

Percussion Play Limited – Employee Privacy Notice

Percussion Play issues this Privacy Notice to all prospective, current and former employees, workers, interns, volunteers and contractors, for the purposes of providing clear information about collection, processing and storage of their personal data. This Privacy Notice has been produced to satisfy our legal responsibilities in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018) collectively referred to as the Data Protection Regulations.

PURPOSE

Percussion Play Limited is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you, both before, during and after your working relationship with us, in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA), collectively referred to as the Data Protection Regulations.

DATA CONTROLLER

Percussion Play Ltd (company registration number 07639169) is the Data Controller and responsible for your personal data.

This notice does not form part of any contract of employment or other contracts to provide services. We may update this notice at any time.

It is important that you read this notice, together with any other applicable privacy notice(s) we may provide both now and in the future, so that you are fully aware of the detail and rationale in relation to us using such information when collecting or processing personal information about you.

DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about a living, identifiable individual.

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

- Personal and contact details, for example – name, title, addresses, telephone numbers, personal email addresses, date of birth, sex, gender, marital status, dependents
- Next of kin and emergency contact information
- National Insurance number
- Salary details, annual leave, pension, and benefits and entitlements information
- Start date
- Copies of passports, right to work documents, visas and other immigration data.
- Recruitment information (including application paperwork, details of your qualifications, references (including names and contact details of referees), requests for special arrangements, communications regarding our decisions, and relevant reports)
- Details of any medical issues and/or disabilities that you have notified to us, including any consideration and decision on reasonable adjustments made as a result
- Equality monitoring data
- Dietary requirements
- Employment records (including terms and conditions of employment, work history,

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- attendance and absence records, working hours and professional membership details)
- Financial details, including bank and building society account numbers, sort codes, BACS IDs, NI numbers, tax codes, payslips and similar data.
- Pensions membership data, including identification numbers, quotes, terms, benefits and contributions
- Performance information (including appraisals, performance improvement plans, capability procedures, performance indicators, records of review meetings, feedback, decisions and outcomes)
- Training records, including attendance, completions, accreditations and certifications
- Promotion and progression records, including applications, supporting materials, records of decisions, feedback and awards
- Details of complaints, grievances, disciplinary proceedings or investigations prompted by, involving or relating to you
- Details of any leave you have taken (including holidays; sickness; family and parental leave)
- CCTV footage
- Information obtained through electronic means such as RFID records and biometric means of identification.
- Computing and email information, including login information for our IT systems, IP address(es), equipment allocated to you and records of network access
- Photographs, audio and video recording
- Information about criminal convictions and offences
- Biometric data, as part of mandatory immigration records

Aggregated data such as statistical or demographic information may also be collected, but is not personal data as it does not directly (or indirectly) reveal your identity.

SPECIAL CATEGORY DATA

Certain personal data (known as special categories of data) is subject to additional safeguards under data protection legislation. Such information includes details of

- your racial or ethnic origin;
- your political opinions;
- your religious beliefs or other beliefs of a similar nature;
- whether you are a member of a trade union;
- your physical or mental health or condition;
- your sexual life;
- the commission or alleged commission by you of any offence, or
- any proceedings for any offence committed or alleged to have been committed by you, the disposal of such proceedings or the sentence of any court in such proceedings.

It may be necessary for us to process such personal data in order to comply with legal or regulatory obligations (including making reasonable adjustments for customers with disabilities), because it is in the public interests, or if we need to do so in order to seek confidential legal advice, or establish or defend legal claims. In some cases we will process it on the basis that we have your consent to do so.

HOW DATA IS COLLECTED

Apart from personal data that you provide to us directly, we may also process data about you from a range of sources. These include:

- Data that we generate about you, such as when processing your application, arranging

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- payments, and/or in relation to other internal processes;
- Your colleagues, friends, family, customers of the Percussion Play and other contacts
- People appointed to act on your behalf
- Your previous educational establishments and/or employers if they provide references to us
- Background check providers
- Credit reference agencies

HOW WE USE YOUR PERSONAL DATA (OUR LEGAL BASIS)

We must have a legal basis to process your personal data. The legal basis applicable to processing by Percussion Play will usually be one of the following:

- To allow us to take actions that are necessary for us to perform or enter into our contract with you (for example, to pay you your wages);
- To allow us to meet our legal obligations (for example, to fulfil our employer duties under immigration law);
- To protect our legitimate interests (for example, to understand our employee’s needs and wishes, or to protect company property); or
- We have your consent to use your information (for example to maintain a record of your next of kin details). To the extent that any processing is based on consent, you have the right to withdraw that consent at any time.
- The table below sets our main uses for personal data and the legal bases for doing so. Where our legal basis is a legitimate interest, those interests are also referenced:

Purpose for which data is processed	Legal basis for that processing
To make decisions about your recruitment, appointment, continued employment and/or exit from the business, including determining any applicable contractual terms.	It is necessary to take steps to enter into an agreement with you.
To check your right to work status and meet immigration and employment law requirements.	It is required by law.
To administer the financial aspects of your employment, including paying you, deducting tax and National Insurance contributions, liaising with your pension provider, and engaging in business management and planning (e.g. accounting and auditing tasks).	It is necessary to carry out our agreement with you. It is required by law. It is in our legitimate interests to run our business effectively, resulting in satisfied employees and minimal disruption to our operations.
To manage and administer the wider terms of your contract with us, including conducting performance reviews, managing performance, recording and assessing your development, making decisions regarding salary reviews and promotions, and complying with health and safety obligations.	It is necessary to carry out our agreement with you. It is required by law. It is in our legitimate interests to run our business effectively, resulting in satisfied employees and minimal disruption to our operations.

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<p>To meet legal obligations regarding Health & Safety, and to reduce potential for fraud and other unlawful behaviours.</p>	<p>It is necessary to carry out our agreement with you.</p> <p>It is required by law.</p> <p>It is in our legitimate interests to run our business effectively, resulting in satisfied employees and minimal disruption to our operations.</p>
<p>To investigate, follow and evidence company process in relation to grievances, disciplinary proceedings or investigations prompted by, involving or relating to you.</p>	<p>It is necessary to carry out our agreement with you.</p> <p>It is required by law.</p> <p>It is in our legitimate interests to run our business effectively, resulting in satisfied employees and minimal disruption to our operations.</p>
<p>To monitor your use of our information and communication systems to ensure compliance with our IT policies.</p> <p>Ensuring network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.</p>	<p>It is necessary to carry out our agreement or to take steps to enter into an agreement with you.</p> <p>It is in our legitimate interests to maintain systems security and ensure that our employees do not take actions which expose the business to legal risk.</p>
<p>To conduct workforce analysis to review and better understand employee retention and attrition rates.</p>	<p>It is in our legitimate interests to understand our workforce and their needs, in order to reduce turnover and maximise continuity.</p>
<p>To engage with complaints and possible legal disputes involving you, or other employees, workers and contractors.</p>	<p>It is required by law.</p> <p>It is in our legitimate interests to run our business effectively.</p>
<p>To enable a merger, acquisition, change of control, joint venture or other similar arrangement involving our business.</p>	<p>It is in our legitimate interests to protect our business interests and conduct changes to our structure and ownership, including by sharing employee data with prospective purchasers and investors, professional advisers and other stakeholders.</p>

To the extent that we process special categories of data, relevant purposes include:

Purpose for which data is processed	Legal basis for that processing
<p>To check fitness to work and manage sickness absences.</p>	<p>It is necessary to carry out our obligations and exercising our rights in the field of employment.</p> <p>It is necessary for the establishment, exercise or defence of legal claims.</p>

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	<p>It is necessary in the public interest.</p> <p>It is necessary for medical purposes, including occupational medicine and the assessment of the working capacity of an employee.</p>
<p>To conduct workforce analysis to ensure equal opportunities compliance.</p>	<p>It is required by law.</p> <p>It is necessary for the establishment, exercise or defence of legal claims.</p> <p>It is necessary in the public interest.</p>
<p>To keep to laws and regulations that apply to us, and to co-operate with regulators and law enforcement organisations.</p>	<p>It is necessary in the public interest.</p>

If you decide not to supply personal data that we have requested and as a result we are unable to comply with legal or regulatory obligations, then we may be unable to enter into a contract with you or continue communicating with you. For example, a failure to provide copies of your passport, right to work and visa information, may mean that we are unable to enter into, or continue, with your employment.

Some data that you give to us is provided on a wholly voluntary basis – you have a choice whether to do so. However, once it has been provided, we do not process it on the basis of consent, but due to legal and other obligations. Examples include:

- Equality monitoring data, which is requested by us as part of the equality monitoring that we undertake pursuant to our legal obligations under the Equality Act 2010.
- Disability and health condition information, which you may choose to provide to us in order that we can take this information into account when considering whether to make a reasonable adjustment.

SHARING YOUR PERSONAL DATA

Your personal data may be seen or used by our staff in the course of their duties, or others lawfully working with us in the ordinary course of our business.

We may share your personal information with third parties if required by law or where we have a legitimate interest in doing so.

Recipients of your data may include former employers whom we obtain references from, organisations who carry out employment background checks, and any regulatory bodies where enhanced checks are required.

We may need to share your data with appropriate third parties, for example professional advisers, auditors, contractual counterparties in order to fulfil our legal obligations. We may share your personal data with independent third-party service providers with whom you ask us to share information.

We may also need to share your data with your advisers (such as accountants, lawyers and other professional advisers) who you have authorised to represent you, or any other person you have told us is authorised to give instructions on your behalf (such as under a power of attorney).

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We may also outsource our support services or engage consultants and others to support us in our business (e.g. secretarial, marketing, courier or IT tasks). Where we do so, relevant personal data is be provided to and processed by the service provider in accordance with the terms of our contract with them and to the extent appropriate for the performance of that contract. They will not share your personal information with any organisation apart from us, unless required to by law. All personal data will be held securely and only retained for the period we instruct.

We might need to share or transfer your data confidentially with relevant parties and/or their professional advisers if there is a merger, acquisition, change of control, joint venture or other similar arrangement involving Percussion Play.

We may need to share your personal information to obtain necessary confidential legal advice. We may also need to share your personal data with organisations such as insurers, government and law enforcement agencies or HMRC, to comply with insurance, legal, taxation, public interest or similar obligations.

CHANGE OF PURPOSE

We will only use your personal data 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 data for an unrelated purpose, we will explain to you the legal basis which allows us to do so.

TRANSFER OF YOUR DATA TO OTHER COUNTRIES

In the course of carrying out the activities referred to above we may transfer your data to other countries, which may not have the same legal protections for your data as the UK.

Where data is being transferred outside of the UK and/or European Economic Area, we will take steps to ensure that your data is adequately protected in accordance with UK legal requirements and the EU GDPR (as applicable).

Otherwise, we may transfer your data if it is necessary for performance of our contractual duties to you, or because we have other legal obligations to transfer the data, or it is necessary for important reasons of public interest. If you require further detail about the protections in connection with any particular transfer, contact the Data Privacy Manager (see CONTACT).

DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purpose for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements. Data relating to unsuccessful applications is retained for up to 1 year. Data relating to successful applicants is usually held for the duration of your employment plus 6 years.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data. We also consider the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means.

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We may be obliged to suspend any scheduled destruction or deletion of personal data where legal or regulatory proceedings require it or where proceedings are underway such as require the data to be retained until those proceedings have finished.

DATA SUBJECT RIGHTS

Under the Data Protection Regulations, Data Subjects have the following rights:

- Access to personal data
- Rectification of incorrect data
- Erasure of time elapsed data
- Restriction of processing under certain circumstances
- To object to certain processing of data
- To data portability
- To complain to a supervisory authority – in the UK this is the UK Information Commissioner
- To withdraw consent

Some of these rights are not automatic, and we reserve the right to discuss with you why we might not comply with a request from you to exercise them.

To request access to your data or to exercise any of your rights, please contact the the Data Privacy Manager (see CONTACT), preferably in writing. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights).

If you have any questions about this privacy notice, the practices of our website or your dealings with this web site, please contact the Data Privacy Manager (see CONTACT).

CONTACT

Data Privacy Manager

Email address: privacy@percussionplay.com

Postal address: Percussion Play Ltd, Unit 501 Dunsbury Park, Brooklime Way, Havant, Hampshire PO9 4FF.

Telephone number: +44 1730 235180

COMPLAINTS

If you have any concerns regarding our use of your personal data, please contact the Data Privacy Manager in the first instance to allow us to address your concerns.

You have the right to make a complaint to the ICO if you are unhappy with how we have used your data or how we have addressed your concerns:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

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Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

CHANGES TO THIS NOTICE Percussion Play Limited reserves the right to update this privacy notice at any time, and we will publish a new privacy notice when we make any substantial updates. We may also notify you by alternative means, periodically, about the processing of your personal information.

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