

THE ROYAL GARDEN HOTEL

POLICY AND PROCEDURE



SUBJECT:	EMPLOYEE PRIVACY NOTICE
ISSUED BY:	People & Culture
REVIEW DATE:	June 2028

PURPOSE AND SCOPE

The Royal Garden Hotel collects and processes data relating to its employees, workers and contractors in order to manage its relationship with them. We are committed to being transparent about how we collect and use that data and to meet our data protection obligations.

The Royal Garden Hotel is the controller for the personal information we process, unless otherwise stated. This means that we are responsible for deciding how we hold and use personal information about you.

We keep our privacy notice under regular review to make sure it is up to date and accurate. This notice applies to current and former employees, and candidates for new positions.

It is important that you read this notice, together with any other privacy notice that is provided on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

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1.0 What information do we collect and how?

- 1.1 We collect and process a range of information about you. This includes:
- a. Your name, title, address and contact details, including email address,

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- telephone number, date of birth and gender;
- b. The terms and conditions of employment;
- c. Details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with us and reasons for leaving us;
- d. Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process and referral source (e.g. agency, TM referral)
- e. Information about your remuneration, including entitlements to benefits, such as pensions and insurance cover;
- f. Details of your bank account and national insurance number;
- g. Information about your marital status, next of kin, dependants and emergency contacts;
- h. Information about your nationality and entitlement to work in the UK;
- i. Copy of driving license;
- j. Details of your schedule (days of work and working hours) and attendance at work;
- k. Details of periods of leave taken by you, including holidays, sickness absence, attendance family leave and other special leave and the reasons for the leave;
- l. Full employment records for employment (including contract, terms and conditions, job titles, start date, leaving date, work history, working hours, promotion, compensation history, training records and professional memberships).
- m. Photographs or videos;
- n. CCTV footage and other information obtained through electronic means such as swipe card records and IP addresses;
- o. Accident book, first aid records, injury at work and third-party accident information;
- p. Details of residence in the Team Member Accommodation;
- q. Details of any disciplinary or grievance procedures in which you have been involved, including warnings issued to you and related correspondence;
- r. Details of performance information including probation, appraisals and awards;
- s. Secondary employment and volunteering information
- t. Information about medical or health conditions, including whether or not you have a disability for which we need to make reasonable adjustments.
- u. Where they are relevant to our legal obligations, or where you provide them to us, we may process information such as gender, age, date of birth, marital status, nationality, education/work history, academic/professional qualifications, employment details, hobbies, family composition, and dependants.

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- v. Non-financial identifiers such as passport numbers, driving licence numbers, vehicle registration numbers, taxpayer identification numbers, staff identification numbers and tax reference codes.
- w. Financial information such as National Insurance number, pay and payroll records, tax code, tax, pension and benefits contributions, service charge and gratuity/tips payments, expenses claimed.
- x. Other operational personal data created, obtained, or otherwise processed in the course of carrying out our activities, including but not limited to, CCTV footage, recordings of telephone conversations, IP addresses and website visit histories, logs of visitors, and logs of accidents, injuries and insurance claims.
- y. Other employee data (not covered above) including; level, performance management information, languages and proficiency; licences/certificates, immigration status; employment status; and personal biographies.
- z. Information about your use of our information and communications systems.

We will also collect, store and use the following special category and criminal offence data:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
 - Trade union membership.
 - Information about your health, including any medical condition, health and sickness records.
 - Genetic information and biometric data.
 - Information about criminal convictions/allegations and offences
- 1.2 We typically collect personal information about employees, workers or contractors through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. Also from your employers or education provider if you are a secondee or on placement or work experience.
- 1.3 We will sometimes collect additional information from third parties including former employers, or background check agencies, including Disclosure Barring Service (DBS), Employee Doctors, Medical and Occupational Health Professionals, providers of team benefits, HMRC, pension administrators and other government departments.
- 1.4 We will collect additional personal information during job-related activities, for example – your performance throughout the period of you working with us.
- 1.5 Data will be stored in a range of different places, including in your electronic personnel file, in our HR Management system and in other IT systems (including our email system).

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- 2.0 Why do we process personal data?**
- 2.1 We need all the categories of information in the list above ("The kind of information we hold about you") to enable us to perform our role as employer and to enable us to comply with legal obligations.
- 2.2 The situations in which we will process your personal information are listed below.
- Making a decision about your recruitment or appointment.
 - Determining the terms on which you work for us.
 - Checking you are legally entitled to work in the UK and to provide you with the security clearance appropriate for your role.
 - To authenticate employee's identity;
 - Paying you and, if you are an employee, deducting tax and National Insurance contributions.
 - Details of your time spent working and any overtime, expenses or other payments claimed, including details of any loans such as for travel season tickets
 - Details of any leave including sick leave, holidays, special leave etc.
 - Liaising with your pension provider, providing information about changes to your employment such as promotions, changing in working hours.
 - General administration of the contract we have entered into with you.
 - Business management and planning, including accounting, auditing and TMA occupancy/car park.
 - Conducting performance reviews, managing performance and determining performance requirements. To plan career development, for succession planning and workforce management purposes.
 - Making decisions about salary reviews and compensation.
 - Assessing qualifications for a particular job or task, including decisions about promotions.
 - Gathering evidence and any other steps relating to possible grievance or disciplinary matters and associated hearings.
 - Making decisions about your continued employment or engagement.
 - Making arrangements for the termination of our working relationship.
 - Recording education, training and development requirements.
 - Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work.
 - Determining your fitness to work, managing sickness absence.
 - Complying with health and safety obligations.
 - To prevent fraud.
 - Operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared leave) to allow effective workforce management to ensure we comply with duties in line with leave entitlements, and to ensure employees are receiving the pay and other benefits to which they are entitled.
 - To provide references on behalf of current and former employees.

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- Maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency), and records of employee's contractual and statutory rights;
 - To monitor your business and personal use of our information and communication systems and to ensure compliance with our IT policies.
 - To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
 - To conduct data analytics studies to review and better understand employee retention and attrition rates.
 - Equal opportunities monitoring.
 - To issue licences and manage residents in the Team Member Accommodation or Car Park.
 - To process service charge/gratuity/tips through the Troncmaster.
- 2.3 Some of the purposes will overlap and there can be several grounds which justify our use of your personal information which can include adherence to our policies and processes, performance management and assessing wellbeing.
- 2.4 In other cases, we have a legitimate interest in processing personal data before, during and after the end of the employment relationship.
- 2.5 We may also share your personal data with senior leaders in the organisation, as needed, consistent with the situations listed above.
- 2.6 Some special categories of personal data i.e. sensitive personal data, such as information about health or medical conditions, are processed by us where we have a legitimate interest to do so and to carry out employment obligations (such as those in relation to employees with disabilities) and to ensure the health and safety of all team members.
- 2.7 We also collect information relating to your sickness records to maintain a record of your sickness absence and copies of any doctor's notes or other documents supplied to us in connection with your health, to inform your colleagues and others that you are absent through sickness as reasonably necessary to manage your absence, to deal with unacceptably high and suspicious sickness absence and to inform reviewers for probation/appraisal purposes of your sickness absence levels.
- 2.8 Where we process special categories of personal data, such as information about ethnic origin, sexual orientation or religion or belief, this is done for the purposes of carrying out our legal obligations and exercising specific legal rights in relation to employment.
- 2.9 Our obligations as an employer; - How we will use your sensitive personal information:
- We will use information relating to leave of absence; this can include sickness absence or family related leave, to comply with employment and other laws.

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- We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.
- We will use trade union membership information to pay trade union premiums, register the status of a protected employee and to comply with employment law obligations.

3.0 Who has access to data?

- 3.1 Your information may be shared internally, including with members of the People and Culture team, Payroll, your Line Manager, managers in the hotel and IT team members if access to the data is necessary for the performance of their roles.
- 3.2 We share data with third parties in order to:
- a. Obtain advice from professional advisers, including auditors, lawyers, insurers, bankers, occupational health, immigration and others;
 - b. Help third party service providers who provide products and services such as payroll, HR systems, time & attendance, pension schemes, immigration, e-learning, tronc master and benefits administration, People and Culture, performance management, training, expense management, IT, etc; and
 - c. Facilitate the detection of crime or collection of taxes or duties.
- 3.3 We also share your data with third parties that process data on our behalf in connection to payroll and provision of benefits.
- 3.4 We may also disclose your data to third parties:
- a. When we determine that disclosure is required for our rights, property or personal safety, or to respond to requests by public, regulatory or law enforcement authorities, including to meet national security or law enforcement requirements; or
 - b. If we sell some or all of our business assets, we may disclose your personal data to the prospective seller or buyer of such business or assets, and if that transaction closes, then your personal data may be transferred to the buyer.
- 3.5 Third-Party Services and Sub-processors: We work with third-party service providers (such as IT platforms, payroll administrators, and benefits providers) to manage our operations and employment relationship. In delivering these services, our suppliers may utilize their own third-party subcontractors or "sub-processors. While we require our primary suppliers to implement robust data protection and confidentiality standards, any data processed by these subcontractors will be subject to the subcontractor's own privacy policies and

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terms. We encourage you to review the privacy statements of our primary vendors, list of suppliers are in our Appendix.

4.0 Do we need your consent?

- 4.1 We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations, or for one of the other reasons outlined above: 'How we use particularly personal information'.
- 4.2 In limited circumstances, if the need arises, we will approach you for your written consent to allow us to process certain particularly sensitive data.
- 4.3 We do not currently share your personal data with third parties other than our service providers who act on our behalf. However, if we decide to do so in the future, we will offer you the opportunity to choose (opt-out) before your personal data is disclosed to a third-party controller (i.e. non-service provider).
- 4.4 Also, if we decide to use your data for purposes that are different from the purpose(s) for which it was originally collected or subsequently authorised by you, we will offer you the opportunity to choose to opt-out before such use.

5.0 Transfers outside of UK and European Economic Area

- 5.1 Data which we collect from you may be stored and processed in and transferred to countries outside of the UK and European Economic Area (EEA). For example, this could occur if one of our service providers is situated in a country outside of UK or EEA or in Singapore (Group company base).
- 5.2 We will only transfer your personal data outside the UK or the European Economic Area (EEA) where we are satisfied that the transfer complies with applicable data protection law and that appropriate safeguards are in place to protect your personal data. Where required, these safeguards may include a data transfer agreement incorporating the UK International Data Transfer Agreement (IDTA), the UK Addendum to the European Commission's Standard Contractual Clauses, or other legally recognised transfer mechanism.
- 5.3 To ensure that your personal data receives an adequate level of protection, we have put in place appropriate safeguards and procedures with the third parties we share personal data with. This ensures your personal data is treated by those third parties in a way that is consistent with the data protection laws.

6.0 How do we protect data?

- 6.1 We take the protection of data seriously. We have internal policies and controls in place to try and ensure that your data is not lost, accidentally destroyed, misused or disclosed and is not accessed except by our team members in the performance of their duties.
- 6.2 Where we engage third parties to process personal data on our behalf, we do so on the basis of written instructions, and such third parties are under a duty of confidentiality and are obliged to implement appropriate technical and

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organisational measures to ensure the security of data.

7.0 For how long do we keep data?

- 7.1 We will hold your data for the duration of your employment. The periods for which your data will be held after the end of employment are set out in our Data Retention Policy available from People and Culture Department, the Data Protection Officer or other persons responsible for data protection compliance.

8.0 Your rights

- 8.1 As a data subject, you have a number of rights. You can:
- a. Access and obtain a copy of your personal data on request;
 - b. Require us to change incorrect or incomplete personal data;
 - c. Require us to delete or stop processing your data in certain circumstances such as where the data is no longer necessary for the purposes of processing;
 - d. Object to the processing of your data where we are relying on our legitimate interests as the legal grounds for processing, in certain circumstances; and
 - e. Ask us to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override our legitimate grounds for processing data.
- 8.2 If you would like to exercise any of these rights, please contact your line manager or a member of People and Culture.
- 8.3 Please note your duty to inform us of changes: It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

9.0 Complaint resolution

- 9.1 The Introduction of the Data Use and Access Act 2025 has created a new, mandatory statutory complaints-handling framework for employers which took effect on June 19th, 2026.
- 9.2 This gives individuals the right to complain directly to the hotel and requires that it acknowledges complaints within 30 days and respond without undue delay.
- 9.3 Should you have any concerns about how your information is managed at the hotel please contact us at: dpo@royalgardenhotel.co.uk and we will respond to your inquiry promptly. The hotel has a specific Data Protection Complaints Policy which can be provided upon request.
- 9.4 If you are still unhappy following a review by the DPO, you have a right to lodge a complaint to the ICO - <https://ico.org.uk/>

If you are happy for your data to be used for the purposes described in this privacy notice, then you do not need to do anything. If you have any concerns about how your data is shared, then please contact the Data Protection

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Officer.
If you would like to know more about your rights in respect of the personal data we hold about you, please contact the Data Protection Officer as above.

10.0 What if you do not provide personal data?

- 10.1 You are required under your employment contract to provide us with certain personal information. For example, you must report absences from work and may be required to provide information relating to disciplinary or other employment-related matters in accordance with your contractual obligations, including the duty of good faith. You may also need to provide personal data to enable us to comply with our legal obligations or to allow you to exercise your statutory rights, for example in relation to statutory leave or pay. If you do not provide this information, you may be unable to exercise those rights or we may be unable to comply with our legal obligations.
- 10.2 Certain information, including your contact details, evidence of your right to work in the UK and your bank or payment details, is required to enable us to enter into and perform your contract of employment and to meet our legal obligations. If you do not provide other information that we reasonably require, it may affect our ability to administer the employment relationship effectively and to fulfil our contractual and legal responsibilities.

11.0 Changes to this privacy notice

- 11.1 We reserve the right to change this notice policy at any time as we may deem necessary from time to time or as may be required by law. We will provide you with a new privacy notice when we make substantial changes. We may also notify you in other ways from time to time about the processing of your personal data.

12.0 Any applicable law

We are committed to protecting your privacy and will only use information collected lawfully in accordance with:

- Data Protection Act 2018
- The UK General Data Protection Regulations 2016
- Human Rights Act 1998
- Common Law Duty of Confidentiality

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Appendix 1: List of Third-Party providers/companies

Third-Party Providers and Sub-Processors:

We share your personal data with trusted third-party service providers who support our business operations, including payroll, pension administration, benefits administration, IT services, security vetting, and HR systems. These providers may engage approved sub-processors to deliver services on their behalf where necessary.

We ensure that all third-party service providers, including any approved sub-processors, are contractually required to protect your personal data, maintain its confidentiality, implement appropriate security measures, and comply with applicable data protection laws.

For the purposes of this notice, "third parties" include external service providers, contractors, and designated agents who process personal information on our behalf for the purposes described above.

- Pension providers – People Pension, Scottish Widows
- Benefits broker - Chase
- Private Medical Insurance, Medicash, Private health care
- Group Life Insurance
- Group Income Assurance
- Disclosure Barring Service - DDC
- National Security Vetting Service
- Her Majesty's Revenue and Customs - HMRC
- Employee's doctors with employee consent
- Employee Assistance Programme for referrals
- Medical and occupational health professional
- External training providers
- Government apprenticeship and training providers
- Hospitality Bodies for competitions and award entries
- Professional memberships – CIPD, ACCA, etc
- PC Monitoring
- DVLA
- Company mobile phone access
- Software to maintain and process records of time and attendance, absence, payroll
- Software for e-learning, communication and/or appraisals
- Work permits – Home Office
- CCTV
- Home Office – immigration checks
- Software for passport validity – TrustID
- Troncmaster - Grateful
- Immigration solicitors
- DocuSign

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