

Appendix 1

Cyan International Privacy Notice

Introduction

We, Cyan International, are the ‘controllers’ of the information which we collect about you (‘personal data’). Being controllers of your personal data, we are responsible for how your data is processed. The word ‘process’ covers most things that can be done with personal data, including collection, storage, use and destruction of that data.

This notice explains why and how we process your data, and explains the rights you have around your data, including the right to access it, and to object to the way it is processed. Please see the section on ‘Your rights as a data subject’ for more information.

Our Data Protection contact point is vsteven@cyanint.org if you have any queries about this notice or anything related to data protection.

Where employed by Cyan International within the EU or UK, Cyan collects and processes personal data relating to you to manage the employment relationship.

Personal data

‘Personal data’ is any information that relates to a living, identifiable person. This data can include your name, contact details, and other information we gather as part of our relationship with you.

It can also include ‘special categories’ of data, which is information about a person’s race or ethnic origin, religious, political or other beliefs, physical or mental health, trade union membership, genetic or biometric data, sex life or sexual orientation. The collection and use of these types of data is subject to strict controls. Similarly, information about criminal convictions and offences is also limited in the way it can be processed.

Cyan International is committed to protecting your personal data, whether it is ‘special categories’ or not, and we only process data if we need to for a specific purpose, as explained below.

We collect your personal data mostly through our contact with you, and the data is usually provided by you, but in some instances, we may receive data about you from other people/organisations. We will explain when this might happen in this Notice.

Your data and how and why we process it

In general terms, we process your data in order to enter into an employment contract with you, to meet our obligations under that contract, to pay you in accordance with your contract and to administer benefits and entitlements.

In some cases, we need to process data to comply with our legal obligations, for example we are required to check your entitlement to work in the UK, to deduct tax and other amounts required by HMRC, to

comply with health and safety law and to enable you to take periods of leave to which you are entitled. For certain positions it is necessary to carry out criminal records checks.

In other cases, we have a legitimate interest in processing personal data before, during and after the end of the employment relationship. This is needed for a number of essential purposes including to:

- run recruitment, selection and promotion processes
- 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 contractual and statutory rights
- operate and keep a record of disciplinary and grievance processes, to support reasonable levels of conduct within the workplace
- operate and keep a record of employee performance and related processes, to plan for career development, and for succession planning and team management purposes
- operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that you receive the pay or other benefits to which you are entitled
- obtain occupational health advice, to ensure that we comply with duties in relation to individuals with disabilities, meet our obligations under health and safety law, and ensure that you receive the pay or other benefits to which you are entitled
- operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to allow effective management of our teams, to ensure that we comply with duties in relation to leave entitlement, and to ensure that you are receiving the pay or other benefits to which you are entitled
- ensure effective general HR and business administration
- provide references on request for current or former employees
- respond to and defend against legal claims; and
- maintain and promote equality in the workplace

Some special categories of personal data, such as information about health or medical conditions, is processed to carry out employment law obligations (such as those in relation to employees with disabilities, long term ill health issues and for health and safety purposes).

Where Cyan International processes other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is done for the purposes of equal

opportunities monitoring. Data that Cyan International uses for these purposes is collected with the express consent of employees, which can be withdrawn at any time. You are entirely free to decide whether or not to provide such data and there are no consequences of failing to do so. Where a role has an occupational requirement for an individual to be a committed Christian we will also hold data related to your religion and beliefs.

At times, we may further process data which we have already collected. We will only do this if the new purpose for processing it further is compatible with the original purpose that the data was collected for. We will tell you about any further processing before carrying it out.

The specific information that Cyan International may hold on you will include:

- your name, address and contact details, including email address and telephone number
- your date of birth and gender
- the terms and conditions of your employment
- details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with Cyan International
- information about your pay, including entitlement to benefits such as pensions or insurance cover, and details of statutory deductions such as tax, national insurance, student loans and other
- details of your bank account and national insurance number
- information about your marital status, next of kin, dependants and emergency contacts
- information about your nationality and entitlement to work in the UK or another overseas country
- information related to your application to work overseas including copies of your passports, visas, travel arrangements, and any overseas partner specific recruitment process documents
- information related to your secondment to work for an overseas partner
- information about your criminal record where this is relevant to your employment
- details of your schedule (days of work and working hours) and attendance at work
- details of periods of leave taken by you, including holiday, sickness absence, family and other leave, and the reasons for the leave

- details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence
- assessments of your performance, including appraisals, performance reviews and ratings, training you have participated in, performance improvement plans and related correspondence
- information about medical or health conditions, including whether or not you have a disability for which BMS needs to make reasonable adjustments; and
- equal opportunities monitoring information, including information (if you have provided it) about your ethnic origin, sexual orientation, health and religion or belief

Personal data received from third parties

This is a list of your personal data that we may receive from other people or organisations. The list is not exhaustive but covers the type of documents we may need to hold on record.

Data	Source
Personal references	Appointed referees
Tax coding	HMRC
Payroll deductions such as student loans, court orders or other statutory deductions	HMRC

Who we share your data with

For some processing purposes we share your data with third parties. The list is not exhaustive but covers the type of documents we may need to share with third parties. This is a list of the information we may share with external recipients, and for what purpose:

Recipients of your data	Purpose for sharing
HMRC	Payment of tax / NI
BMS Pension Trustee	Payment of pension contribution
Life assurance provider	Arrangement of life cover
Cyan Int auditor	Statutory audit
Access Consortium	Payroll calculations
Travel Agents/Flight bookers	To enable your travel
Embassy and consulates	To acquire your visa
Travel Health Clearance specialists	To ensure you are fit to travel/work overseas
Criminal check agency	To obtain clearance for you to work with vulnerable individuals in certain roles

How we store your data

Your personal data may be held temporarily in hard copy and then in electronic formats. Electronic data, including emails, is stored on our servers or our service provider's servers, which are located and backed up in the UK/European Union.

How long we keep your data

Information about how long we process your data for can be found in the appendix below. Some retention periods are based on legal requirements while others take into account practical needs to keep the data.

Once the applicable retention period expires, unless we are legally required to keep the data longer, or there are important and justifiable reasons why we should keep it, we will securely delete the data.

Your rights as a data subject

As a data subject, you have the following rights in relation to your personal data processed by us:

- To be informed about how your data is handled
- To gain access to your personal data
- To have errors or inaccuracies in your data changed;
- To have your personal data erased, in limited circumstances
- To object to the processing of your personal data for marketing purposes or when the processing is based on the public interest or other legitimate interests
- To restrict the processing of your personal data, in limited circumstances
- To obtain a copy of some of your data in a commonly used electronic form, in limited circumstances
- Rights around how you are affected by any profiling or automated decisions

Withdrawing consent

If we are relying on your consent to process your data, you may withdraw your consent at any time by contacting vsteven@cyanint.org.

Exercising your rights, queries and complaints

If you wish to see your file please contact the Cyan Head of Operations by email to arrange a time when you will be given access in a private room. This will be arranged within four weeks of the request. Our Data Protection Policy allows us to charge for repeat requests of the same data or for refusal of unreasonable requests.

Complaints to the Information Commissioner

You have a right to complain to the Information Commissioner's Office (ICO) about the way in which we process your personal data. You can make a complaint on the ICO's website <https://ico.org.uk/>.

Data Retention Policy for HR records

Data	Retention period
HR file	Up to 7 years from leave date
Payroll records	Up to 7 years from leave date
References given to prospective employers	Up to 7 years from leave date
Executive director HR file	Indefinite
Information of safeguarding concern	Indefinite
Summary record of name, NI number, date of birth, employment dates and positions held	Indefinite

Cyan International is registered as a charity in England and Wales (1129603).