT	Retention Period										
				None	6m	1 yr	3 yrs	6 yrs	6yrs+	40 yrs	Exceptions	Protocol		
Speculative CV / Application / Enquiry (ALL SERVICES)	Individual / Third Party List / Social Media	Review	NO - Legitimate Interest. Contact initiated by Data Subject in regards work-finding services	X (GHL will only store Speculative Applications for a period of 7 days before Registration or Destruction MUST take place)									None	1
	Email Enquiry, Electronic CV Copy, Physical CV Copy, Telephone Call (Physical Notes), Application via Website, Contact via Social Media portal	Candidate suitable for Registration = Progress to registration phase Candidate unsuitable for Registration = Inform Candidate and destroy any submitted personal details. Client need matches ongoing service provision = Progress to Registration Client need does not match current service provision = Review with Senior Management regarding expansion opportunity No expansion opportunity = decline and delete												
Emergency Contact & Next of Kin	Individual / Third Party	Store, Maintain & Review	YES - Ensure Privacy Notice supplied and Ongoing Consent recorded through usual Record Maintenance	X (Upon Termination of Relationship)									None	1
	Name, Contact Details, Relationship *NOTE - THIS IS REQUESTED FROM THE CANDIDATE / STAFF MEMBER WHO WILL BE PROMPTED TO ENSURE CONSENT HAS BEEN GIVEN TO THEM BY THE PERSON NAMED AS ECI/NOK*	Emergency Contact and Next of Kin details shall only be retained as long as there is a valid reason to do so. Upon end of relationship, ECI and NoK details should be destroyed. All persons requiring ECI or NoK information shall be reasonably expected to update GHL with changes, and will be prompted pre-mobilisation (Assignees) or on regular HR File Review (GHL Staff)												
Potential Clients (Marketing Activity)	Individual / Third Party List / Social Media / Internet	Store, Maintain & Review	NO - Legitimate Interest. Ensure Privacy Notice is supplied and update via usual Record Maintenance process	X (Upon Withdrawal of Consent)									None	1
	Organisation Details (Public Record), Contact Name(s), Contact Details, Operational and Site Addresses, Financial Details	Where GHL targets a relationship with a potential Client, basic records will be held until such time as the Client Contact withdraws consent for GHL to hold the information. Information will be reviewed, expanded and updated as/when the Client organisation confirms a business relationship with GHL and they become an Active Client.												
Registered Recruitment Candidate (No Placement Activity)	Individual	Store, Maintain & Review	NO - Contractual Necessity/Legal Obligation. Ensure Privacy Notice is supplied and update via usual Record Maintenance process	X (Bank Details, ECI, NoK if supplied)			X (Post-Creation)					X (Health Surveillance, Incident Records, Complaint Records)	Outstanding Litigation	2
	Name, Date of Birth, Place of Birth, Vantage Number (as required), Address, Contact Details (telephone & email), CV, Current/Expired Certificates and Qualifications, Identification documents, Right to Work documents, (Health Surveillance, Emergency Contact, Next of Kin, bank account details MAY BE SUPPLIED BUT NOT REQUIRED AT THIS STAGE)	Maintain contact with Candidate regarding recruitment activity i.e. roles, availability etc. If no contact from Candidate (or receive 'unavailable' from contact details) to consent to further involvement in the recruitment and placement process within 1 year from creation, inform Candidate of removal from database. No Candidate response regarding removal within 1 month of notification = destroy any physical records and remove / destroy any electronic records.												
Registered Recruitment Candidate (Placement Activity)	Individual	Store, Maintain & Review	NO - Contractual Necessity/Legal Obligation. Ensure Privacy Notice is supplied and update via usual Record Maintenance process	X (Bank Details, ECI, NoK)		X (Basic Details -Post-Placement)	X (Tax & NI Records - Post-Tax Year)	X (Ltd Company Records -Post-Tax Year)				X (Health Surveillance, Incident Records, Complaint Records)	Outstanding Litigation	3
	As above + bank account details, Emergency Contact, Next of Kin, special dietary requirements, references, competency & performance records, tax & NI records, pension details, health surveillance records, incident records, complaints records, (+ Ltd Company Registration, Ltd Company VAT Registration, Ltd Company Insurances)	Maintain contact with Candidate regarding placement activity i.e. payroll, client feedback, candidate feedback, further roles, availability etc. Should Candidate request removal from database, gain a permanent placement within a Client or otherwise require removal from database												
Internal Staff	Individual	Store, Maintain & Review	NO - Contractual Necessity/Legal Obligation. Ensure Privacy Notice is supplied and update via usual Record Maintenance process	X (Bank Details, ECI, NoK)				X (Post-Termination)				X (Health Surveillance, Incident Records, Complaint Records)	Outstanding Litigation	3
	Name, Date of Birth, Address, Contact Details, CV, Certificates & Qualifications, Identification, RTW Documents, Health Surveillance Records, Bank Account Details, References, Competency & Performance Records, Annual Leave, Sickness Absence, Tax & NI Details, Pension Details	Staff Records will be maintained as long as the Staff Member remains with the organisation. Transfer to other Group Companies will result in transfer of information to that company. Upon termination of employment, Bank Details, ECI and NoK should be immediately destroyed. All other records will be maintained within the scope of limitation according to applicable laws.												
Active Clients	Individual	Store, Maintain & Review	NO - Legitimate Interest / Contractual Necessity. Ensure Privacy Notice is supplied and update via usual Record Maintenance process						X (End of Relationship)			X (Health Surveillance, Incident Records, Complaint Records)	Outstanding Litigation	3
	Organisation Details (Public Record), Contact Name(s), Contact Details, Operational and Site Addresses, Financial Details, Tax & NI Records, Policies & Procedures	It is a reasonable expectation that Clients with whom there is an ongoing business relationship will maintain communication regarding work-based data and updates to this data as required. GHL shall deactivate Client Contacts who leave the Client organisation, Contacts who move to a different Client organisation shall be moved etc. GHL shall NOT hold personal details for Client Contacts, unless said Contact is also a Recruitment or Training Candidate of GHL.												
Former Clients	Individual	Store, Maintain & Review	NO - Legitimate Interest / Public Record						X (End of Relationship)			X (Health Surveillance, Incident Records, Complaint Records)	Outstanding Litigation	3
	Organisation Details (Public Record), Contact Name(s), Contact Details, Operational and Site Addresses, Financial Details, Tax & NI Records, Policies & Procedures	Where a Client relationship lapses, GHL will retain information only as long as indicated by the prior business relationship (i.e. placement records = 6 years tax purposes). If a Client Organisation MERGES into another existing Client, GHL shall process this and ensure updated information is obtained for ALL remaining Contacts at the organisation. Where a Client organisation ceases to function entirely, GHL will retain information only as long as indicated by the prior business relationship (i.e. placement records = 6 years tax purposes).												
Supplier	Individual	Store, Maintain & Review	NO - Legitimate Interest / Contractual Necessity. Ensure Privacy Notice is supplied and update via usual Record Maintenance process						X (End of Relationship)			X (Health Surveillance, Incident Records, Complaint Records)	Outstanding Litigation	3
	Organisation Details (Public Record), Contact Name(s), Contact Details, Operational and Site Addresses, Financial Details, Tax & NI Records, Insurances, Policies & Procedures	Where a Client relationship lapses, GHL will retain information only as long as indicated by the prior business relationship (i.e. placement records = 6 years tax purposes). If a Client Organisation MERGES into another existing Client, GHL shall process this and ensure updated information is obtained for ALL remaining Contacts at the organisation. Where a Client organisation ceases to function entirely, GHL will retain information only as long as indicated by the prior business relationship (i.e. placement records = 6 years tax purposes).												

Deletion Protocol Key

Level	Description
1	Total physical destruction and electronic deletion
2	Immediate destruction physical copies, removal of electronic contact information, bank details, total deletion 1 year post-creation
3	Layered destruction, based on data type and legislative requirements