

SNIPEF Holidays with Pay, Sick Pay & Benefits Schemes including PLUTOS Holidays 1972 Ltd. Privacy Notice (SNIPEF Pay and Benefits Schemes)

SNIPEF Pay and Benefits Schemes takes your privacy very seriously. This Privacy Notice is intended to set out your rights and answer any queries you may have about your personal data. If you need more information, please contact info@snipef.org

Our personal information handling policy and procedures have been developed in line with the requirements of the 1995 European Union Data Protection Directive (Directive 95/46/EC) and the General Data Protection Regulation (in force from 25 May 2018) and applicable national law.

1. What information do we collect?

We collect and process personal data about you when you have subscribed to the schemes as an Employer or as an Employee have been subscribed by your Employer or you are attached to SNIPEF Pay and Benefits Schemes for legal purposes or by association. The personal data we process includes:

- your name
- employer or employee
- your grade or position in company
- your hourly pay rate
- your holiday type
- your normal working hours
- subscribed to holiday and sickness or sickness only
- your home or work address, email address and/or phone numbers;
- your job title
- NI Number
- date of birth
- communications and correspondence
- bank account details

2. How do we use this information and what is the legal basis for this use?

We process the personal data listed above, in accordance with our legitimate interests, for the following purposes:

- as required to fulfil the services we supply for Holiday Pay and Sickness Benefits
- to comply with applicable law and regulation;
- to protect SNIPEF Pay and Benefits Schemes' legitimate business interests and legal rights, including but not limited to, use in connection with legal claims, compliance, regulatory and investigative purposes (including disclosure of such information in connection with legal process or litigation);
- to respond to any comments or complaints we receive from you, and/or to investigate any complaints received from you
- to personalise (i) our communications to you; (ii) our website; and (iii) member services for you
- if you provide a credit or debit card, we may also use third parties (such as POS payment providers) to check the validity of the sort code, account number and card number you submit in order to prevent fraud, in accordance with our legitimate interests and those of third parties

- we may monitor any customer account to prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime, in accordance with applicable law.

We may also send you direct marketing in relation to relevant products and services. Electronic direct marketing will only be sent where you have given your consent to receive it, or (where this is allowed) you have been given an opportunity to opt-out. You will continue to be able to opt-out of electronic direct marketing at any time by following the instructions in the relevant communication.

3. With whom and where will we share your personal data?

We may share your personal data with our associated companies to process it for the purposes of inter-group administration to deliver products or services. We may also share your personal data with the below third parties:

- our professional advisors such as our auditors and external legal and financial advisors
- Employers, associated organisations and HMRC where they have agreed to process your personal data in line with this Privacy Notice

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if needed for the legal protection of our legitimate interests in compliance with applicable laws. Personal data may also be shared with third party service providers who will process it on behalf of SNIPEF Pay and Benefits Schemes or the purposes above. Such third parties include, but are not limited to, providers of website hosting, maintenance and identity checking.

4. How long will you keep my personal data?

We will not keep your personal information for any purpose for longer than is necessary and will only retain the personal information that is necessary in relation to the purpose. We are also required to retain certain information as required by law or for as long as is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions.

Where you are an Employer or Employee we will keep your information for the length of any contractual relationship you have with us and after that for any length of period required to comply with the criteria related to membership, employment or other associated interests.

In respect of prospective Employer or Employee, and where you have expressly consented to us contacting you, we will only retain your data:

- until you unsubscribe from our communications

or if you have not unsubscribed:

- while you interact with us and our content or
- if your information is required to be held for the purposes of membership, employment or legal reasons.

We will retain your data for a short time beyond the specified retention period, to allow for information to be reviewed and any deletion to take place. In some instances, laws may require SNIPEF Pay and Benefits Schemes to hold certain information for specific periods other than those listed above.

5. Where is my data stored?

The personal data that we collect from you is stored on our servers within the UK.

6. What are my rights in relation to my personal data?

You have the right to ask us not to process your personal data for marketing purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data, clicking the unsubscribe button on any communication we have sent to you or by contacting us.

Where you have consented to us using your personal data, you can withdraw that consent at any time.

If the information we hold about you is inaccurate or incomplete, you can notify us and ask us to correct or supplement it.

You also have the right, with some exceptions and qualifications, to ask us to provide a copy of any personal data we hold about you.

Where you have provided your data to us and it is processed by automated means, you may be able to request that we provide it to you in a structured, machine readable format.

If you have a complaint about how we have handled your personal data, you may be able to ask us to restrict how we use your personal data while your complaint is resolved. In some circumstances you can ask us to erase your personal data:

- a) by withdrawing your consent for us to use it
- b) if it is no longer necessary for us to use your personal data
- c) if you object to the use of your personal data and we don't have a good reason to continue to use it
or
- d) if we haven't handled your personal data in accordance with our obligations.

7. Where can I find more information about SNIPEF Pay and Benefits Schemes handling of my data?

Should you have any queries regarding this Privacy Notice, about SNIPEF Pay and Benefits Schemes processing of your personal data or wish to exercise your rights you can contact us on info@snipef.org. If you are not happy with our response, you can contact the Information Commissioner's Office: <https://ico.org.uk/>