



PRIVACY NOTICE

Wellington Ford Financial Ltd understands its obligations in regard to your fundamental right to a private life and has implemented systems and controls to ensure your rights and freedoms are protected.

Wellington Ford Financial Ltd undertakes to meet its obligations under the UK's Data Protection Act, the Privacy and Electronic Communications Regulations and the EU General Data Protection Regulation (GDPR).

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| WHAT PERSONAL DATA DO WE COLLECT? | <p>Wellington Ford Financial Ltd will collect the following data, dependent upon the role required: Name, address, date of birth, current address plus address history, contact telephone numbers, email address, passport, visa information, driving licence information, car registration number, criminal record information (and information required to complete this process), health information, next of kin information, reference information and credit check information. Different variations of data are required dependent upon the job specification so we may not be required to collect all of the data listed above for all staff roles.</p> |
| HOW WE COLLECT YOUR PERSONAL DATA | <p>You directly provide Wellington Ford Financial Ltd with the data and we collect by the following methods: Original physical copy, scanned certified email copy, scanned certified postal copy.</p> |
| WHO WILL PROCESS YOUR PERSONAL DATA? | <p>Your personal data will be processed by Wellington Ford Financial Ltd. Access to your personal data is permitted only for those employees who require it to fulfil their responsibilities on your behalf. All parties will process your personal data in accordance with this Privacy Notice. All parties are subject to information security training to enforce and communicate best practice when handling information.</p> |
| WHY IS YOUR PERSONAL DATA REQUIRED? | <p>Your personal data is required to enable us to take necessary steps at your request prior to entering into a contract of employment and to perform such a contract. Dependent upon role, this may include identity and age verification checks, credit checks, referencing checks, criminal record checks, preventing and detecting fraud, money laundering or other crimes and any other requirements in accordance with rules set by the Financial Conduct Authority (FCA) or other employment legislation.</p> |

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| <p>WHAT HAPPENS IF WE WANT TO PROCESS YOUR PERSONAL DATA FOR OTHER REASONS?</p> | <p>Though there are some legal exceptions, if we wish to process your personal data for any other unrelated purpose than those we have informed you about we will notify you.</p> |
| <p>WHAT ARE THE CONSEQUENCES IF YOU DO NOT PROVIDE YOUR PERSONAL DATA?</p> | <p>Your personal data is essential to enable us to take steps at your request prior to entering into a contract or to perform a contract to which you are a party. Without this information we will not be able to proceed to provide employment.</p> |
| <p>WHAT MAKES THE PROCESSING LAWFUL?</p> | <p>Because the processing is necessary:</p> <ul style="list-style-type: none"> • Consent. You can remove your consent at any time by contacting our Data Protection Representative (details below) • For the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract • for compliance with a legal obligation to which we are subject • for the purposes of the legitimate interests pursued by us. |
| <p>KEEPING YOUR PERSONAL DATA UP TO DATE</p> | <p>We will record your data exactly as you provide it. You may ask us to update it at any time and we will action your request promptly and notify relevant third parties of any changes.</p> |
| <p>WHAT ABOUT SENSITIVE PERSONAL DATA?</p> | <p>We only process sensitive personal data</p> <ul style="list-style-type: none"> • because it is necessary for reasons of substantial public interest • to carry out obligations in the field of employment • to protect your vital interests e.g. we may pass on information about medical conditions to paramedics if you are unable to give consent due to illness. <p>Sensitive personal data may include data revealing racial or ethnic origin, data concerning health or data relating to criminal convictions or offences.</p> |

HOW WILL WE FURTHER USE YOUR PERSONAL DATA (OUR LEGITIMATE INTERESTS)?

- To contact you to ensure that our records of your personal information are correct
 - To respond to questions or grievances you have about employment
 - To process any expense payment due to you
 - To review, improve and develop employment conditions or handle complaints
 - To pursue debts
 - To evidence company practices
 - To evidence the standards and processes carried out conform to the company's ethical standards and expectations
 - To protect the business from risks which might be introduced by an individual
 - To raise awareness about other opportunities within the company
 - To provide references to prospective employers when you have named us as a referee.
- You have the right to object to processing for these purposes and we shall cease unless we can show we have compelling legitimate grounds to continue.

PROCESSING WHEN PERFORMING A TASK CARRIED OUT IN THE PUBLIC INTEREST

We will use your personal data to protect members of the public against dishonesty, money laundering or fraudulent activities. This must necessarily be carried out without your explicit consent to ensure this function is not prejudiced. Part of this processing may involve verifying your identity using third parties such as GB Group Plc or Creditsafe Business Solutions Ltd.

WHAT PERSONAL DATA IS REQUIRED?

We only collect personal data that is necessary to carry out the purposes listed above. This includes data you supply and data we receive from reference agencies. Where practical and lawful we will inform you about any of your personal data we receive from third parties that you may be unaware of.

HOW SECURE WILL YOUR PERSONAL DATA BE?

We will ensure that your personal data is only accessible to authorised people in our firm and will remain confidential at all times. Appropriate security measures are in place to prevent unauthorised access, alteration, disclosure, loss, damage or destruction of your information. If we have a contract with another organisation to provide us with services or a service on our behalf to process your personal data, we'll make sure they give reassurances regarding appropriate security measures in place and only process your data in the way we've authorised them to. These organisations won't be entitled to use your personal data for their own purposes. If necessary, our security teams will check them to make sure they meet the security requirements we've set. Please contact our Data Protection Representative below if you would like further information.

WILL WE SHARE YOUR PERSONAL DATA WITH ANYONE ELSE?

We may share your personal data with:

- Appropriate staff such as those who carry out financial or compliance functions.
- Organisations that need your data because we are required to provide it by law (e.g. The FCA, HMRC, etc.).
- Organisations that help us process your personal data to establish your personal characteristic. This is necessary if we are to provide you with the best possible advice and service.
- Organisations that carry out credit references or identity checks such as GB Group Plc or CreditSafe Business Solutions Ltd. These organisations may keep a record of the information and may disclose the fact that a search of its records was made to its other customers for the purposes of assessing the risk of giving credit, to prevent fraud and to trace debtors.
- Sometimes other authorised firms with specialist advisers, such as pension specialists, who assist us in providing pension schemes. You will be provided with their details if this applies.
- Law enforcement agencies, courts or other public authorities if we have to, or are authorised to by law.
- Our bank to enable payment of salaries and benefits.
- Our expense payment provider to enable payment of any work-related expenditure owed to you.
- Where we go through a business transaction, such as a merger, being acquired by another company or selling a portion of its assets, your information will, in most instances, be part of the assets transferred.

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| | <ul style="list-style-type: none"> • Companies or organisations requesting a reference where you have named us as a referee. |
| <p>TRANSFERRING DATA OUTSIDE THE UK / EUROPEAN UNION</p> | <p>We do not usually transfer any of your personal data outside of the UK or EU except when we need to perform pre-contractual measures (credit and identity checks) or because the checks we request are necessary for important reasons of public interest. Some companies, like GB Group Plc, may transfer data outside of the EU to countries which do not, in the view of the EU Commission, offer an adequate level of protection. In such cases GB Group Plc encrypts any data it sends to other agencies and only transfers data necessary to carry out checks where there is a link with a person to a particular country. <i>(A list of countries used to perform checks include Germany, Netherland, Belgium, France, Sweden, Norway, Finland, Luxembourg, Switzerland, Liechtenstein, Spain, USA, Estonia, Latvia, Lithuania, Poland, Slovakia, Czech Republic, Hungary, Slovenia, Bosnia, Serbia, Montenegro, Croatia, Macedonia, Kosovo, Albania, Bulgaria, Romania, Ukraine, Austria, Denmark, Moldova, Portugal, Italy, Canada, Brazil, Greenland, China, India, Australia, Russia, South Korea, Taiwan, Mexico, South Africa, New Zealand, Hong Kong, UK.)</i></p> <p>Furthermore, we will occasionally use third parties for the processing of personal data in third countries. However, we shall put in place appropriate safeguards to ensure your data is safe before such transfers.</p> |
| <p>WHAT ABOUT DIRECT MARKETING?</p> | <p>We will not use your personal data to carry out direct marketing activities.</p> |
| <p>AUTOMATED DECISION-MAKING PROCESSES</p> | <p>We sometimes use automated processes when making decisions but you will not be subject to a decision based solely on automated processing, including profiling.</p> |
| <p>TELEPHONE CALL RECORDING</p> | <p>In line with The Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000 we may record incoming or outgoing telephone conversations for the following purposes:</p> <ul style="list-style-type: none"> • Establishing facts and evidence for business transactions • Ensuring compliance with regulatory or self-regulatory practices • Ascertaining and demonstrating that standards are being met • Preventing or detecting crime • Investigating or detecting the unauthorised use of that or any other telecommunication system • Safeguarding the effective operation of the telecommunications system. |



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| EMAIL MONITORING | <p>The company accepts that the use of email is a valuable business tool. However, misuse of this facility and other systems can have a negative impact upon employee productivity, the reputation of the business and the rights of data subjects. All of the company's email resources are provided for business purposes. Therefore, the company maintains the right to examine any systems and inspect any data recorded in those systems.</p> <p>In order to ensure compliance with the Information Technology Policy and appropriate data protection measures, the company reserves the right to use monitoring software for its email systems. Monitoring of systems is for legitimate purposes only, such as preventing data loss or unauthorised processing, and may be carried out routinely to establish potential misuse or a data breach. However, to ensure privacy rights are upheld, accessing the content of emails will only be undertaken if there is a suspicion of improper use and only after the authorisation of two company directors.</p> |
| HOW LONG WILL WE KEEP YOUR PERSONAL DATA FOR? | <p>Your personal data may be kept for 6 years after your employment ceases. We will not keep your data for longer than is necessary.</p> |
| REQUESTING A COPY OF THE PERSONAL DATA WE HOLD | <p>You may at any time ask for a copy of the personal data we hold about you – it is your legal right. We will provide you with a copy of any non-exempt personal data within one month unless we ask you for an extension of time. To protect your personal data, we will ask you to verify your identity before we release any personal data. We may refuse your request if we are unable to confirm your identity.</p> |
| IMPORTANT RIGHTS | <p>You have the right, on grounds relating to your situation, at any time to object to processing which is carried out as part of our legitimate interests or in the performance of a task carried out in the public interest. We will no longer process your data unless we can demonstrate there are compelling legitimate grounds which override your rights and freedoms or unless processing is necessary for the establishment, exercise or defence of legal claims.</p> <p>You have the right to object at any time to processing your personal data for marketing activities. In such a case we must stop processing for this purpose.</p> |

WHAT ARE YOUR OTHER LEGAL RIGHTS?

In addition to the rights above the additional following rights:

- You have the right to request from us access to and rectification or erasure of personal data or restriction of processing concerning your data
- You have the right to receive data you have provided to us in a structured, commonly used and machine readable format
- You have the right to lodge a complaint with the regulator (see below).

To exercise any of these rights please contact our Data Protection Representative

HOW TO CONTACT OUR DATA PROTECTION REPRESENTATIVE

You can contact our data protection officer about any data protection issues by:

- Writing to:
The Data Protection Representative,
**Hardwicke House, Green Barn Farm,
Selborne Road, Alton. GU34 3HL**
- Telephoning: 01628 636858
- Emailing: paulwellington@wellingtonford.co.uk

HOW DO YOU MAKE A COMPLAINT TO THE REGULATOR?

- By writing to:
**Information Commissioner's Office,
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire,
SK9 5AF**

- By telephoning: **0303 123 1113**
- By emailing: **casework@ico.org.uk**
- By using their website:

<https://ico.org.uk/for-organisations/report-a-breach/>