

## 1 Scope

This policy applies to all employees of MWH Treatment and MWH Farrer.

The purpose of this policy is to show that MWH Treatment complies with both the letter and spirit of the law on Data Protection rights.

## 2 Application

This policy aims to inform employees of what Personal Data they must provide to the Company as a minimum, and how the Company may use their Personal Data for valid business reasons only.

## 3 Contents

- What personal information all employees must provide to the Company.
- How to notify the Company of any changes to your personal details.
- What the Company means by terms [Personal Data](#), [processing](#) and [Sensitive Personal Data](#).
- Abridged definitions of terms from Parts 1 and 2 of the Data Protection Act 2018.
- What the Company may use your Personal Data and Sensitive Personal Data for.
- How the Company justifies that it's use of personal data is valid.

## 4 Personal Details

### 4.1 What information must I provide the Company?

All employees must provide the Company with all information that is reasonably required in connection with your employment, this includes:

- Next of kin.
- Permanent Address.
- Bank details.
- A change in any of the above.

### 4.2 How do I notify the Company of any changes to my personal information?

To notify the Company of any changes to your personal information you must put your changes in writing to your HR Team.

Unless and until the Human Resources Team is informed in writing of any personal information changes, communications that are sent to the employee at the address held on the system will be deemed to be received by them.

It is the responsibility of the employee to ensure that they receive post sent to them by the Company at the address given to Human Resources via written notification.

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## 5 Data Protection

### 5.1 What does the Company mean by terms "Personal Data", "processing" and "Sensitive Personal Data"?

For the purposes of this policy, the terms **Personal Data**, **processing** and **Sensitive Personal Data** have the meanings set out in Parts 1 and 2 of the Data Protection Act 2018.

Without reproducing the definition in full, abridged definitions are:

- **Personal Data** includes any information from which you could be identified.
- **Sensitive Personal Data** includes information about your ethnic origin, health, sexual orientation, politics, religious beliefs, criminal record and trade union activities. It can also include any personal information about children under the age of 16.
- **Processing** includes the collection, retention, use, disclosure and destruction of information.

### 5.2 Through the existence of this policy, what can the Company use my Personal Data and Sensitive Personal Data for?

Under the terms of this policy the Company may use an employee's Personal Data and Sensitive Personal Data to:

- Process your Personal Data, including Sensitive Personal Data for the purposes of managing Human Resources and other activities reasonably related to the Company's role as the employer of the employee.
- Disclose Personal Data, including Sensitive Personal Data to certain third parties, such as the Company's insurers, bankers, legal, medical and other professional advisers, the administrators of the Company's pension scheme, your own pension provider or any potential purchaser of the Company.
- Transfer Personal Data, including Sensitive Personal Data, outside the United Kingdom for similar purposes provided any such transfer is in accordance with all relevant data protection laws.

### 5.3 How does the Company justify that it's use of any of my personal data is valid?

The processing of an employee's personal data, including sensitive data, will only be valid if the Company can show that processing is necessary or reasonably required to achieve one or more of the purposes below:

- The conduct or marketing of the Company's business.
- The proper administration and management of the employment relationship and / or its termination, whether processing occurs before, during or after your employment.
- To comply with any legal obligation.

## 6 Glossary of Terms

**Employee** – All persons holding a permanent contract of employment with MWH Treatment or MWH Farrer.