

# Employee Data Protection Policy - ATC Language Schools

ATC Language Schools Employee Data Protection Policy refers to our commitment to treat information of employees with the utmost care and confidentiality. With this policy, we ensure that we gather, store and handle data fairly, transparently and with respect towards individual rights.

## **Scope**

This policy refers to all parties (employees, job candidates) who provide any amount of information to us.

## **Policy elements**

As part of our operations, we need to obtain and process information. This information includes any offline or online data that makes a person identifiable such as names, addresses, photographs, PPS numbers, financial data etc. ATC Language Schools collects this information in a transparent way and only with the full cooperation and knowledge of parties. Once this information is available to us, the following rules apply.

Our data will be:

- Accurate and kept up-to-date
- Collected fairly and for lawful purposes only
- Processed by the company within its legal and moral boundaries

## **Why we hold your personal data**

We are required to hold your personal data for various legal and practical purposes, without which we would be unable to employ you. Holding your personal data enables us to meet various administrative and legal obligations (e.g. for tax purposes). We will also process your personal information in other circumstances, provided you have given your consent for us to do so.

## **Lawful basis for processing personal data**

The lawful basis for processing the personal data of employees as described in this document is to fulfil a contract with an individual. There is a contractual requirement for you to provide much of the information detailed. Without this we will be unable to fulfil our obligations which could result in the contract terminating.

## **Personal data held by ATC Language Schools**

The information we hold about you is primarily information you provided when applying for your job, supplemented by information generated in the course of your employment.

In common with all data subjects:

- Your name;
- Your contact details;

- Unique personal identifiers and biographical information (e.g. date of birth);
- Information related to the prevention and detection of crime and the safety of staff and students.

Also:

- Financial information gathered for the purposes of administering wages;
- If required Visa documentation;
- Details of your education, qualifications and publications.

Particular to staff:

- Your application and curriculum vitae;
- Details of your career;
- References;
- Your contract of employment;
- Performance reviews;
- Disciplinary, grievance and capability procedures;
- Accidents at work; and
- Training provided.

### **Sensitive personal data held by ATC Language Schools**

The information we hold is that which you provide to us (for example, you may give us information by filling in forms on our website, or by corresponding with us by post, telephone, email or otherwise).

Communications to you may be sent by post, telephone or a work email address. Your personal mobile phone number will only be used if you have given consent.

### **Sharing your data with others**

Within ATC Language Schools, personal data, including sensitive personal data, may be shared between members of staff, who legitimately need the information to carry out their normal duties to support your time with us. We endeavour to ensure that sensitive personal data is only shared with colleagues with your explicit consent. However, circumstances may arise where this data is shared with colleagues without gaining your consent. This will only occur if it is necessary to protect your vital interests or the vital interests of another person; or for certain other reasons where it is not possible or appropriate to gain your consent such as disclosures to the Gardaí for prevention or detection of crime.

ATC Language Schools may disclose certain personal data to third parties. These external organisations, and the purpose for sharing the information, are set out below.

- Relevant data, including your bank details, will be shared with our payroll providers and may be shared with our accountants (for payment of expenses).

- Relevant data may be shared with your next of kin but only with your consent or in an emergency.

Otherwise, ATC Language Schools does not share data with any third party, except as allowed for in other privacy notices or required by law. We do not sell your personal data to third parties under any circumstances, or permit third parties to sell on the data we have shared with them.

### **How long data is kept**

We will keep your personal data only as long as is necessary for the purpose(s) for which it was collected, and in accordance with our Data Protection Policy. Data will be securely destroyed when no longer required.

Data retention for unsuccessful applicants:

1 year

Data retention for successful applicants:

7 years after cessation of employment

In the event of creating a panel of suitable candidates for potential roles permission for data to be retained will be sought and a specified retention period will be outlined.

Where you exercise your right to erasure, we will continue to maintain a core set of personal data (name, dates of working at ATC Language Schools and date of birth) to ensure we do not contact you inadvertently in future, and to maintain your record for archive purposes. We may also need to retain some financial records about you for statutory purposes (e.g. accounting matters).