



# Employee Privacy Notice

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## Who we are and how to contact us

Dudley Building Society of 7 Harbour Buildings, The Waterfront, Brierley Hill, West Midlands, DY5 1LN is a data controller of your personal information. This means information that is about you or from which we can identify you. This privacy notice describes how we deal with your personal information. We are the data controller of this information under relevant data protection laws because in the context of our relationship with you we decide how and why it is processed in the ways explained in this privacy notice. When we use terms such as we, us and our in this notice, we mean Dudley Building Society.

We can be contacted at any time including if you have queries about this privacy notice or wish to exercise any of the rights mentioned in it.

You will see at the end of this privacy notice that we mention the privacy notices of Fraud Prevention Agencies and Credit Reference Agencies. We do need to share these with you. Please read them carefully and contact those organisations if you have questions (their details are in their notices).

This privacy notice may be updated from time to time. This means we may send you an updated copy (depending on whether we are required to do so or not depending on the materiality of the changes). The latest version of the privacy notice can be viewed on the Society's website.

## Have you been introduced to us by a recruitment consultant or other third party?

When a Recruitment Consultant processes your personal information on our behalf, this privacy notice will apply and you should contact us to exercise your rights under data protection laws. When a Recruitment Consultant or other third party processes your personal information as a data controller in its own right, its own privacy notice will apply and you should ask them for a copy if you do not have one by the time you are introduced to us.

## Personal information that we generally process in connection with your application or employment

This includes:

- Your title, full name, your contact details, including for instance your email address, home and mobile telephone numbers;
- Your home address, correspondence address (where different from your home address) and address history;
- Your date of birth and/or age;
- Your nationality, if this is necessary for us to comply with our legal and regulatory requirements;
- Records of how you have contacted us and, if you get in touch with us online, details such as your mobile phone location data, IP address and MAC address;
- Personal information which we obtain from Fraud Prevention Agencies (see the section on 'Fraud Prevention Agencies' below); and
- Some special categories of personal data such as about your health.



## **Additional personal information that we process in connection with your application or employment**

- Details about all of your existing borrowings and loans;
- Personal information about your credit history which we obtain from Credit Reference Agencies including data which originates from Royal Mail (UK postal addresses), local authorities (electoral roll), the insolvency service, Companies' House, other lenders and providers of credit (who supply data to the CRAs), court judgments decrees and administration orders made publicly available through statutory public registers (see the section on 'Credit Reference Agencies' below);
- Information which is relevant for your residency and/or citizenship status, such as your nationality, your length of residency in the UK and/or whether you have the permanent right to reside and work in UK;

## **How your information will be used**

As your employer, or potential employer, the Society needs to keep and process information about you for normal employment purposes. The information we hold and process will be used for our management and administrative use only. We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately, during the recruitment process, whilst you are working for us, at the time when your employment ends and after you have left.

## **What is the source of your personal information?**

We will generally collect your personal information from you directly throughout your application / onboarding process. However, some information may come from other internal sources, such as your manager, or in some cases, external sources, such as referees or recruitment consultants.

In addition, we obtain your personal information from other sources such as Fraud Prevention Agencies, Credit Reference Agencies, HMRC, publically available directories and information (eg telephone directory, social media, internet, news articles), other organisations to assist in prevention and detection of crime, police and law enforcement agencies.

Some of the personal information obtained from Credit Reference Agencies will have originated from publicly accessible sources. In particular, Credit Reference Agencies draw on court decisions, bankruptcy registers and the electoral register (also known as the electoral roll). We explain more about Credit Reference Agencies below. We have also mentioned above in the lists of personal information that we process some of the CRAs' other sources of information (which are our own source of information too).

## **What are the legal grounds for our processing of your personal information (including when we share it with others)?**

Data protection laws require us to explain what legal grounds justify our processing of your personal information (this includes sharing it with other organisations). For some processing more than one legal ground may be relevant (except where we rely on a consent). Here are the legal grounds that are relevant to us:

- 1) Processing necessary to perform our contract with you (for your employment) or for taking steps prior to entering into it:
  - a. updating your records; and
  - b. sharing your personal information with other institutions such as when you ask to provide a reference.



## 2) Processing necessary to comply with our legal obligations:

- a. For compliance with laws that apply to us;
- b. For establishment, defence and enforcement of our legal rights or those of any other member of our Group;
- c. For activities relating to the prevention, detection and investigation of crime;
- d. To carry out identity checks, anti-money laundering checks, and checks with Fraud Prevention Agencies throughout the application stage, and periodically after that throughout your employment;
- e. To carry out monitoring and to keep records (see below);
- f. To deal with requests from you to exercise your rights under data protection laws;
- g. To process information about a crime or offence and proceedings related to that (in practice this will be relevant if we know or suspect fraud); and
- h. When we share your personal information with these other people or organisations:
  - Law enforcement agencies and governmental and regulatory bodies such as HMRC, the Financial Conduct Authority and the Prudential Regulation Authority; and
  - Courts and to other organisations where that is necessary for the administration of justice, to protect vital interests and to protect the security or integrity of our business operations.

## 3) Processing with your consent:

- When you request that we share your personal information with someone else and consent to that, we will only disclose information about you to third parties if we are legally obliged to do so or where we need to comply with our contractual duties to you, for instance we may need to pass on certain information to our external payroll / HR system provider, pension or health assurance schemes. We will also pass your details to third parties that provide non contractual benefits to you, for example perk schemes and wellbeing initiatives.

## How and when can you withdraw your consent?

Much of what we do with your personal information is not based on your consent, instead it is based on other legal grounds. For processing that is based on your consent, you have the right to take back that consent for future processing at any time. You can do this by contacting the HR Team, or writing to the address above.

We will tell the recruitment agency who introduced you to us that you have withdrawn your consent only if it is our data processor (this means an organisation who is processing personal information on our behalf) or if we are required to do when you exercise certain rights under data protection laws. You should make sure to contact them directly to withdraw your consent for what they do with your personal information as a data controller in their own right.

## Is your personal information transferred outside the UK or the EEA?

We are based in the UK but sometimes your personal information may be transferred outside the UK or the European Economic Area. If it is processed within Europe or other parts of the European Economic Area (EEA) then it is protected by European data protection standards. Some countries outside the EEA do have adequate protection for personal information under laws that apply to us. We will make sure that suitable safeguards are in place before we transfer your personal information to countries outside the EEA which do not have adequate protection under laws that apply to us.

## How do we share your information with credit reference agencies?

Upon offer of employment, we will perform credit and identity checks on you with one or more credit reference agencies ("CRAs"). We will also perform subsequent checks with CRAs to monitor your on-going fitness and propriety to fulfil your role. To do this, we will supply your personal information to CRAs and they will give us information about you. This will include information about your financial situation and financial history. CRAs will supply to us both public (including the electoral register) and shared credit, financial situation and financial history information and fraud prevention information.



We will use this information to:

- Assess your creditworthiness and assessment of fitness and propriety;
- Verify the accuracy of the data you have provided to us; Prevent criminal activity, fraud and money laundering;

All offers of employment will be made subject to satisfactory checks from CRAs.

The identities of the CRAs, their role as fraud prevention agencies, the data they hold, the ways in which they use and share personal information, data retention periods and your data protection rights with the CRAs are explained in more detail [www.dudleybuildingsociety.co.uk/privacy](http://www.dudleybuildingsociety.co.uk/privacy) or in the separate leaflet to which we refer below.

When CRAs receive a search from us they will **NOT** place a search footprint on your credit file, this will therefore not have any effect to your credit file.

## **How do we share your information with fraud prevention agencies?**

The personal information we have collected from you will be shared with fraud prevention agencies who will use it to prevent fraud and money-laundering and to verify your identity. If fraud is detected, you could be refused certain services, finance or employment. Further details of how your information will be used by us and these fraud prevention agencies, and your data protection rights, can be found by writing to us at 7 Harbour Buildings, The Waterfront, Brierley Hill, West Midlands, DY5 1LN.

## **Do you have to provide your personal information to us?**

We are unable to continue with your application or subsequent employment without having personal information about you. Your personal information is required before you can enter into the relevant contract with us, or it is required during the life of that contract, or it is required by laws that apply to us. If we already hold some of the personal information that we need – for instance if you are already an employee – we may not need to collect it again.

## **What should you do if your personal information changes?**

You should tell us without delay so that we can update our records. If you are an applicant, you will be able to do this through our applicant portal at [www.dudleybuildingsociety.co.uk/careers](http://www.dudleybuildingsociety.co.uk/careers). If you are a current employee, you will be able to amend your details within the employee portal.

## **Do we do any monitoring involving processing of your personal information?**

In this section monitoring means any listening to, recording of, viewing of, intercepting of, or taking and keeping records (as the case may be) of calls, email, text messages, social media messages, in person face to face meetings and other communications.

We may monitor where permitted by law and we will do this where the law requires it. In particular, where we are required by the Financial Conduct Authority's regulatory regime to record certain telephone lines or in person meetings (as relevant) we will do so.

Some of our monitoring may be to comply with regulatory rules, self-regulatory practices or procedures relevant to our business, to prevent or detect crime, in the interests of protecting the security of our communications systems and procedures, to have a record of what we have discussed with you and actions agreed with you, to protect you and to provide security for you (such as in relation to fraud risks on your account) and for quality control and staff training purposes.

Some of our monitoring may check for obscene or profane content in communications.

We may conduct short term carefully controlled monitoring of your activities on your account where this is necessary for our legitimate interests or to comply with our legal obligations. For instance, were we suspect fraud, money laundering or other crimes.

Telephone calls and/or in person meetings between us and you in connection with your application and your account may be recorded to make sure that we have a record of what has been discussed and what your instructions are. We may also record these types of calls for the quality control and staff training purposes.



## For how long is your personal information retained by us?

Unless we explain otherwise to you, we will hold your personal information for the following periods:

- **Retention of applications for employment.** We will retain the personal information that we need to keep for the purposes of job alerts for a period of 12 months. You can extend this period by logging in to our platform and changing your preferences.
- **Retention in accordance with legal and regulatory requirements.** We will retain the personal information that we need to keep even after the relevant contract you have with us has come to an end for 6 years and this will be to satisfy our legal and regulatory requirements.

If you would like further information about our data retention practices, contact us.

## What are your rights under data protection laws?

Here is a list of the rights that all individuals have under data protection laws. They do not apply in all circumstances. If you wish to exercise any of them we will explain at that time if they are engaged or not. The right of data portability is only relevant from May 2018.

- The **right to be informed** about your processing of your personal information;
- The right to have your personal information **corrected if it is inaccurate** and to have **incomplete personal information completed**;
- The right **to object** to processing of your personal information;
- The **right to restrict processing** of your personal information;
- The right **to have your personal information erased** (the "right to be forgotten");
- The right to **request access** to your personal information and to obtain information about how we process it;
- The right to **move, copy or transfer your personal information** ("data portability");
- Rights in relation to **automated decision making which has a legal effect or otherwise significantly affects you**.

You have the right to complain to the Information Commissioner's Office which enforces data protection laws:

<https://ico.org.uk/>

If you wish to exercise any of these rights against the Credit Reference Agencies, the Fraud Prevention Agencies, or third party who is data controller in its own right, you should contact them separately.

## Data anonymisation and use of aggregated information

Your personal information may be converted into statistical or aggregated data which cannot be used to re-identify you. It may then be used to produce statistical research and reports. This aggregated data may be shared and used in all the ways described in this privacy notice.

## Data Privacy Notices from other organisations

We have mentioned that we share your personal information with Fraud Prevention Agencies and Credit Reference Agencies. They require us to pass on to you information about how they will use your personal information to perform their services or functions as data controllers in their own right. These notices are separate to our own. They are in the separate leaflets which can be obtained from our branches or by going to [www.dudleybuildingsociety.co.uk/privacy](http://www.dudleybuildingsociety.co.uk/privacy).

## Who is in our group?

Please refer to [dudleybuildingsociety.co.uk/privacy](http://dudleybuildingsociety.co.uk/privacy) for details of any organisations that are part of our group.