



Date: 25/05/2018

Date Reviewed:

## **Employee Privacy Notice**

Mueller Europe Limited collects and processes personal data relating to its employees to manage the employment relationship. We are committed to being transparent about how we collect and use that data and to meet our data protection obligations.

### **What information does Mueller Europe Limited collect?**

We collect and process a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number, 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 Mueller Europe Limited;
- information about your remuneration, including entitlement to benefits such as pensions or insurance cover;
- 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;
- 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 leave and sabbaticals, 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 the employer needs to make reasonable adjustments;
- details of trade union membership; and

We collect this information in a variety of ways. For example, data is collected through application forms, CVs or resumes; obtained from your passport or other identity documents such as your driving licence; from forms completed by you at the start of or during employment (such as benefit nomination forms); from correspondence with you; or through interviews, meetings or other assessments.

In some cases, we collect personal data about you from third parties, such as references supplied by former employers.

Data is stored in a range of different places, including in your personnel file, in our HR management systems and in other IT systems (including the email system).

## **Why does Mueller Europe Limited process personal data?**

We need to process data to enter into an employment contract with you and to meet our obligations under your employment contract. For example, we need to process your data to provide you with an employment contract, to pay you in accordance with your employment contract and to administer benefit, pension and insurance entitlements.

In some cases, we need to process data to ensure that we are complying with our legal obligations. For example, it is required to check an employee's entitlement to work in the UK, to deduct tax, to comply with health and safety laws and to enable employees to take periods of leave to which they are entitled.

In other cases, we have a legitimate interest in processing personal data before, during and after the end of the employment relationship. Processing employee data allows us to:

- run recruitment 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 ensure acceptable 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 workforce management purposes;
- operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled;
- obtain occupational health advice, to ensure that it complies with duties in relation to individuals with disabilities, meet its obligations under health and safety law, and ensure that employees are receiving the pay or other benefits to which they are entitled;
- operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to allow effective workforce management, to ensure that the organisation complies with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they 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

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 and for health and safety purposes). Information about trade union membership is processed to allow the organisation to operate check-off for union subscriptions.

## **Who has access to data?**

Your information will be shared internally, including with members of the HR (including payroll), your line manager, managers in the business area in which you work and IT staff if access to the data is necessary for performance of their roles.

We share your data with third parties in order to obtain pre-employment references from other employers or obtain employment background checks from third-party providers.

We also share your data with third parties that process data on our behalf, in connection with the provision of benefits and the provision of occupational health services.

Your data may be transferred to countries outside the European Economic Area (EEA) to our head office in America (Mueller Industries) for the purpose of salary reviews. Data is transferred outside the EEA using appropriate safeguards to ensure that your personal data is treated securely and in accordance with data protection legislation.

### **How does Mueller Europe Limited protect data?**

We take the security of your data seriously. We have internal controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.

Where we engage third parties to process personal data on our behalf, we will always ensure that they do so subject to privacy and security obligations consistent with our practices and with applicable laws.

### **For how long does Mueller Europe Limited keep data?**

We will hold your personal data for the duration of your employment. The periods for which your data is held after the end of your employment will depend on the purposes for which we collected and used it for, or to comply with applicable laws or establish, exercise or defend our legal rights.

### **Your rights**

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require we change incorrect or incomplete data;
- require we delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where we are relying on its legitimate interests as the legal ground for processing; and
- 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 Mueller Europe Limited's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact the HR Department. You can make a subject access request by contacting the HR Department.

If you believe that Mueller Europe Limited has not complied with your data protection rights, you can complain to the Information Commissioner.

### **What if you do not provide personal data?**

You have some obligations under your employment contract to provide Mueller Europe Limited with data. In particular, you are required to report absences from work and may be required to provide information about disciplinary or other matters under the implied duty of good faith. You may also have to provide us with data in order to exercise your statutory rights, such as in relation to statutory leave entitlements. Failing to provide the data may mean that you are unable to exercise your statutory rights.

Certain information, such as contact details, your right to work in the UK and payment details, have to be provided to enable Mueller Europe Limited to enter a contract of employment with you. If you do not provide other information, this will hinder our ability to administer the rights and obligations arising as a result of the employment relationship efficiently.

A handwritten signature in black ink, appearing to be 'C. Sp'.

**Head of European Operation**