

Privacy Notice

Who are Paraplus from a data perspective?

Paraplus is an umbrella company. An umbrella company is a company that acts as an employer to agency contractors who work under a fixed term contract assignment, usually through a recruitment employment agency.

We give temporary workers (often agency workers) the opportunity to sign up to Paraplus and essentially become our employee (under our umbrella if you like) so that even though these agency workers will be temping at other organisations, we manage your payroll and pay you. Once a temporary worker become a Paraplus employee they are then eligible to receive statutory benefits such as paid holidays, sick pay and maternity pay. In order to on-board an agency worker as an employee we need to collect some personal data initially, and on an ongoing basis during the course of a temporary worker's relationship with us – to ensure we are looking after those agency workers as an employee and abiding by all UK employment law.

As there is a signed contract in place between a Paraplus employee and Paraplus, and due to the nature of employment law, we control and process all your data under our obligations to fulfil these contractual obligations and processing that is additionally necessary for us to comply with the law.

Finally, umbrella companies give recruitment agencies the opportunity to outsource the payment and management of payroll of their agency workers to a third party.

This Privacy Notice

This Privacy Notice explains how Paraplus collects/receives data, how we control and process any data we collect/receive, who we collect/receive this data from, why we collect/receive it, and what happens to this data.

Our privacy notice also explains how we manage subject access requests and the right to erasure. This privacy notice details how we comply with our legal obligations under the General Data Protection Act 2018. Your privacy is important to us, and we are committed to protecting and safeguarding data privacy rights.

Who does this policy apply to?

This Privacy Policy applies to temporary workers and/or agency workers who are employed by Paraplus Holdings Limited. This privacy policy does not relate to permanent workers for Paraplus Holdings Limited. To read this privacy policy please access the HR shared service drive.

This Privacy Policy additionally applies to agencies who outsource their payroll of their agency workers to Paraplus.

- For the purpose of applicable data protection legislation (including but not limited to the General Data Protection Regulation (Regulation (EU) 2016/679), the company responsible for your personal data is Paraplus Holdings Limited.

- It is important to point out that we may amend this Privacy Notice from time to time. We will post any changes here, so you can easily take a look at any point to keep up to date.
- If you have a query about any aspect of our Privacy Notice, you can contact our GDPR team and our Data Protection Officer, **Alexandra Nathanson** on GDPR@umbrellapraplus.co.uk

In Brief:

What kind of personal data do we process or collect & how do we use it?

- **INITIAL REGISTRATION**

What we collect and why: In order to on-board you as an employee of Umbrella Paraplus, we need to abide by all UK employment laws that require data for example we must check that you have the right to work in the UK and we must collect contact information to produce a contract of employment.

We need to understand that you are who you say you are, that your details are unique to anyone else you may have registered in the past or in the future so that there can be no mix-up in who is paid what. We also want to provide you with as personal a service as possible that reflects your preferred preferences as to how you are known (this may be in terms of your gender choice, preferred name or title). We also need to be able to contact you should any matters arise.

In addition, we need to ensure we have the information required to ensure you are entitled to, and can receive your pension and any other statutory benefits. This necessitates collecting and passing on required information to third parties such as the Home Office (to ensure your identity and status is in accordance with the employment laws governing who can collect UK statutory benefits), HMRC (to ensure your tax is being handled correctly) or your pension provider (to ensure your pension is managed correctly).

We need to collect details about any assignments you will be working on and your bank account details so that you can be paid correctly.

We do need to sometimes collect sensitive personal data regarding health status or gender recognition. In these cases, we collect this in order to meeting the rights of employment.

Our in-depth data chart on the second page of this privacy policy details exactly what we collect, why and if this is shared, who this is shared with.

- **DURING YOUR WORKING RELATIONSHIP WITH US**

During the course of your employment with us we will need to collect information on the type of work you do and how long you do it for Department of Work & Pensions records or simply to ensure the correct rate of pay is being applied depending on the job that you do and the hours you do it over.

We will need to understand where you have recently worked and who for, in order to ensure we are meeting our obligations under the Agency Worker Regulations which give agency workers the same pay as their equivalent permanent counterparts after 12 weeks.

In order to fulfil our legal obligations, we may need to share your details with third parties like HMRC to ensure your taxation is correct and to ensure adherence with regulations requirements like Offshore Intermediary Legislation Reporting (OIL).

We will need to record any sickness to make decisions on sick pay and we will also need to collect fit notes to determine eligibility to return to work. We will need to record whether you are pregnant so the appropriate maternity pay and maternity steps, such as risk assessment can be taken and a MATB1 form collected.

We may need to collect information or investigate further should there be any issues relating to allegations, disciplinaries, health and safety issues, accidents at work and pass this on to ACAS in certain situations - ACAS (advisory, conciliation and arbitration service) are a public body who help employers and employees work through a grievance situation. We may also need to share data with the Health & Safety Executive, the body that works to prevent accidents at work and takes on an investigative role.

IN-DEPTH: Our in-depth data chart below details exactly what we collect, why and if this is shared, who this is shared with.

What data is collected?	Why?	Do we share this data with anyone? If so with whom / what?
Candidate First Name	Create unique Candidate profile, to fulfil obligations as employer/payroll provider	Pensions Auto-enrolment Pension Provider (PAE Pension Provider), HMRC (the UK tax authority) Importing Employer for TUPE – Employers Liability Information, where a worker or a client hiring organisation no longer wishes to use the services of Paraplus.
Candidate Middle Names	Create unique Candidate profile, to fulfil obligations as employer/payroll provider	PAE Pension Provider, HMRC, Importing Employer (TUPE – Employers Liability Information)
Candidate Surname/Title	Create unique candidate profile, to fulfil obligations as employer/payroll provider	PAE Pension Provider, HMRC, Importing Employer (TUPE – Employers Liability Information)
Candidate Preferred Name	To offer a personal and appropriate service, to fulfil obligations as employer/payroll provider	PAE Pension Provider, HMRC, Importing Employer (TUPE – Employers Liability Information)
Candidate Gender	To fulfil obligations as employer/payroll provider e.g. gender pay reporting	PAE Pension Provider, HMRC, Importing Employer (TUPE – Employers Liability Information)
Gender Recognition Certificate	Create Candidate profile, to fulfil obligations as employer/payroll provider. Allows Transsexual candidate to have their acquired gender to be legally recognised in the UK.	HMRC, Importing Employer (TUPE – Employers Liability Information)
Date of Birth/Age	To fulfil obligations as employer/payroll provider	PAE Pension Provider, HMRC, Importing Employer (TUPE – Employers Liability Information)
NI Number	Create unique Candidate profile, to fulfil obligations as employer/payroll provider	PAE Pension Provider, HMRC, Importing Employer (TUPE – Employers Liability Information)

What data is collected?	Why?	Do we share this data with anyone? If so with whom / what?
Passport Number	Create unique Candidate profile, to fulfil obligations as employer/payroll provider in relation to Right to Work laws	Home Office (the UK Government body responsible for ensuring legal status in the UK), HMRC
Passport Issuing Country	To allow collection of Statistical Information and to delivery our service in the most appropriate language	Home Office, HMRC
Current Address & Postcode	Create Unique Candidate profile, to fulfil obligations as employer/payroll provider for example Oil Reporting	PAE Pension Provider, HMRC, Importing Employer (TUPE – Employers Liability Information)
Email Address	To ensure you can be contacted under our contractual obligations to make you aware of any changes - for example regarding pension regulations	PAE Pension Provider, Importing Employer (TUPE – Employers Liability Information)
Mobile Number	To ensure you can be contacted under our contractual obligations to make you aware of any changes - for example regarding pension regulations	PAE Pension Provider, Importing Employer (TUPE – Employers Liability Information)
Home telephone Number	To ensure you can be contacted under our contractual obligations to make you aware of any changes - for example regarding pension regulations	PAE Pension Provider, Importing Employer (TUPE – Employers Liability Information)
Job title	To allow collection of Statistical Information	Department of Work & Pensions (DWP), ACAS, Importing Employer (TUPE – Employers Liability Information)
Industry Sector	To allow collection of Statistical Information	DWP, ACAS,
How you heard about us	To allow collection of Statistical Information for marketing purposes	Internal with our marketing team

What data is collected?	Why?	Do we share this data with anyone? If so with whom / what?
Business Unit/Place of Work	To identify end the hiring organisation you work for, in order to ensure payroll and any payroll reporting and contractual obligations are met. In addition, in case of a dispute	HMRC, DWP, ACAS (A public body called the Advisory, Conciliation and Arbitration Service which helps employers and employees resolve disputes) Importing Employer (TUPE – Employers Liability Information)
Agency Current	To identify your recruitment Agency for any liaison required during your employment with us and Invoicing. In addition, in case of a dispute	HMRC, DWP, ACAS, Importing Employer (TUPE – Employers Liability Information)
Agencies Previous	To be able to identify which other Agencies a temporary worker has worked for which is necessary to meet UK legal obligations such as AWR/ELI/TUPE. In addition to being able to respond to any invoicing queries and in case of a dispute	HMRC, DWP, ACAS, Importing Employer (TUPE – Employers Liability Information)
Employment Contract	Confirmation of employment agreement Ts & Cs between candidate and Paraplus. In case of a dispute.	Agency (your recruitment agency you are working through), DWP, ACAS, HMRC, Importing Employer (TUPE – Employers Liability Information)
Right to Work Documents	To meet Home Office Obligations	Home Office, Agency, Importing Employer (TUPE – Employers Liability Information)
Passport, VISA, Birth Cert	To confirm your identity and meet Right to Work legal obligations	Home Office, Importing Employer (TUPE – Employers Liability Information)
Bank Account Number	so we can pay wages via BACS to your bank account	Agency
Bank Account Holder Name	so we can pay wages via BACS to candidates and to help us meet our obligations under the Modern-Day Slavery Act	Agency

What data is collected?	Why?	Do we share this data with anyone? If so with whom / what?
Sort Code, Account Number,	so we can pay wages via BACS to your bank account	Agency
Building Society Roll Number	so we can pay wages via BACS to your bank account	Agency
P45/Starter Check List (Code)	To ensure we apply correct Tax Code	HMRC, Importing Employer (TUPE – Employers Liability Information)
Employment Start Date	To record/measure length of service. In case of a dispute	HMRC, DWP, ACAS, Agency, Importing Employer (TUPE – Employers Liability Information)
Payment Method/frequency	Payroll. In case of a dispute	HMRC, DWP, ACAS, Agency, Importing Employer (TUPE – Employers Liability Information)
Tax Code	To record Tax Code for PAYE	HMRC, Importing Employer (TUPE – Employers Liability Information)
Assignment details/Booking	Supports Contract of employment confirms job role	DWP, ACAS, Importing Employer (TUPE – Employers Liability Information)
Hours worked	So hours worked are communicated and paid accordingly - and to help us meet obligations under the Swedish Derogation act - which pays a worker between assignment. In addition, in case of a dispute	HMRC, DWP, ACAS, Importing Employer (TUPE – Employers Liability Information)
Payrate	so correct rate of pay is paid and recorded and pension contributions are made correctly/Invoicing. In addition, in case of a dispute	HMRC, DWP, ACAS, Importing Employer (TUPE – Employers Liability Information)
Payslips	To provide statutory pay information to candidates. In addition, in case of a claim or dispute.	Candidate, HMRC, DWP, ACAS, Solicitors, Housing Associations/Council for Council Tax/Housing Benefit. Mortgage Provider.
Fit Notes	To support claim/payment of Statutory Sick Pay	Agency, The Health & Safety Executive (HSE) (RIDDOR) Client, DWP, HMRC,

What data is collected?	Why?	Do we share this data with anyone? If so with whom / what?
MAT B1	To support claim/payment of Statutory Maternity Pay	Agency, Client, DWP, HMRC
Allegations	To be able to carry out investigations under disciplinary/grievance policy. To meet obligations under Employment Contract Employment Rights/Law	Agency, client, de Poel, ACAS, Solicitor, Trade Union Representative
Investigation, disciplinary, grievance notes and letters	to effectively carry out investigations, disciplinaries/grievances. To meet obligations under Employment Contract Employment Rights/Law	Agency, client, de Poel, ACAS, Solicitor, Trade Union Representative
Attachment of Earnings	Legal Requirement to make deductions from pay	HMRC, Solicitor (with signed authority from candidate) Importing Employer (TUPE – Employers Liability Information)
Accident at Work Report	Investigate Accidents at work, respond to any Solicitor enquiries. Ensure compliance and obligations & standards are met with regards Health and Safety laws and RIDDOR obligations (the reporting of accidents)	Client, Agency, Health & Safety Executive, Solicitor (with signed authority from candidate)

Who else has access to your data?

As well as the organisations listed in the data table above, Paraplus uses a number of processors, these include:

*SMT: The development company responsible for the Paraplus App and CRM system (the system where all Paraplus candidate records are stored and where certain documents can be accessed through a mobile phone app

*Able & Robot: Two financial/payroll processing systems which ensure you are paid the correct amount, on time.

*e-tips®: A software system which client hiring organisations transact through to book temporary workers. Client hiring organisations using e-tips® are the only organisations that are able to use the services of Paraplus and as a worker for them, you will also appear on the e-tips® system.

*Web Analytics Services: Unless you specify otherwise, if you visit our site we may share your information with providers of web analytics services

How do we safeguard your personal data?

- We care about protecting your information. That's why we put in place appropriate measures that are designed to prevent unauthorised access to, and misuse of, your personal data. Please refer additionally to the Paraplus data protection policy.

How long do we keep your personal data for?

As a data controller we adhere to the following retention periods, and at the end of the retention period the electronic pack or paper record falling into the appropriate date range is marked for destruction on relevant date. Upon destruction date electronic file is deleted, paper record is shredded.

Item	Details (including but not exhaustive)	Method of collection/retention	Legal requirement (or recommendation) for retention and destruction	Source
Candidate Registration Pack	CVs, application forms, right to work documentation, referee names and contact details, Marriage certificates, change of name deeds, Civil Partnership Certificate, National Insurance Number, Date of Birth, Address, Bank details, Mobile and home contact numbers, email address, mode of transport, place of work, job title, rate of pay. Shift type. Utility bills, DWP/JCP correspondence	Collected by Recruitment Agency. Received by email at Paraplus direct from Recruitment Agency or candidate. Stored by Paraplus electronically	To be kept for at least a year from their creation and at least 6 years from when services were last used.	Conduct of Employment Agencies and Employment Businesses Regulations 2003 Recommended based on statute of limitations on civil claims
Wage/Salary records	Overtime, bonus, expenses, statutory payments or deductions including Workplace Pension and attachment of earnings information Timesheets P45, P60, P11	Electronic through payroll via etips, Able, Robot Paper* files held off site in storage facility Chaffinch	6 years	Taxes Management Act 1970

Item	Details (including but not exhaustive)	Method of collection/retention	Legal requirement (or recommendation) for retention and destruction	Source
National Minimum Wage records	Individual pay records Timesheets Checking records	Electronic through payroll via etips, Able, Robot Paper* files held off site in storage facility Chaffinch	Must be kept for 3 years from the end of the tax year in which they apply.	National Minimum Wage Act 1998
Records relating to Working Time	Individual record of hours worked timesheets	Electronic through Paraplus Portal, CRM and payroll via etips, Able, Robot Paper* files held off site in storage facility Chaffinch	6 years	The Working Time Regulations 1998 (SI 1998/1833) Taxes Management Act 1970
Records relating to Notice served to terminate Employment Contract	Individual record of notice served and reason	Electronic copies of correspondence stored in Paraplus shared drive.	2 years after employment ceases	Conduct of Employment Agencies and Employment Businesses Regulations 2003 Recommended based on statute of limitations on civil claims

Item	Details (including but not exhaustive)	Method of collection/retention	Legal requirement (or recommendation) for retention and destruction	Source
Employee details - Performance and Development data	Disciplinary, performance improvement, capability, promotion interviews Grievance records ACAS enquiries and correspondence Solicitor correspondence Third Party Reference requests	Electronic through Paraplus CRM, email, server shared drive.	6 years after employment ceases	Recommended based on statute of limitations on civil claims
Training records	Record of courses and other training completed, exam results, certificates	Electronic through Paraplus CRM, email, server shared drive.	6 years after employment ceases	Recommended based on statute of limitations on civil claims
Sickness records	Doctors fit notes, occupational health reports, specialist reports, return to work forms, hospital/consultant correspondence/reports Death Certificate	Electronic through Paraplus CRM, email, server shared drive.	6 years after employment ceases	Recommended based on statute of limitations on civil claims
Medical records (dependent on relevant act)	Occupational health reports, specialist reports, GP reports Death certificates	Electronic through Paraplus CRM, email, server shared drive.	40 years from date of issue	COSHH Control of Lead at Work Control of Asbestos at Work

Item	Details (including but not exhaustive)	Method of collection/retention	Legal requirement (or recommendation) for retention and destruction	Source
Accident Book and reports. RIDDOR reports	Record of work based accidents or incidents Police Report Death Certificate Witness Statements Solicitor letters	Electronic through Paraplus CRM, email, server shared drive.	3 years from entry date	(RIDDOR) (SI 1995/3163)
Statutory Maternity Pay records	MATB1 and other forms, planned leave and expected dates, appointment details, pregnancy related sickness records, pay entitlements	Provision of medical practitioner/hospital forms, face to face, electronic through Paraplus CRM, email, server shared drive.	3 years from end of tax year in which pay was received	The Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960)
Statutory Sick Pay records	Name, pay rate, sick pay entitlement, amount of time off, nature of absence GP letter, hospital/consultant correspondence	Electronic through Paraplus CRM, email, server shared drive.	At least 3 months after sickness but 6 years recommended	CIPD

How can you access, amend or take back the personal data that you have given to us?

Even if we already hold your personal data, you still have various rights in relation to it and you can contact GDPR@umbrellaparaplus.co.uk in order to exercise these rights. We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of any applicable laws. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

- Subject Access Request: If you are interested to find out what data we hold on you and/or wish to request that we modify, update or delete this information, please contact the team at GDPR@umbrellaparaplus.co.uk at any point and we will be happy to advise.
- Please note that in order to comply with your request, we may ask you to verify your identity, or ask for more information about your request and we may decline your request, where we are legally permitted to do so, but we will explain why if we do so.
- Right to object: If we are using your data because we deem it necessary for our legitimate interests to do so, and you do not agree, you have the right to object. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases). Generally, we will only disagree with you if certain limited conditions apply.
- Right to withdraw consent: Where we have obtained your consent to process your personal data for certain activities you may withdraw your consent at any time.
- Right to erasure: In certain situations, you have the right to request us to "erase" your personal data. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases) and will only disagree with you if certain conditions apply (these will typically be around competing legislation for example health and safety or HMRC requirements). If we do agree to your request, we will delete your data but will generally assume that you would prefer us to keep a note of your name on our register of individuals who would prefer not to be contacted. That way, we will minimise the chances of you being contacted in the future where your data are collected in unconnected circumstances. If you would prefer us not to do this, you are free to say so.
- Right of data portability: If you wish, you have the right to transfer your data from us to another data controller. We will help with this – either by directly transferring your data for you, or by providing you with a copy in a commonly used machine-readable format.
- Right to lodge a complaint with a supervisory authority: You also have the right to lodge a complaint with your local supervisory authority. This is:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone: 0303 123 1113 or 01625 545745