



## Canary Wharf Group

### Privacy Notice for Employees and Contractors

#### 1. Introduction

We, **Canary Wharf Group plc and all associated group companies ("Canary Wharf Group")** of One Canada Square, Canary Wharf, London, E14 5AB, the **Data Controller**, are committed to respecting the privacy of individuals. This notice outlines how we collect and use your personal information, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights.

Please also refer to our general privacy notice to help you understand how we collect, use and protect your information when you visit [www.canarywharf.com](http://www.canarywharf.com) and any other Canary Wharf Group website and when you visit Canary Wharf in person.

#### 2. What personal information may we collect about you?

Canary Wharf Group collects personal information about its workers for legal, personnel, administrative and management purposes to legitimately manage its business, control costs and effectively implement its policies and procedures, and to enable us to meet our legal obligations as an employer. "Employees" also includes contractors, agents, staff, retirees, temporary Employees, beneficiaries, benefit plan participants and workers.

The term "personal information" in this notice refers to information that does or is capable of identifying you as an individual, for the purpose of applicable data protection legislation (including but not limited to the General Data Protection Regulation (Regulation (EU) 2016/679) (the "GDPR").

We may process sensitive personal information relating to Employees including, as appropriate:

- Information about an employee's physical or mental health or condition in order to monitor sick leave and take decisions as to the employee's fitness for work;
- The employee's racial or ethnic origin or religious or similar information in order to monitor compliance with equal opportunities legislation;
- Any criminal convictions (spent or unspent), fines and other similar judicial records;
- Trade Union membership and political or religious beliefs;
- Biometric data such as finger prints and retina scans to allow access to secure sites
- In order to comply with legal requirements and obligations to third parties;

The types of personal information that we may process includes:

- Your contact details (including, name, home and/or work address, home and/or work telephone and business email address);
- Demographic information such as gender, age, date and location of birth, nationality, education/work history, academic/professional qualifications, employment details, hobbies, any family dependents;
- Your financial information (including bank account numbers, salary, bonus, records of earnings, tax code, tax and benefit contributions, expenses claimed whilst on company business, car allowance (if applicable), amounts insured, amounts claimed);
- Information held on the electronic document management system, including information relating to trade contractor prequalification, applications for tenders and trade contracts;

- Personal information contained within your Personnel File including:
  - Position held, staff level or management grade at Canary Wharf Group;
  - Records of leave (annual leave, sickness, maternity/paternity, sabbaticals, military reserve or compassionate leave);
  - Performance management information;
  - Records of training courses attended\qualifications obtained;
  - Employee recognition information;
  - Annual workplace benefit selections;
  - Details of any incidents and/or accidents;
  - Information relating to grievances;
- Details of gifts and/or hospitality offered, given or received, or any other potential conflicts of interest;
- Audio, video recordings, live stream footage and/or videography or other image(s), if your consent has been given, in connection with Canary Wharf Group's business purposes, for advertising promotion, training and/or other commercial and business purposes;
- Personal information obtained when carrying out our business activities including but not limited to information collected from Canary Wharf Group Personal Computers or Smart Devices supplied to workers including:
  - IP address;
  - Websites and Intranet sites visited;
  - Emails sent to/from your corporate email address;
  - Application credentials including username and passwords;
  - Individual system/application audit information, including log-in data, edit, modify and delete data;
  - Details of telephone numbers dialled or received on Company telephones, mobile data usage and individual handset monthly charges;
  - CCTV Surveillance footage used for crime prevention and monitoring safety of our workers;
  - Site access/swipe card information;
- Other Human Resources data relating to Employees including, but not limited to, emergency contact information, passport details, languages and proficiency, citizenship, immigration status, information about your right to work in the UK, retirement date and licences/certificates.

### **3. How do we use your personal information?**

Canary Wharf Group uses personal information in the context of your employment for:

- Administering your employment relationship with us:
  - Paying and Rewarding Employees;
  - Providing any benefits which form part of an employee's contract of employment, including but not limited to pension schemes;
- Complying with legal requirements such as calculating and remitting payroll and other taxes, making benefit contributions and fulfilling legal reporting requirements;
- Processing employment data necessary for HR operational, administrative and recruitment purposes and to otherwise manage the employment relationship including:
  - Managing work assignments (Employees Resourcing, identifying and managing talented and high-potential individuals);
  - Strategic Workforce planning, to plan and forecast workforce requirements;
  - Staff Learning & Development;
  - Travel Administration and Payment of Expenses;
  - Processing family data in the context of HR Records i.e. Next of Kin, Emergency Contact, Benefits and Insurance;
  - Reporting and management information for budgeting and forecasting;
  - Implementing new HR systems or applications to support company processes, which with appropriate safeguards in place may involve system development testing;
- Processing Information in support of our obligations under the Health & Safety at Work Act to ensure, so far as is reasonably practicable, the health, safety and welfare at work of all employees including the processing of:
- Processing of sensitive information about you including:

- Information relating to your physical or mental wellbeing, where the processing is undertaken for the assessment of your working capacity or for provision of medical products or on-site facilities or medical devices to assist you in the workplace where the assessment is undertaken by an occupational health practitioner;
- Any spent or unspent Criminal Convictions to assess your suitability for a job role, or for provision of access to sites where enhanced security is required;
- Ethnicity, Racial Origin or Religious beliefs to ensure equal opportunities in our recruitment processes and to monitor compliance with equal opportunities legislation;
- Trade Union membership, for appropriate deduction of membership fees from payroll;
- Biometric data such as finger prints and retina scans to allow access to secure sites;
- Promoting and/or publicising your personal and/or professional achievements in internal publications;
- Processing audio, video recordings, live stream footage and/or videography or other image(s) for advertising, marketing and/or promotional purposes, if your consent has been provided to do so;
- Investigate, respond to and/or process any complaints, claims for loss, damage and/or injury;
- Establishing, exercising, enforcing or defending legal claims, conducting internal investigations of suspected breaches of corporate policies and monitoring Employee's use of company email, system, internet services and company telephone devices;
- Processing information for system, network and cyber security for the purpose of preventing unauthorised access, intrusion, misuse of company systems, networks, computers and information, including prevention of personal data breaches and cyber-attacks;
- Processing information for the provision of on-site facilities including but not limited to parking.

#### **4. Who has access to your personal information?**

Your information will be processed by our Employees in order to fulfil our obligations to you as outlined in this notice. We may also share your details with third parties including:

- Contractors working on behalf of or in partnership with Canary Wharf Group;
- Our third-party suppliers/service providers who perform functions on our behalf under contract, support our systems, operations and processes;
- Tax, audit, or other authorities when we believe in good faith that the law or other regulation requires us to share this information, for example where processes and system are being compliance assessed by Canary Wharf Group's corporate audit or their representatives;
- Law enforcement or other regulatory bodies who can legally request access to information about you for prevention and detection of crime, the apprehension or prosecution of offenders, and the assessment or collection of tax;
- Business transfers –where we merge with or are acquired by another business or company in the future, we may share your personal information with the (prospective) new owners of the business or company.

#### **5. Information security and International Transfers**

Canary Wharf Group is committed to being transparent and taking all reasonable and appropriate steps to keep your personal information secure and to protect it from misuse, loss or unauthorised access. We do this by having in place a range of appropriate technical and organisational measures. We are also obliged to tell you where we use services that transfer your information internationally. At Canary Wharf Group we have a strict selection process when it comes to our suppliers/ service providers and we apply strict requirements within our contracts to ensure your data is kept within safe hands.

Canary Wharf Group may on occasion outsource services or supplies to international suppliers outside the UK and EEA\*. In the event that we do transfer personal information to suppliers or service providers outside the UK and EEA, we will only do so where it is compliant with applicable data protection legislation and the means of transfer provides adequate safeguards in relation to your personal information.

\*The European Economic Area (EEA) currently comprises the Member states of the European Union plus Norway, Iceland and Liechtenstein.

## **6. How long will you keep my personal information?**

Information is only kept as long as necessary for the period it is required. When deciding how long we keep your information we take into account any minimum retention requirements set out in law. Canary Wharf Group will only use your information as long as necessary.

Employee/Contractor information may be kept for a minimum of 10 years after your employment/assignment ceases. Canary Wharf Group's financial reporting means we must keep certain information to be held for 7 years. Canary Wharf Group will keep information pertaining to immigration status or right to work status indefinitely to comply with legal obligations. Some data may be stored for longer than the stated retention period for the purposes of business continuity. CCTV footage is held securely for 28 days (unless there are grounds for preserving it) and data relating to visitor passes is held for 39 months following pass card or QR code deactivation. Please contact [dataprotection@canarywharf.com](mailto:dataprotection@canarywharf.com) if you require further information.

## **7. Changes to this notice**

Just as our business changes constantly, this notice may also change. To assist you, this notice has an effective date set out at the end of this notice.

## **8. What rights do I have with regards to my personal data?**

To exercise your privacy rights please send your request in writing. We may be required to verify your identity for security purposes. Your rights are outlined below:

- The right to access information we hold about you, why we have that information, who has access to the information and where we obtained the information from;
- The right to correct and update the information we hold about you. If the data we hold about you is out of date, incomplete or incorrect you can inform us and your data will be updated;
- The right to have your information erased. If you feel we should no longer be using your data you can request that we erase the data that we hold. Upon receiving a request for erasure we will confirm whether it has been deleted or a reason why it cannot be deleted (for example because we have a legal obligation to keep the information or we need it for a legitimate business interest);
- The right to object to processing of your data. You may request that we stop processing information about you. Upon receiving your request we will contact you and let you know if we are able to comply or if we have legitimate grounds to continue to process your data. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or bring or defend legal claims;
- The right to data portability. You have the right to request that we transfer your data to another controller.
- The right to request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- The right to withdraw consent at any time where we are relying on consent to process your personal data.

We will comply with your request where it is feasible to do so, within 30 days of receiving your request. There are no fees or charges for the first request. However additional requests for the same data may be subject to an administrative fee of £25 per request.

To exercise your rights please do so by contacting us using the email or postal address at the end of this notice.

## **9. Consent**

We may rely on the fact that processing is required for the performance of a contract, legitimate interest or other permitted grounds for processing your personal information. Where we need your

consent to hold your information we will ask you to confirm your consent in writing and we will inform you why we are collecting the information, how we will use it, how long we keep it for, who else will have access to it and what your rights are as a data subject.

We do not rely on consent for processing your personal data in the normal course of your employment.

#### **10. Canary Wharf Group's Use of Cookies**

Canary Wharf Group utilises cookies to enhance your browsing experience, details can be found in our Cookies Policy on our websites.

#### **11. What can I do if I'm not satisfied with how my personal information is processed?**

At Canary Wharf Group we aim to ensure all information collected about you is done so fairly and lawfully, whilst implementing robust measures to keep your information secure. If you are not satisfied with the information provided in this notice, please contact us in the first instance so we can resolve your queries or provide you with any additional information required.

Alternatively it is your right to contact your local Data Protection Authority and lodge a complaint. In the UK the lead Data Protection Authority is the Information Commissioner. For more information please visit the Information Commissioner's Office at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) or call them on 0303 123 1113, or you can write to them at the following address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

If you have any queries in relation to this notice, or need more information please do not hesitate to contact us at: [dataprotection@canarywharf.com](mailto:dataprotection@canarywharf.com)

Or by writing to us at:

Data Protection  
Canary Wharf Group  
One Canada Square  
Canary Wharf  
London  
E14 5AB

**Effective date: August 2021**