

GDPR Data Protection Privacy Notice (Employment)

This notice explains what personal data (information) we hold about you, how we collect it, and how we use and may share information about you during your employment and after it ends. We are required to notify you of this information under data protection legislation.

Please ensure that you read this notice and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

Who collects the information

JBT Distribution Limited ("**Company**") is a "data controller" and gathers and uses certain information about you.

Data protection principles

We will comply with the data protection principles when gathering and using personal information, as set out in our GDPR Data Protection Policy (Employment).

About the information we collect and hold

The table set out in the Schedule summarises the information we collect and hold, how and why we do so, how we use it and with whom it may be shared.

We may also need to share some of the categories of personal information set out in the Schedule with other parties, such as external contractors and our professional advisers and potential purchasers of some or all of our business or on a restructuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations. We may also be required to share some personal information as required to comply with the law.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

Where information may be held

Information may be held at our offices, and those of our group companies, and third party agencies, service providers, representatives and agents as described above. Information may be transferred to other countries around the world, including countries that do not have data protection laws equivalent to those in the UK, for the reasons described above. We have security measures in place to seek to ensure that there is appropriate security for information we hold.

How long we keep your information

We keep your information during and after your employment for no longer than is necessary for the purposes for which the personal information is processed. Further details on this are available in our Employment Data Retention Policy, which is available on request.

Your rights to correct and access your information and to ask for it to be erased

Please contact the HR Manager who can be contacted via email at hr@jbt.co.uk if (in accordance with applicable law) you would like to correct or request access to information that we hold relating to you or if you have any questions about this notice. You also have the right to ask the HR Manager for some but not all of the information we hold and process to be erased (the "right to be forgotten") in certain circumstances. The HR Manager will provide you with further information about the right to be forgotten, if you ask for it.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

How to complain

If you have any queries or concerns about this notice or about our use of your personal information, please contact the HR Manager.

If HR Manager is not able to address your query or concern, you can contact the Information Commissioner at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

The Schedule

About the information we collect and hold

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Your name, contact details (i.e. address, home and mobile phone numbers, email address) and emergency contacts (i.e. name, relationship and home and mobile phone numbers) <input type="checkbox"/>	From you	To enter into/perform the employment contract Legitimate interest: to maintain employment records and good employment practice	To enter into/perform the employment contract
Details of salary and benefits, bank/building society, National Insurance and tax information, your age <input type="checkbox"/>	From you	To perform the employment contract including payment of Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice	To ensure you receive the correct pay and benefits Information shared with our payroll administrators MAZARS and with HM Revenue & Customs (HMRC)
Details of your spouse/partner and any dependants <input type="checkbox"/>	From you	To perform the employment contract including employment-related benefits, e.g. private medical insurance, life assurance and pension	To ensure you receive the correct pay and benefits Information shared with our payroll administrators MAZARS and with HM Revenue & Customs (HMRC)
Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information <input type="checkbox"/>	From you and, where necessary, the Home Office	To enter into/perform the employment contract To comply with our legal obligations Legitimate interest: to maintain employment records	To carry out right to work checks Information may be shared with the Home Office
A copy of your driving licence <input type="checkbox"/>	From you	To perform the employment contract To comply with our legal obligations To comply with the terms of our insurance	To ensure that you have a clean driving licence Information may be shared with our insurer

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
<p>Details of the vehicle that you drive, including details of the location of the vehicle at all times, and continuous monitoring of the vehicles. Your driving behaviour will also be recorded.</p>	<p>We will install an electronic smart card called a Digital Tachograph;</p> <p>We may arrange with the vehicle's manufacturer to have access to telematics information they obtain on the vehicle.</p> <p>CCTV may be installed in the vehicle where appropriate and where necessary</p>	<p>To comply with our legal obligations</p> <p>To comply with the terms of our insurance</p> <p>To perform the employment contract eg to monitor the transport of goods</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice, to ensure safe working practices and to reduce likelihood of accidents</p>	<p>Information shared with our Operations Team to monitor the vehicle's location for planning; with insurers where necessary; with relevant managers, HR personnel.</p> <p>Information may be shared with DVSA/regulators on request.</p>
<p>Details of your pension arrangements, and all information included in these and necessary to implement and administer them <input type="checkbox"/></p>	<p>From you, from our pension administrators Standard Life and (where necessary) from your own pension fund administrators</p>	<p>To perform the employment contract including employment-related benefits</p> <p>To comply with our legal obligations</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice</p>	<p>To administer your pension benefits and to comply with our auto-enrolment pension obligations</p> <p>Information shared with our pension administrators Standard Life and with HMRC.</p>
<p>Information in your sickness and absence records (including sensitive personal information regarding your physical and/or mental health) <input type="checkbox"/></p>	<p>From you, from your doctors, from medical and occupational health professionals we engage</p>	<p>To perform the employment contract including employment-related benefits</p> <p>To comply with our legal obligations</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and</p>	<p>To maintain employment records, to administer sick pay entitlement, to follow our policies and to facilitate employment-related health and sickness benefits</p> <p>To comply with our legal obligations to you as your</p>

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
		corporate governance obligations and good employment practice, to ensure safe working practices	employer Information shared with your doctors, with medical and occupational health professionals we engage For further information, see * below
Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs	From you	To comply with our legal obligations and for reasons of substantial public interest (equality of opportunity or treatment)	To comply with our equal opportunities monitoring obligations and to follow our policies For further information, see * below
Your trade union membership	From you or your trade union	To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice	For staff administration and to pay trade union premiums and register the status of a protected employee Information shared with your trade union For further information, see * below
Information on grievances raised by or involving you	From you, from other employees and from consultants we may engage in relation to the grievance procedure	To perform the employment contract To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice	For staff administration, to follow our policies and to deal with grievance matters Information shared with relevant managers, HR personnel and with consultants we may engage
Information on conduct issues involving you	From you, from other employees and from consultants we may engage in relation to	To comply with our legal obligations Legitimate interests:	For staff administration and assessments, to follow our policies,

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
	the conduct procedure	to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice, to ensure safe working practices	to monitor staff performance and conduct and to deal with disciplinary and grievance matters Information shared with relevant managers, HR personnel and with consultants we may engage
Details of your appraisals and performance reviews	From you, from other employees and from consultants we may engage in relation to the appraisal/performance review process	To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice, to ensure safe working practices	For staff administration and assessments, to follow our policies, to monitor staff performance and conduct and to deal with disciplinary and grievance matters Information shared with relevant managers, HR personnel and with consultants we may engage
Details of your performance management/improvement plans (if any)	From you, from other employees and from consultants we may engage in relation to the performance review process	To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice, to ensure safe working practices	For staff administration and assessments, to follow our policies and to monitor staff performance Information shared with relevant managers, HR personnel and with consultants we may engage
Details of your time and attendance records	From you	To perform the employment contract Legitimate interest: to monitor and manage staff access to our systems and facilities and to record staff absences	For payroll and staff administration and assessments, to follow our policies and to monitor staff performance and attendance Information shared with relevant managers, HR personnel and with

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
			consultants we may engage
Information in applications you make for other positions within our organisation	From you	<p>To enter into/perform the employment contract</p> <p>To comply with our legal obligations</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice</p>	<p>To process the application</p> <p>Information shared with relevant managers, HR personnel and with consultants we may engage</p>
Information about your use of our IT, communication and other systems	Automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, remote access systems, email and instant messaging systems, intranet and Internet facilities, telephones, voicemail, mobile phone records	<p>Legitimate interests:</p> <p>to monitor and manage staff access to our systems and facilities;</p> <p>to protect our networks, and personal data of employees and customers/clients, against unauthorised access or data leakage;</p> <p>to ensure our business policies, such as those concerning security and internet use, are adhered to for operational reasons, such as maintaining employment records, recording transactions, training and quality control;</p> <p>to ensure that commercially sensitive information is kept confidential;</p> <p>to check that restrictions on your activities that apply</p>	<p>To protect and carry out our legitimate interests (see adjacent column</p> <p>Information shared with relevant managers, HR personnel and with consultants we may</p> <p>For further information, see ** below)</p>

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
		<p>after your employment has ended (post-termination restrictions or restrictive covenants) are being complied with to prevent unauthorised access and modifications to our systems as part of investigations by regulatory bodies, or in connection with legal proceedings or requests</p>	
<p>Details of your use of business-related social media, such as LinkedIn</p>	<p>From relevant websites and applications</p>	<p>Legitimate interests:</p> <ul style="list-style-type: none"> to monitor and manage staff access to our systems and facilities; to protect our networks, and personal data of employees and customers/clients, against unauthorised access or data leakage; to ensure our business policies, such as those concerning security and internet use, are adhered to; for operational reasons, such as maintaining employment records, recording transactions, training and quality control; to ensure that commercially sensitive information is kept confidential; to check that restrictions on your activities that apply 	<p>To protect and carry out our legitimate interests (see adjacent column)</p> <p>Information shared with relevant managers, HR personnel and with consultants we may engage</p> <p>For further information, see ** below</p>

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
		<p>after your employment has ended (post-termination restrictions or restrictive covenants) are being complied with;</p> <p>for security vetting and investigating complaints and allegations of criminal offences;</p> <p>as part of investigations by regulatory bodies, or in connection with legal proceedings or requests</p>	
<p>Your use of public social media (only in very limited circumstances, to check specific risks for specific functions within our organisation; you will be notified separately if this is to occur)</p>	<p>From relevant websites and applications</p>	<p>Legitimate interests:</p> <p>to monitor and manage staff access to our systems and facilities;</p> <p>to protect our networks, and personal data of employees and customers/clients, against unauthorised access or data leakage;</p> <p>to ensure our business policies, such as those concerning security and internet use, are adhered to;</p> <p>for operational reasons, such as maintaining employment records, recording transactions, training and quality control;</p> <p>to ensure that commercially sensitive information</p>	<p>To protect and carry out our legitimate interests (see adjacent column)</p> <p>Information shared with relevant managers, HR personnel and with consultants we may engage</p> <p>For further information, see ** below</p>

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
		<p>is kept confidential</p> <p>to check that restrictions on your activities that apply after your employment has ended (post-termination restrictions or restrictive covenants) are being complied with;</p> <p>for security vetting and investigating complaints and allegations of criminal offences;</p> <p>as part of investigations by regulatory bodies, or in connection with legal proceedings or requests</p>	
<p>Details in references about you that we give to others</p>	<p>From your personnel records, our other employees</p>	<p>To perform the employment contract</p> <p>To comply with our legal obligations</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice</p>	<p>To provide you with the relevant reference</p> <p>To comply with legal/regulatory obligations</p> <p>Information shared with relevant managers, HR personnel and the recipient(s) of the reference</p>

You are required (by law or under the terms of your contract of employment, or in order to enter into your contract of employment) to provide the categories of information marked '☐' above to us to enable us to verify your right to work and suitability for the position, to pay you, to provide you with your contractual benefits, and to administer statutory payments such as statutory sick pay (SSP). If you do not provide this information, we may not be able to employ you, to make these payments or provide these benefits.

* Further details on how we handle sensitive personal information are set out in our GDPR Data Protection Policy (Employment), available from the HR department.

** Further information on the monitoring we undertake in the workplace and how we do this is available in our Internet, Email and Mobile Technology Acceptable Use Policy which is contained in our Employee Handbook and available from the HR department.