

This Privacy Notice is effective from 1 September 2025 and is applicable to all companies under Aspris Children's Services Limited ('Aspris').

We will update this Privacy Notice from time-to-time. When we do change the notice (in a significant way), we will post an update on our website.

Aspris takes data protection and confidentiality very seriously. This Privacy Notice covers the following:

1. What is a Privacy Notice?
2. What personal information we collect and store about you
3. How we collect your personal information
4. Purpose(s) of use of your personal information
5. How long we will use your personal information
6. How we store your personal information
7. Protection of your personal information
8. How we may share your personal information with third parties
9. What type of third-party service providers processes your information
10. Accuracy of personal information
11. Automated decisions
12. Access to personal information
13. Your rights

### **Privacy questions**

If you have any questions or concerns about this Privacy Notice or how we process your information, or if you would like to make a complaint about a possible data breach, please contact us at:

Email: [dataprotection@aspris.com](mailto:dataprotection@aspris.com)

### **Postal address:**

Data Protection Officer  
Aspris Children's Services Ltd.  
The Foundry Annex  
65 Glasshill Street  
London, SE1 0QR

We take data security extremely seriously and all such communications are examined and replies issued where appropriate as soon as possible. If you are unsatisfied with the reply you receive, you may refer your complaint to the Information Commissioner's Office ([ico.org.uk](https://ico.org.uk))

## **1. What is a Privacy Notice?**

Aspris is a 'data controller'. This means that we are responsible for determining how we hold and use your personal information. We are required under the data protection legislation to notify you regarding how we hold and use your personal information, and this is done by way of this Privacy Notice.

Our Privacy Notice is applicable to individuals using our services, which includes all young people (students and residents) under our care, as well as other individuals such as colleagues, Local Authorities (LA), job applicants who have submitted information during the application process with Aspris or any other individual who directly or indirectly uses our services. We reserve the right to update this notice at any time and if we do so, you will be provided with an updated version of this notice, which will be accessible on our website as soon as reasonably practicable. It is essential that you review (and retain if you feel necessary) this notice, along with any additional privacy notice we may issue on specific occasions when we are collecting or processing your personal information. This will ensure that you are informed about how and why we use your information and what your rights are under data protection legislation.

## **2. What personal information we collect and store about you**

We may collect, store and use the following categories of personal information about you:

- Personal contact details such as name, title, address, telephone numbers, personal email addresses and contact preferences
- Date of birth
- Marital status and dependents
- Next of kin and emergency contact details
- National insurance number and NHS number
- Bank or credit card details or other payment information (for salary purposes only)
- Identification information contained within your passport and/or driving license or proof of address
- Online identifiers or social media identifiers
- Information about your status, nationality and residency

Please be advised that the collection of your information is not limited solely to the ones mentioned above and Aspris may collect and use your information for other necessary purposes. However, you will always be apprised of the purposes for which such information will be

processed. If you have any queries regarding the usage or processing of your information, we encourage you to refer to our Privacy Notice specifically designed for Residents, Young People, and Students, or for Colleagues. Should you require further clarification on the nature, purpose, collection, or use of your information and are unable to find the information you seek, please contact us directly at [dataprotection@aspris.com](mailto:dataprotection@aspris.com).

**Special Category sensitive data** - Aspris may, based on lawful purposes, need to collect, use, retain special categories of sensitive personal information. Should any sensitive personal information pertaining to you be collected by Aspris, you will be duly informed. For more comprehensive details regarding the collection of special categories of sensitive information related to residents, young people, students, or colleagues, please refer to our designated privacy notices that specifically address these matters.

- Residents, YP and students in our care
- Colleagues and Candidates

**Profiling** – Profiling refers to analysis of aspects of an individual’s personality, behaviour, interests and habits to make predictions or decisions about them.

Aspris may need to profile information relating to the young people that it provides its services to. We are aware that Article 9 of the UK GDPR prohibits processing of sensitive personal information, however, the UK GDPR also provides exceptions under which data can be processed. Aspris will process sensitive personal data under Article 9(d) which allows processing if the processing is carried out in the course of its legitimate activities with appropriate safeguards by an organisation.

### **3. How we collect your personal information**

We may collect personal information directly provided by you or by the Local Authorities (LA) during placement or recruitment. The information is collected, stored, used and maintained (archived as required) during your association with us and our services. We may also collect your personal information from third parties such as the LAs and commissioning authorities, NHS, through your social worker, or other competent authorities, when you apply for any jobs through or portals or other third-party services.

### **4. Purpose(s) of use of your personal information**

In most cases, Aspris will use your personal information to deliver our services, which encompass social care, education, and employment services. However, in exceptional circumstances, we may need to use your personal information to safeguard your interests, or the interests of another individual, or if it serves in the public interest for us to do so.

Aspris and its affiliates may share this personal information with each other but will always use it in accordance with this Privacy Notice. We may also combine it with other information to provide and improve our services.

We will only use your personal information when we are lawfully required to do so. Your personal information will be used under the following circumstances:

- Where you have provided us with your consent,
- Where processing is necessary for the performance of a contract where the data subject is a part of the contract,
- Where we need to comply with a legal obligation
- To protect the vital interest of the data subjects,
- Where it is necessary for legitimate interests pursued by us or a third party and your interests and fundamental rights do not override those interests

We may also use your personal information in the following circumstances (which are expected to be infrequent):

- Where we need to protect your interests (or someone else's interests)
- Where processing of information needs to be carried out in the public interest or for official purposes

Some of the afore-mentioned grounds for processing your information may overlap, however, Aspris will always keep you informed of the nature, purpose and grounds of processing your information either through this Privacy Notice, or additional notice(s) or consent. .

**Special categories of sensitive data-** We process sensitive personal information for the following purposes:

- To provide the young people under our services with physical or mental health care, social care or treatment,
- Safeguarding reasons,
- For legal and/or regulatory reasons, for example, to comply with health and safety obligations, to respond to requests for information from the police, to conduct background and driving license checks.

**Aspris does not sell, share or give information to third parties for marketing purposes.**

## 5. How long we will use your personal information

We will retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are available in our retention policy which is available on the Aspris Hub as *ALE\_Form05\_v05*. External individuals can also access the mentioned retention document by reaching out to [dataprotection@aspris.com](mailto:dataprotection@aspris.com)..

We are obligated by law to retain specific information regarding residents, young people, and students for a designated period. All personal information will be deleted or securely destroyed

at the appropriate time, and we will not retain this information longer than is required or permitted by the law.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee, worker or contractor of Aspris, we will retain and securely destroy your personal information in accordance with our retention policy, applicable laws and regulations.

## **6. How we store your personal information**

The personal information we collect is stored in various formats- both paper-based and electronic. We implement appropriate and effective technical, organisational, and administrative measures to safeguard all of your information and ensure its security.

## **7. Protection of your personal information**

Aspris takes the security of all the information and personal data collected very seriously. In addition to implementing a range of technical, organisational, and administrative measures, Aspris restricts access to information strictly to those individuals who possess a legitimate and lawful need to access such data.

All members of staff are required to undertake regular and periodic module based and live data protection and confidentiality training, and our privacy and security guidelines are clearly communicated to all Aspris employees. We will only send your personal information that we need to share with any third parties either as a legal requirement or through an anonymised, pseudonymised or encrypted process securely. Third parties will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

All personal data is stored on servers located within data centres in the UK. There may however be instances when data is temporarily situated outside the UK but within the EU. We have established appropriate mechanisms to evaluate the implications of any necessary data transfers, which are conducted through a comprehensive Data Transfer Impact Assessment ('DTIA') carried out by the Data Protection Team at Aspris.

## **8. How we may share your personal information with third parties**

We will share your personal information with third parties where it is required by law, for public interest, where it is necessary to be able to provide you with our services, to protect your interests (or someone else's interests) or where we have another legitimate interest in doing so.

Aspris engages with distinct third-party service providers to fulfil various essential and lawful functions including, but not limited to, recruitment, brand promotion, provision of financial and salary sacrifice assistance, marketing promotions, background checks, among others. These third parties may employ cookies, web beacons, and other tracking and storage technologies to gather user information. This information may be used to promote their services, as well as to target and deliver advertisements to the users. To opt out of the collection and use of information

for ad targeting, and to exercise your right as a Data Subject, please refer to the terms and conditions on the third-party vendors' websites.

Additional information and assistance pertaining to targeted behavioural advertising can be accessed through the [ICO's website](#).

## **9. What type of third-party service providers may process your personal information?**

Aspris may engage third-party services for various legitimate and lawful purposes to facilitate the provision of their services. These may include, but is not limited to, the following:

- Commissioning authorities such as local authorities, external therapists, social workers and local systems,
- Third party vendors use to provide essential IT services such as educational applications and systems used,
- Third party services for recruitment purposes,
- Third party services for background checks.

When we use third party service providers to process personal data on our behalf, we require them to commit to compliance with relevant data protection legislation. Should you require further information regarding this matter, please do not hesitate to contact the Data Protection Team at [dataprotection@aspris.com](mailto:dataprotection@aspris.com).

## **10. Accuracy of personal information**

Aspris facilitates the maintenance of accurate, complete, and up-to-date personal information. Should any of your information change, we kindly request that you inform us promptly so that we can ensure our records are accurate.

## **11. Automated decisions**

Automated decision-making is the process of making a decision by automated means without any human involvement. These decisions can be based on factual data, as well as on digitally created profiles or inferred data.

Aspris will not subject you to decisions that may significantly impact you based solely on automated decision-making, unless there is a lawful basis for such actions, and you have been duly informed.

Aspris does not involve in automated decision making at the moment and we do not envisage that any decisions regarding you will be made through automated means in the foreseeable future, however, if there are any changes to this position, you will be duly notified.

## **12. Access to personal information**

Individuals who have in any manner associated with Aspris and have shared their information with us have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's educational record, contact the Data Protection Team at [dataprotection@aspris.com](mailto:dataprotection@aspris.com).

We reserve the right to not process any request for access that is deemed frivolous or vexatious, that compromises or otherwise impacts the privacy of others, that is impractical, or for which access is not mandated by law. We will communicate this to you in writing should any of these circumstances apply to your request.

### **13. Your rights**

Under the UK GDPR, you have certain rights that you need to be aware of. The rights available to you will depend on our reasons for processing your information.

In addition to gaining access to your personal information, you also have the right to-

- Restrict the processing of certain information,
- Object to processing of personal data that is likely to cause, or is causing, damage or distress
- Prevent processing for the purposes of direct marketing
- Object to decisions being taken by automated means
- In certain circumstances, have inaccurate personal data rectified, blocked, erased ('Right to be Forgotten'), or destroyed
- Data portability

Should you believe you possess any of these rights or wish to exercise them, please let us know.

## **PRIVACY NOTICE FOR YOUNG PEOPLE (RESIDENTS AND STUDENTS) IN OUR CARE**

This notice applies to our service users, including residents and students, under the care of Aspris. We may update this notice at any time but if we do so, we will provide you with an updated version of this notice available on our website as soon as reasonably practical. It is important that you read and retain this notice, together with any other notice we may provide 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 and what your rights are under data protection legislation.

### **1. Collection, storage and use of young people's personal data**

You may be asked to provide your personal information anytime you are in contact with Aspris. Aspris and its affiliates may share this personal information with each other but will always use it in accordance with this Privacy Notice. We may also combine it with other information to provide

and improve our services. You are not required to provide the personal information that we may request, but, if you chose not to do so, in many cases we will not be able to provide you with our services or respond to any queries you may have.

We understand the importance of taking extra precautions to protect the privacy and safety of the young people under our care. The young person information that we collect, including special categories of sensitive personal information, hold and share may include:

- Personal information (such as name, unique pupil number and address)
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility)
- Attendance information (such as sessions attended, number of absences and absence reasons)

Where the young person is also a resident, we may also collect the following information:

- Physical and mental health information
- NHS number
- National Insurance number

We may also use media of young people such as photos, videos or audio recordings to share our work with the community. The Media shared will be considered the young person's Personal Information. We share information by putting it on Aspris website, social media platforms, podcasts, brochures and/or newsletters for marketing purposes.

**No media relating to young people in care will be shared externally in the company's website, social media platforms podcasts, brochures and or newsletters for any marketing purposes.**

We use the young person's information to comply with the law regarding data sharing for the following:

- To support pupil learning
- To monitor and report on pupil progress
- To provide appropriate pastoral care
- To assess the quality of our services

When you contact us, we may collect a variety of information, including your name, postal address, telephone number, email address, contact preferences or credit card information.

If our services are commissioned for the young person by third parties (your GP, local authorities, clinical commissioning groups, private medical insurers etc.) they will provide us with a variety of information, including the young person's name, postal address, telephone number, email address and medical/educational history.

During the course of the young person's time with us we will maintain information about the young person in their personal records like their name, address and date of birth together with details of any care and/or treatment that they are undergoing or had undergone in the past.

Whilst the majority of young person information requested by us is mandatory for providing our services, some of it is provided to us on a voluntary basis. We will inform you whether you are required to provide certain young person information to us or if you have a choice in this.

### **How we store your personal information**

The personal information we collect is stored in a variety of paper and electronic forms. We have appropriate and adequate technical and administrative processes in place to make sure that all your information is hosted and retained securely.

## **2. Protection of your personal information**

Aspris takes the security of the young person's and your personal information very seriously. To make sure the personal information is protected, we have a series of technical and administrative measures in place. Access is limited only to those of our employees who need to access it to provide services to the young person.

All members of staff are required to undertake regular and periodic, module based and live data protection and confidentiality training, and our privacy and security guidelines are clearly communicated to all Aspris employees. We will only send your personal information that we need to share with any third parties either as a legal requirement or through an anonymised, pseudonymised or encrypted process securely. Third parties will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

All personal data is stored on servers within data centres in the UK, although at times they may be temporarily outside the UK, but within the EU.

## **3. Purpose of use of your personal information**

In most cases, Aspris will use the personal information we collect and store about the young person to provide services to them. We also use it to help us develop, operate, deliver, and improve the quality of the care we provide or, more generally, the type of services that we offer. From time to time, we may use the young person's personal information to send important notices, such as updates to the young person's care and/or treatment plans or changes to our terms, conditions and policies. **Because this information is important to the young person's and their parents' or carers' interaction with Aspris, you may not be able to opt out of receiving these communications.**

Aspris and its affiliates may share this personal information with each other but will always use it in accordance with this Privacy Notice. We may also combine it with other information to provide and improve our services.

We will only use your personal information when we are lawfully required to do so. Your personal information will be used under the following circumstances:

- Where you have provided us with your consent

- Where we need to comply with a legal or a contractual obligation
- Where it is necessary for legitimate interests pursued by us or a third party and your interests and fundamental rights do not override those interests

We may also use your personal information in the following circumstances (which are expected to be infrequent):

- Where we need to protect your interests (or someone else's interests)
- Where it is needed in public interest or for official purposes

Some of the above grounds may overlap and there may be grounds that justify our use of your information. In these circumstances, you will either receive an opportunity to consent or/and comprehensive information regarding the nature of the data being processed, the use of your information, as well as the purpose and legal grounds under which such information will be processed.

**Special categories of sensitive data-** We process sensitive personal information for the following purposes:

- To provide the young people under our services with social care, physical or mental health care,
- Safeguarding reasons
- For legal reasons, for example, to comply with health and safety obligations or to respond to requests for information from the police

**Profiling** – Profiling refers to analysis of aspects of an individual's personality, behaviour, interests and habits to make predictions or decisions about them.

Aspris may need to profile information relating to the young people that it provides its services to. We are aware that Article 9 of the UK GDPR prohibits processing of sensitive personal information, however, the UK GDPR also provides exceptions under which data can be processed. Aspris will process sensitive personal data under Article 9(d) which allows processing if the processing is carried out in the course of its legitimate activities with appropriate safeguards by an organisation.

**Aspris does not sell, share or give information to third parties for marketing purposes.**

We may also use personal information for internal purposes such as auditing, data analysis, and research to improve our services and our communication with you and the young person.

We may use your personal information to test our computer systems such as the software we use to store a young person's health, social, care and education records to improve our services. If you do not wish for the information to be used for these purposes, you can let us know.

If you don't want to be contacted by us after the young person is no longer using our services, you can opt out anytime by letting us know.

#### **4. Sharing or disclosing any personal information with third parties**

We routinely share young person's information with:

- schools or placements that the young people attend after leaving us,
- local authorities
- the Department for Education ('DfE')
- Ofsted

We share young person's personal data with the DfE on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring.

To find out more about the data collection requirements placed on us by the DfE (for example; via the school census) go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

We do not share information about the young people in our care with anyone without consent unless the law and our internal policies allow us to do so. As such, we will only share personal information with other third parties in the following circumstances:

- Where you have given your consent to the information being shared
- Where there are issues or concerns like the health and safety of yourself, the young person or others
- Where there is a legal requirement or responsibility to share the information

Personal information of service users may also need to be shared with third parties such as commissioning authorities to make arrangements for funding and/or payment of services received.

Additionally, in the event of a reorganization, merger, or sale of Aspris or any part of it, we may transfer any and all personal information we collect to the relevant third party.

#### **5. When might we transfer your personal information overseas?**

We may transfer the personal information we collect about you to countries within the European Economic Area (EEA). There are adequacy regulations in respect of these countries. This means that the countries to which we transfer your data are deemed to provide an adequate level of protection for your personal information.

We may, in limited circumstances, transfer personal information we collect about you to other parts of the world outside the United Kingdom ('UK') and EEA where there has not been an adequacy decision, for example, when engaging a third-party supplier such as an IT software provider. This means that these countries are not deemed to provide an adequate level of protection for your personal information.

Whenever we transfer your personal information outside of the UK or the EEA, we will ensure that we take steps necessary to comply with applicable legal requirements so that your personal information receives an adequate level of protection. We will ensure that adequate technical and

organisational safeguards are in place by using appropriate contractual mechanisms, such as the EU Standard Contractual Clauses (EU SCCs), Data Protection Agreements (DPAs) and Binding Corporate Rules (BCRs), where applicable.

## **6. Accuracy and retention of personal information**

Aspris makes it easy for you to keep your and the young person's personal information accurate, complete, and up to date. If any of your information changes, please let us know so that we can update our records.

We are legally required to hold certain information about you and the young person for a set period of time. All personal information will be deleted or securely destroyed at the appropriate time, and we will not keep the personal information for longer than is required or permitted by law. Details of retention periods for different aspects of your personal information are available in our retention policy which can be accessed by reaching out to [dataprotection@aspris.com](mailto:dataprotection@aspris.com).

## **7. Access to personal information**

Parents and young persons have the right to request access to personal information we hold about you. To make a request for your personal information, or be given access to your child's educational record, you can make a request for information to the school or the care home that the young person is placed at or contact us at [dataprotection@aspris.com](mailto:dataprotection@aspris.com).

We are not required to process any request for access which is frivolous or vexatious, jeopardise or otherwise affects the privacy of others, are impractical, or for which access is not otherwise required by law. We will let you know in writing if any of these circumstances apply to your request.

## **8. Your rights**

Under the UK GDPR, you have certain rights that you need to be aware of. The rights available to you will depend on our reasons for processing your information.

In addition to gaining access to your personal information, you also have the right to-

- Restrict the processing of certain information,
- Object to processing of personal data that is likely to cause, or is causing, damage or distress
- Prevent processing for the purposes of direct marketing
- Object to decisions being taken by automated means
- In certain circumstances, have inaccurate personal data rectified, blocked, erased ('Right to be Forgotten'), or destroyed
- Data portability

Should you believe you possess any of these rights or wish to exercise them, please let us know.

Aspris may, in certain circumstances, be unable to fulfil a rights request were doing so would conflict with statutory obligations or legal requirements relating to the maintenance of our records and documentation. In situations where we are unable to action the right you wish to

exercise, we will provide you with a clear and comprehensive explanation outlining the basis for our refusal.

## PRIVACY NOTICE FOR ASPRIS COLLEAGUES AND CANDIDATES

This notice applies to current and former employees, workers, contractors, candidates applying for employment and any other individuals who associate with Aspris for any services or request for information. This notice does not form part of any contract of employment or other contract to provide services.

We may update this notice at any time and if we do, we will post an updated version on our website as soon as reasonably practicable. We collect personal data about you, so please make sure that you read this notice, together with any other privacy notice we may provide 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 and what your rights are under data protection legislation.

### 1. Collection, storage and use of personal data

You may be asked to provide your personal information anytime you are in contact with Aspris. Aspris and its affiliates may share this personal information with each other but will always use it in accordance with this Privacy Notice. We may also combine it with other information to provide and improve our services. You are not required to provide the personal information that we may request, but, if you chose not to do so, in many cases we will not be able to provide you with our services or respond to any queries you may have.

We understand the importance of taking extra precautions to protect the privacy and safety of all the individuals associated directly or indirectly with us. We collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, address, telephone numbers and personal email addresses,
- Gender,
- Date of birth,
- Marital status and dependants,
- Next of kin and emergency contact information,
- National Insurance Number (NIN),
- Bank account details, payroll records and tax status information,
- Salary, annual leave, pension and benefits information,

- Records/results of any pre-employment checks (including credit and fraud checks),
- Start date and, if different, the date of your continuous employment,
- Leaving data and your reason for leaving,
- Location of employment or workplace,
- Attendance records or timesheets,
- Copy of passport and driving licence,
- Employee personal relationships with anyone else working for the company,
- 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),
- Employment records (including job titles, work history, working hours, holidays, training records and professional memberships),
- Employment and management records will include disciplinary and grievance records, flexible working requests, performance records, appraisals and training records, holiday and attendance records, terms and conditions of employment,
- Compensation history,
- Performance information,
- Disciplinary and grievance information,
- CCTV footage, audio CCTV recordings (in limited circumstances) and other information obtained through electronic means such as swipe card records,
- Information about your use of our information and communications systems,
- Media such as photographs, audio and video recordings (after gaining appropriate consent),
- Results of HMRC employment status check, details of your interest in and connection with intermediary through which your services are supplied.

We may also collect, store and use the following sensitive special categories of personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions,
- Trade Union membership,
- Information about your physical and mental health, including any medical condition, health and sickness records including:
  - Pre-employment medical screening tests

- Information on vaccinations received
- Where you leave employment and under any share plan operated by a group company the reason for leaving is determined to be ill-health, injury or disability, the records relating to that decision
- Details of any absences (other than holidays) from work including time on statutory paternity leave and sick leave
- Any health information in relation to a claim made under a health insurance scheme; and
- Where you leave employment and the reason for leaving is related to your health, information about that condition needed for pension and health insurance purposes
- Genetic information (where applicable)
- Biometric records for the purposes of time recording attendance at sites; and
- Information about criminal convictions and offences

### **How we collect your personal information**

We collect personal information about employees, worker and contractors through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies such as immigration consultants, or the Disclosure and Barring Service.

We may also collect personal information from the trustees or managers of pension arrangements operated by a group company.

We will collect additional personal information in the course of job-related activities throughout the period of you working for us.

### **How we store your personal information**

The personal information we collect is stored in a variety of paper and electronic forms. Regardless, we have appropriate and adequate technical and administrative processes in place to make sure that all your information is kept secure.

## **2. Protection of your personal information**

Aspris takes the security of all individuals' personal information very seriously. To make sure the personal information is protected, we have a series of technical and administrative measures in place. Access to any information is limited only to those who need to access it to provide appropriate services.

All members of staff are required to undertake regular and periodic, module based and live data protection and confidentiality training, and our privacy and security guidelines are clearly

communicated to all Aspris employees. We will only send your personal information that we need to share with any third parties either as a legal requirement or through an anonymised, pseudonymised or encrypted process securely. Third parties will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

All personal data is stored on servers within data centres in the UK, although at times they may be temporarily outside the UK, but within the EU.

### **3. Purpose of use of your personal information**

We will only use your personal information when the law allows us to. Mostly comply, we will use your personal information in the following circumstances:

- Where we need to perform the contract, we have entered into with you (under employment)
- Where we need to comply with a legal obligation
- Where it is necessary for legitimate interests pursued by us or a third party and your interests and fundamental rights do not override those interests
- Where we need to determine how appropriate your application is for employment

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else's interests.).
- Where it is needed in the public interest or for official purposes.

The situations in which we will use your personal information include:

- Deciding about your recruitment or appointment (for example CV, application form)
- Checking you are legally entitled to work in the UK
- Paying you and, if you are an employee or deemed an employee for tax purposes, deducting tax and national insurance contributions
- Providing the following benefits to you: salary, pensions, insurance and benefits administration (including pensions)
- Enrolling you in a pension arrangement in accordance with our statutory automatic enrolment duties
- Liaising with the trustees or managers of a pension arrangement operated by a group company, your pension provider and any other provider of employee benefits
- Administering the contract we have entered with you
- HR, business management, planning purposes
- Making decisions about salary reviews or compensation

- Conducting inductions, appraisals or performance reviews, handling disciplinary and grievance matters, performance management, career planning, training, promotion, secondments, etc.
- Dealing with legal disputes involving you, or other employees, workers and contractors, including accident at work
- managing disability, sickness or other types of leave, e.g. maternity leave, paternity leave
- Ascertaining your fitness to work
- To facilitate settling of expenses staff have incurred in the course of the business in accordance with their employment contracts
- To facilitate communications between employees and members within the business
- Internal record keeping purposes to enable us to maintain an audit trail in respect of approvals of decisions, voting and any internal surveys
- Managing and safeguarding our management, IT and communications systems
- Security reasons
- Complying with health and safety obligations
- To prevent fraud
- Performing workforce analysis, project management and planning
- Education, training and quality purposes
- Equal opportunities monitoring
- Legal reasons, e.g. complying with employment and health and safety obligations, ensuring you are legally entitled to work in the UK, establishing or defending legal claims, for record keeping purposes (including, without limitation to keep pension records or records for tax purposes), to defend our legal rights etc.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution
- To test our computer systems to improve our services to you i.e. when there are changes to the National Minimum Wage or Living Wage. If you do not wish for your information to be used for these purposes, you can let us know

Some of the above grounds may overlap and there may be several grounds that justify our use of your information.

We process sensitive personal information for the following purposes:

- for security purposes and to assist with time recording at various premises by using biometric measurement data;

- managing sickness absence, providing reasonable adjustments in the workplace and administering benefits; and
- for legal reasons, e.g. to comply with employment and health and safety obligations.

We will use information about your gender or 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.

### **What happens if you fail to provide personal information**

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with any legal obligations (such as to ensure the health and safety of our workers).

### **How changes of purpose will be managed**

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will publish an updated Privacy Notice on our website.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **4. Sharing or disclosing any personal information with third parties**

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

### **What type of third-party service providers' process your personal information**

"Third parties" includes third-party service providers (including contractors and designated agents) and other entities within our group and their employees, representatives, strategic investors and their respective advisors.

Aspris engages these third parties to provide certain services to the business. In order for them to provide their services, we need to allow them to process personal data necessary for their tasks. When we use third parties to process personal data on our behalf, we require them to commit to compliance with relevant data protection legislation.

The following activities are carried out by third-party service providers:

- payroll, pension administration, benefits provision and administration, IT services, management and data storage and intranet services, occupational health/other benefits,
- Digital right to work checks

- The disclosure and barring service

### **How we may share your personal information with third parties**

We may share your personal information with other third parties:

- **Sale or restructuring.** We may need to share your personal information if a sale or restructuring of all or part of Aspris occurs. In this situation we will, so far as possible, share anonymised data with the other parties before the transaction completes. Once the transaction is completed, we will share your personal data with the other parties if and to the extent required under the terms of the transaction.
- **Request from a regulator or otherwise to comply with the law.** We may also share your personal information:
  - (i) with a regulator;
  - (ii) to comply with the law; or
  - (iii) in other circumstances when we are legally permitted to do so. This may include making returns to HMRC and disclosures to any other regulatory bodies which have authority over Aspris or its group, our professional advisers (such as lawyers, auditors, immigration advisors etc.), disclosures to stock exchange regulators, disclosures to shareholders such as directors' remuneration reporting requirements and to such third parties as we reasonably consider necessary in order to prevent crime.

If we are making an application to the Home Office or other government body on your behalf we may share your personal information with them as part of the application or investigations that arise in connection with immigration control. Data shared with the Secretary of State may subject to additional immigration exemptions.

Aspris engages with distinct third-party service providers to fulfil various essential and lawful functions including, but not limited to recruitment, brand promotion, provision of financial and salary sacrifice assistance, among others. These third parties may employ cookies, web beacons, and other tracking and storage technologies to gather user information. This information may be used to promote their services, as well as to target and deliver advertisements to the users. To opt out of the collection and use of information for ad targeting, and to exercise your right as a Data Subject, please refer to the terms and conditions of the third-party vendor.

Additional information and assistance pertaining to targeted behavioural advertising can be accessed through the ICO's website.

### **5. When might we transfer your personal information overseas?**

We may transfer the personal information we collect about you to countries within the European Economic Area (EEA). There are adequacy regulations in respect of these countries. This means that the countries to which we transfer your data are deemed to provide an adequate level of protection for your personal information.

We may, in limited circumstances, transfer personal information we collect about you to other parts of the world outside the United Kingdom ('UK') and EEA where there has not been an adequacy decision, for example, when engaging a third-party supplier such as an IT software provider. This means that these countries are not deemed to provide an adequate level of protection for your personal information.

Whenever we transfer your personal information outside of the UK or the EEA, we will ensure that we take steps necessary to comply with applicable legal requirements so that your personal information receives an adequate level of protection. We will ensure that adequate technical and organisational safeguards are in place by using appropriate contractual mechanisms, such as the EU Standard Contractual Clauses (EU SCCs), Data Protection Agreements (DPAs) and Binding Corporate Rules (BCRs), where applicable.

## **6. Accuracy and retention of personal information**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

We are legally required to hold certain information about you for a set period of time. All personal information will be deleted or securely destroyed at the appropriate time, and we will not keep the personal information for longer than is required or permitted by law. Details of retention periods for different aspects of your personal information are available in our retention policy which can be accessed by reaching out to [dataprotection@aspris.com](mailto:dataprotection@aspris.com).

## **7. Access to personal information**

You are entitled to see what personal information we hold about you at any time. This Privacy Notice outlines the information we hold about you and why. If you wish to access your personal information, please contact us at [dataprotection@aspris.com](mailto:dataprotection@aspris.com).

We are not required to process any request for access which is frivolous or vexatious, jeopardises or otherwise affects the privacy of others, are impractical, or for which access is not otherwise required by law. We will let you know in writing if any of these circumstances apply to

## **8. Your Rights**

Under the UK GDPR, you have certain rights that you need to be aware of. The rights available to you will depend on our reasons for processing your information.

In addition to gaining access to your personal information, you also have the right to-

- Restrict the processing of certain information,
- Object to processing of personal data that is likely to cause, or is causing, damage or distress
- Prevent processing for the purposes of direct marketing

- Object to decisions being taken by automated means
- In certain circumstances, have inaccurate personal data rectified, blocked, erased ('Right to be Forgotten'), or destroyed

Should you believe you possess any of these rights or wish to exercise them, please let us know.

Aspris may, in certain circumstances, be unable to fulfil a rights request were doing so would conflict with statutory obligations or legal requirements relating to the maintenance of our records and documentation. In situations where we are unable to action the right you wish to exercise, we will provide you with a clear and comprehensive explanation outlining the basis for our refusal.

## Cookies

### How we use cookies

This website uses cookies to improve its functionality and to monitor site performance.

Cookies are small text files which are placed on your computer by websites you visit. They are widely used in order to ensure websites work efficiently, alongside providing insight about the volume of visitors to the website and how visitors move around the website. This in turn helps us to develop the user experience.

The table below explains the cookies we collect and the information they store.

Cookie	Name	Purpose
Google Analytics	_ga _gid	These cookies are used to collect information about how visitors use our website. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they viewed.  <a href="#">Click here to read Google's overview of privacy and safeguarding data</a>
ResponseTap	AdiLP AdiS AdiV AdiVi	These cookies enable the display of a dynamically generated phone number through ResponseTap call tracking software. This provides a better understanding of visitor interaction between the website from referral channel (e.g. Google search) to the point at which contact is made via phonecall. The cookies used by ResponseTap demonstrate the user journey through the site and help improve online customer experience.

		<a href="#">Click here to read ResponseTap's cookie policy</a>
Pardot	visitor_id pi_opt_in visitor_id-hash lpv pardot	These cookies collect information in an anonymous form to track visitor sessions and associated browsing actions. Pardot cookies don't store personally identifying information, only a unique identifier.  <a href="#">Click here to read more about Pardot's cookie policy</a>

### How to change your cookie settings

To find out more about cookies, including how to see what cookies have been set, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

To opt out of being tracked by Google Analytics across all websites visit <https://tools.google.com/dlpage/gaoptout>.

You can change the settings on your browser to prevent cookies being stored on your computer or mobile device without your explicit consent.

The following links detail how to manage cookies on popular web browsers:

- [Google Chrome](#)
- [Safari](#)
- [Microsoft Internet Explorer](#)
- [Microsoft Edge](#)
- [Mozilla Firefox](#)

For information relating to other browsers, visit the browser developer's website, where the 'help' section will normally provide details on how to manage the cookie settings.

### Social media

Contacting us through social media

We use third party providers, Hootsuite, Facebook Business Manager and Linked-In Business Solutions, to help us manage our social media output and interactions.

If you send us a private message through social media, the message will be stored by Hootsuite for six weeks. Messages sent through our Facebook account will be stored by Facebook Business Manager for two weeks. Messages sent through Linked-In will be stored in our Linked-In Inbox for two weeks. Your messages will not be shared with any other organisations.