

Personal Data Processing Activities and Time Limits of Data Storage

Data Protection Officer: Chloe Leyland

| Category of personal data (1) | Purposes of processing (2) | Category of data subject (3) | Category of recipients to whom the data has been or will be disclosed) (4) ¹ | Information about transfers to third countries or to international organisations (5) ² | Envisaged time limits for erasure of the data (6) | Where possible, a general description of the technical and organisational security measures adopted (7) | Legal basis for processing (8) | Legal basis for processing special categories of personal data or data on criminal convictions and offences (9) |
|---|--|--|---|---|---|---|---|---|
| 1. Personal information and contact details, including name, address, telephone numbers, personal e-mail address, date of birth, gender and emergency contact details | <p>For HR, personnel management and business administration purposes</p> <p>To enable the business to maintain accurate employee records and contact details</p> | <p>Job applicants</p> <p>Current employees</p> <p>Former employees</p> | <p>Professional advisors, e.g. accountants and auditors</p> <p>The client to whom the job applicant or current employee is assigned to work or could potentially work.</p> <p>3rd party data processing HR Support team based in Mauritius for the purpose of conducting reference and background checks and general HR Support.</p> <p>3rd party Applicant Tracking System data processing platform. Data stored in the USA. For the purpose of job applications.</p> <p>3rd party chatbot system. Data stored in the USA. For the purpose of job applications and queries.</p> | <p>3rd party processing HR Support team based in Mauritius. Specific contracts are in place with each processor, full training has been provided, all personal data information accessed is password protected and housed on a UK cloud system. No hard copies of information are created or housed outside the UK Head Office. No details saved on personal computers housed outside the UK.</p> <p>3rd party Applicant Tracking System data processor based in the USA. Specific controller to processor data protection agreements agreed to ensure security of personal data in compliance with strict GDPR regulations. Also Privacy Shield protected. Candidate/employee must</p> | <p>Unsuccessful job applicants: one year after the end of the recruitment exercise</p> <p>Current employees: not erased.</p> <p>Former employees: one year after the end of their employment, subject to any minimum statutory requirements for particular records.</p> | <p>Manual data held in locked office. Only Head Office Management Team has access to this.</p> <p>Electronic data held on local network. No other access can be gained externally. UK Server held in a secure locked cupboard within Head Office. Only the management team has access to this.</p> <p>Personal data sent to clients is sent only to specific authorised Client Managers. Deletion of information agreements in place. Where possible other information required by the client is attached to a Share Point with strict access.</p> <p>There is a Specific Data Breach Policy & Response Plan.</p> | <p>Necessary for the performance of the employment contract (or to take steps to enter into an employment contract)</p> <p>Necessary for compliance with a legal obligation</p> <p>Necessary for the legitimate interests of the business</p> | |

¹ including recipients in third countries or international organisations

² including details of appropriate safeguards in place

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|-------------------------------|----------------------------|------------------------------|---|--|---|--|--------------------------------|---|
| | | | <p>3rd party referencing data processor for the purpose of references and background checks. Data stored in in UK.</p> <p>3rd party psychometric profiling processor. Data stored in France. For the purpose of recruitment.</p> <p>3rd party video interview platform. Data stored in France. For the purpose of the recruitment process.</p> <p>3rd part client relations management system. Data stored in USA. For the purpose of sales and marketing and storing customer details.</p> | <p>accept 3rd party privacy policy and T&C's before entering data.</p> <p>3rd party chatbot data processor based in the USA. Specific controller to processor data protection agreements agreed to ensure security of personal data in compliance with strict GDPR regulations. Also Privacy Shield protected. Candidate/ employee must accept 3rd party privacy policy and T&C's before entering data.</p> <p>3rd party psychometric profiling processor. Data stored in France. For the purpose of recruitment. Specific controller to processor data protection agreements in place to ensure security of personal data in compliance with strict GDPR regulations. Password protected for user access. Candidates must accept 3rd party privacy policy before continuing.</p> <p>3rd party video interview platform. Data stored in France. For the purpose of the</p> | | <p>All computers which have access to information are password protected.</p> <p>Specific controller to processor data protection agreements for UK storage in place to ensure security of personal data in compliance with strict GDPR regulations.</p> <p>Specific controller to processor data protection agreements for third country storage in place to ensure security of personal data in compliance with strict GDPR regulations.</p> <p>GDPR training is part of all Monarch Personnel's management teams development and induction. 3rd party HR Support processors will receive training as well.</p> | | |

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|-------------------------------|--|--|---|--|--|---|---|---|--|
| | | | | <p>recruitment process. Specific controller to processor data protection agreements in place to ensure security of personal data in compliance with strict GDPR regulations. Password protected for user access. Candidates must accept 3rd party privacy policy before continuing.</p> <p>3rd party Client Relations Management system data processor based in the USA. Specific controller to processor data protection agreements agreed to ensure security of personal data in compliance with strict GDPR regulations. Also Privacy Shield protected.</p> | | | | | |
| 2. | <p>Recruitment records, including CVs, application forms, interview notes, references, proof of right to work in the UK, licence checks, qualification certificates, other background checks, psychometric profiles, recorded video interviews and specific completed tests.</p> | <p>For HR, personnel management and business administration purposes</p> <p>To assess the suitability of job applicants for employment</p> <p>To comply with legislative and/or regulatory requirements</p> <p>For defence against</p> | <p>Job applicants</p> <p>Current employees</p> <p>Former employees</p> | <p>3rd party processors HR Support team based in Mauritius for the purpose of conducting reference and background checks and general HR Support.</p> <p>Professional advisors, e.g. accountants and auditors</p> <p>The client to whom</p> | <p>3rd party processing HR Support team based in Mauritius. Specific contracts are in place with each processor, full training has been provided, all personal data information accessed is password protected and housed on a UK cloud system. No hard copies of information are created or housed</p> | <p>Unsuccessful job applicants: one year after the end of the recruitment exercise</p> <p>Current employees: not erased</p> <p>Former employees: one year after the end of their employment, subject to any minimum statutory requirements for par-</p> | <p>Manual data held in locked office. Only Head Office Management Team has access to this.</p> <p>Electronic data held on local network. No other access can be gained externally. UK Server held in a secure locked cupboard within Head Office. Only the management</p> | <p>Necessary for the performance of the employment contract (or to take steps to enter into an employment contract)</p> <p>Necessary for compliance with a legal obligation</p> <p>Necessary for the legitimate interests of the business</p> | |

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| | possible legal claims | | <p>the job applicant or current employee is assigned to work or potential assignments that could be completed.</p> <p>3rd party applicant tracking system data processing platform. Data stored in the USA for the purpose of the recruitment process.</p> <p>3rd party video interview platform. Data stored in France. For the purpose of the recruitment process.</p> <p>3rd party referencing data processor for the purpose of references and background checks. Data stored in Germany.</p> <p>3rd party psychometric profiling processor. Data stored in France. For the purpose of recruitment.</p> <p>3rd party licence checks platform for the purpose of background checks. Data stored in UK.</p> | <p>outside the UK Head Office. No details saved on personal computers housed outside the UK.</p> <p>3rd party Applicant Tracking System data processor based in the USA. Specific controller to processor data protection agreements agreed to ensure security of personal data in compliance with strict GDPR regulations. Candidate/employee must accept 3rd party privacy policy and T&C's before entering data.</p> <p>3rd party psychometric profiling processor. Data stored in France. For the purpose of recruitment. Specific controller to processor data protection agreements in place to ensure security of personal data in compliance with strict GDPR regulations. Password protected for user access. Candidates must accept 3rd party privacy policy before continuing.</p> <p>3rd party video interview platform. Data stored in France. For</p> | ticular records. | <p>team has access to this.</p> <p>Personal data sent to clients is sent only to specific authorised Client Managers. Deletion of information agreements in place. Where possible other information required by the client is attached to a Share Point with strict access.</p> <p>There is a Specific Data Breach Policy & Response Plan.</p> <p>All computers which have access to information are password protected.</p> <p>Specific controller to processor data protection agreements for UK storage in place to ensure security of personal data in compliance with strict GDPR regulations.</p> <p>Specific controller to processor data protection agreements for third country storage in place to ensure security of personal data in compliance with strict GDPR regulations.</p> | | |

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| | | | | <p>the purpose of the recruitment process. Specific controller to processor data protection agreements in place to ensure security of personal data in compliance with strict GDPR regulations. Password protected for user access. Candidates must accept 3rd party privacy policy before continuing.</p> <p>3rd party reference processor. Data stored in Germany. For the purpose of recruitment. Specific controller to processor data protection agreements in place to ensure security of personal data in compliance with strict GDPR regulations. Password protected for user access. Candidates must accept 3rd party privacy policy before continuing.</p> | | <p>GDPR training is part of all Monarch Personnel's management teams development and induction. 3rd party HR Support processors will receive training as well</p> | | |
| 3. | <p>Recruitment records containing special categories of personal data and/or data on criminal convictions and offences, including criminal record checks and health</p> <p>For HR, personnel management and business administration purposes</p> <p>To assess the suitability of job applicants for employment</p> | <p>Job applicants</p> <p>Current employees</p> <p>Former employees</p> | <p>3rd party processing HR Support team based in Mauritius for the purpose of conducting reference and background checks and general HR Support.</p> | <p>3rd party processing HR Support team based in Mauritius. Specific contracts are in place with each processor, full training has been provided, all personal data infor-</p> | <p>Unsuccessful job applicants: one year after the end of the recruitment exercise</p> <p>Current employees: not erased.</p> | <p>Manual data held in locked office. Only Head Office Management Team has access to this.</p> <p>Electronic data held on local network. No</p> | | <p>Necessary to perform or exercise obligations or rights under employment law</p> <p>Special categories of personal data and data on criminal con-</p> |

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| information | <p>To comply with legislative and/or regulatory requirements</p> <p>To comply with the duty to make reasonable adjustments for disabled applicants and employees</p> <p>For defence against possible legal claims</p> | | <p>Professional advisors, e.g. accountants and auditors</p> <p>The client to whom the job applicant or current employee is assigned to work.</p> <p>3rd party Applicant Tracking System data processing platform. Data stored in the USA for the purpose of recruitment.</p> | <p>mation accessed is password protected and housed on a UK cloud system. No hard copies of information are created or housed outside the UK Head Office. No details saved on personal computers housed outside the UK.</p> <p>3rd party Applicant Tracking System data processor based in the USA. Specific controller to processor data protection agreements agreed to ensure security of personal data in compliance with strict GDPR regulations. Must accept 3rd party privacy policy and T&C's before entering data.</p> | Former employees: one year after the end of their employment, subject to any minimum statutory requirements for particular records | <p>other access can be gained externally. UK Server held in a secure locked cupboard within Head Office. Only the management team has access to this.</p> <p>Personal data sent to clients is sent only to specific authorised Client Managers. Deletion of information agreements in place. Where possible other information required by the client is attached to a Share Point with strict access.</p> <p>There is a Specific Data Breach Policy & Response Plan.</p> <p>All computers which have access to information are password protected.</p> <p>Specific controller to processor data protection agreements for UK storage in place to ensure security of personal data in compliance with strict GDPR regulations.</p> <p>Specific controller to processor data protection agreements</p> | | <p>victions and offences are retained and erased in accordance with our policy document covering this</p> |

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| | | | | | | <p>for third country storage in place to ensure security of personal data in compliance with strict GDPR regulations.</p> <p>GDPR training is part of all Monarch Personnel's management teams development and induction. 3rd party HR Support processors will receive training as well.</p> | | | |
| 4. | <p>Job offer letters, employment contracts, written statements of employment terms, pay review and bonus letters, statements of changes to employment terms and related correspondence</p> | <p>For HR, personnel management and business administration purposes</p> <p>To maintain an accurate record of employment terms and to ensure compliance with employees' statutory and contractual rights</p> <p>For defence against possible legal claims</p> | <p>Current employees</p> <p>Former employees</p> | <p>3rd party processing HR Support team based in Mauritius for the purpose of conducting reference and background checks and general HR Support.</p> <p>Professional advisors, e.g. accountants and auditors</p> <p>The client to whom the job applicant or current employee is assigned to work.</p> <p>3rd party e-signature platform for the purpose of sending and tracking signature processes for documentation that requires signature. Data stored in Ireland.</p> | <p>3rd party processing HR Support team based in Mauritius. Specific contracts are in place with each processor, full training has been provided, all personal data information accessed is password protected and housed on a UK cloud system. No hard copies of information are created or housed outside the UK Head Office. No details saved on personal computers housed outside the UK.</p> | <p>Current employees: not erased</p> <p>Former employees: one year after the end of their employment, subject to any minimum statutory requirements for particular records.</p> | <p>Manual data held in locked office. Only Head Office Management Team has access to this.</p> <p>Electronic data held on local network. No other access can be gained externally. UK Server held in a secure locked cupboard within Head Office. Only the management team has access to this.</p> <p>Personal data sent to clients is sent only to specific authorised Client Managers. Deletion of information agreements in place. Where possible other information required by the client is attached to a Share</p> | <p>Necessary for the performance of the employment contract (or to take steps to enter into an employment contract)</p> <p>Necessary for compliance with a legal obligation</p> <p>Necessary for the legitimate interests of the business</p> | |

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| | | | | | | <p>Point with strict access.</p> <p>There is a Specific Data Breach Policy & Response Plan.</p> <p>All computers which have access to information are password protected.</p> <p>Specific controller to processor data protection agreements for UK storage in place to ensure security of personal data in compliance with strict GDPR regulations.</p> <p>GDPR training is part of all Monarch Personnel's management teams development and induction. 3rd party HR Support processors will receive training as well.</p> | | | |
| 5. | <p>Financial, payroll and tax information, including salary, time-sheets, benefits, pension, bank account details, tax codes and NI numbers</p> | <p>For HR, personnel management and business administration purposes</p> <p>To ensure employees are paid correctly and receive the correct benefits</p> <p>To ensure compliance with income tax requirements</p> | <p>Current employees</p> <p>Former employees</p> | <p>3rd party processing HR Support team based in Mauritius for the purpose of general HR support administration.</p> <p>Professional advisors, e.g. accountants and auditors</p> <p>3rd party payroll and invoicing software.</p> | <p>3rd party processing HR Support team based in Mauritius. Specific contracts are in place with each processor, full training has been provided, all personal data information accessed is password protected and housed on a UK cloud system. No hard copies of information</p> | <p>Current employees: not erased</p> <p>Former employees: up to seven year after the end of their employment, subject to any minimum statutory requirements for particular records</p> | <p>Manual data held in locked office. Only Head Office Management Team has access to this.</p> <p>Electronic data held on local network. No other access can be gained externally. UK Server held in a secure locked cupboard within Head</p> | <p>Necessary for the performance of the employment contract (or to take steps to enter into an employment contract)</p> <p>Necessary for compliance with a legal obligation</p> | |

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| | <p>For defence against possible legal claims</p> <p>To ensure compliance with WTD requirements</p> | | <p>Data stored in UK. For the purpose of payroll for employees.</p> <p>3rd party pension scheme provider. Data stored in UK. For the purpose of pension contribution by employee and employer.</p> <p>3rd party employee attendance timesheet clocking in/out platform. Data stored in the USA . For purpose of timesheets for payroll.</p> <p>3rd party e-signature platform for the purpose of sending and tracking signature processes for documentation that requires signature. Data stored in Ireland.</p> | <p>are created or housed outside the UK Head Office. No details saved on personal computers housed outside the UK.</p> <p>3rd party employee attendance timesheet clocking in/out software platform - data processor based in the USA. Specific controller to processor data protection agreements agreed to ensure security of personal data in compliance with strict GDPR regulations. Employee must accept 3rd party privacy policy and T&C's before downloading.</p> <p>3rd party e-signature platform for the purpose of sending and tracking signature processes for documentation that requires signature. Data stored in Ireland. Specific controller to processor data protection agreements agreed to ensure security of personal data in compliance with strict GDPR regulations. Password protected access.</p> | | <p>Office. Only the management team has access to this.</p> <p>Personal data sent to clients is password protected to specific Client Managers. Deletion of information agreements in place. Other information required by the client is attached to a Share Point which is strongly password protected.</p> <p>There is a Specific Data Breach Policy & Response Plan.</p> <p>All computers which have access to information are password protected.</p> <p>Specific controller to processor data protection agreements for UK storage in place to ensure security of personal data in compliance with strict GDPR regulations.</p> <p>Specific controller to processor data protection agreements for third country storage in place to ensure security of personal data in compliance with strict</p> | | |

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| | | | | | | <p>GDPR regulations.</p> <p>GDPR training is part of all Monarch Personnel’s management teams development and induction. 3rd party HR Support processors will receive training as well.</p> | | |
| 6. | <p>Disciplinary, grievance and capability records, including investigation reports, collated evidence, minutes of hearings and appeal hearings, warnings, performance improvement plans and related correspondence</p> <p>For HR, personnel management and business administration purposes</p> <p>To maintain a record of disciplinary, grievance and capability procedures and action taken</p> <p>For defence against possible legal claims</p> | <p>Current employees</p> <p>Former employees</p> | <p>3rd party processing HR Support team based in Mauritius for the purpose general HR support administration.</p> <p>Professional advisors, e.g. accountants and auditors</p> <p>The client to whom the job applicant or current employee is assigned to work.</p> <p>3rd party e-signature platform for the purpose of sending and tracking signature processes for documentation that requires signature. Data stored in Ireland.</p> | <p>3rd party processing HR Support team based in Mauritius. Specific contracts are in place with each processor, full training has been provided, all personal data information accessed is password protected and housed on a UK cloud system. No hard copies of information are created or housed outside the UK Head Office. No details saved on personal computers housed outside the UK.</p> | <p>Until the expiry of any warning given, but a summary disciplinary, grievance or performance management record will still be maintained as follows:</p> <p>Current employees: not erased.</p> <p>Former employees: one year after the end of their employment</p> | <p>Manual data held in locked office. Only Head Office Management Team has access to this.</p> <p>Electronic data held on local network. No other access can be gained externally. UK Server held in a secure locked cupboard within Head Office. Only the management team has access to this.</p> <p>Personal data sent to clients is sent only to specific authorised Client Managers. Deletion of information agreements in place. Where possible other information required by the client is attached to a Share Point with strict access.</p> <p>There is a Specific Data Breach Policy &</p> | <p>Necessary for compliance with a legal obligation</p> <p>Necessary for the legitimate interests of the business</p> | |

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| | | | | | | <p>Response Plan.</p> <p>All computers which have access to information are password protected.</p> <p>Specific controller to processor data protection agreements for UK storage in place to ensure security of personal data in compliance with strict GDPR regulations.</p> <p>Specific controller to processor data protection agreements for third country storage in place to ensure security of personal data in compliance with strict GDPR regulations.</p> <p>GDPR training is part of all Monarch Personnel's management teams development and induction. 3rd party HR Support processors will receive training as well.</p> | | |
| 7. | <p>Appraisals, including appraisal forms, performance reviews and ratings, targets and objectives set</p> <p>For HR, personnel management and business administration purposes</p> <p>To maintain a record of performance man-</p> | <p>Current employees</p> <p>Former employees</p> | <p>3rd party processing HR Support team based in Mauritius for the purpose general HR support administration.</p> | <p>3rd party processing HR Support team based in Mauritius. Specific contracts are in place with each processor, full training has been provided, all</p> | <p>Current employees: not erased.</p> <p>Former employees: one year after the end of their employment</p> | <p>Manual data held in locked office. Only Head Office Management Team has access to this.</p> <p>Electronic data held</p> | <p>Necessary for the performance of the employment contract (or to take steps to enter into an employment contract)</p> | |

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| | <p>agement systems</p> <p>To record and assess education, training and development activities and needs</p> <p>For the management, planning and organisation of work</p> <p>For defence against possible legal claims</p> | | <p>Professional advisors, e.g. accountants and auditors</p> <p>The client to whom the job applicant or current employee is assigned to work.</p> <p>3rd party e-signature platform for the purpose of sending and tracking signature processes for documentation that requires signature. Data stored in Ireland.</p> | <p>personal data information accessed is password protected and housed on a UK cloud system. No hard copies of information are created or housed outside the UK Head Office. No details saved on personal computers housed outside the UK.</p> | | <p>on local network. No other access can be gained externally. UK Server held in a secure locked cupboard within Head Office. Only the management team has access to this.</p> <p>Personal data sent to clients is password protected to specific Client Managers. Deletion of information agreements in place. Other information required by the client is attached to a Share Point which is strongly password protected.</p> <p>There is a Specific Data Breach Policy & Response Plan.</p> <p>All computers which have access to information are password protected.</p> <p>Specific controller to processor agreements in place to ensure security of personal data.</p> <p>GDPR training is part of all Monarch Personnel's management teams development and induction. 3rd party HR Support</p> | <p>Necessary for compliance with a legal obligation</p> <p>Necessary for the legitimate interests of the business</p> | |

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|-------------------------------|--|--|---|---|---|---|---|---|
| | | | | | | processors will receive training as well. | | |
| 8. | <p>Annual leave, other leave and sickness absence records, including details of the types of and reasons for leave or absence being taken and related correspondence</p> <p>To maintain a record of the operation of annual leave procedures</p> <p>To maintain a record of the operation of sickness absence procedures</p> <p>To maintain a record of maternity leave, paternity leave, adoption leave, shared parental leave, parental leave and any other type of paid or unpaid leave or time off work</p> <p>To ensure payment of SSP or contractual sick pay</p> <p>To ensure payments of other statutory or contractual pay entitlements, e.g. SMP, SPP, SAP and ShPP</p> <p>To comply with the duty to make reasonable adjustments for disabled employees</p> <p>To meet health and</p> | <p>Current employees</p> <p>Former employees</p> | <p>3rd party processing HR Support team based in Mauritius for the purpose general HR support administration.</p> <p>Professional advisors, e.g. accountants and auditors</p> <p>The client to whom the job applicant or current employee is assigned to work.</p> <p>3rd party employee attendance timesheet clocking in/out platform. Data stored in the USA . For purpose of timesheets for payroll.</p> <p>3rd party payroll and invoicing software. Data stored in EEA. For the purpose of payroll for employees.</p> | <p>3rd party processing HR Support team based in Mauritius. Specific contracts are in place with each processor, full training has been provided, all personal data information accessed is password protected and housed on a UK cloud system. No hard copies of information are created or housed outside the UK Head Office. No details saved on personal computers housed outside the UK.</p> <p>3rd party employee attendance timesheet clocking in/out software platform - data processor based in the USA. Specific controller to processor data protection agreements in place to ensure security of personal data in compliance with strict GDPR regulations. Employee must accept 3rd party privacy policy and T&C's before downloading.</p> | <p>Current employees: not erased.</p> <p>Former employees: one year after the end of their employment, subject to any minimum statutory requirements for particular records which would be up to a maximum for 7 years.</p> | <p>Manual data held in locked office. Only Head Office Management Team has access to this.</p> <p>Electronic data held on local network. No other access can be gained externally. UK Server held in a secure locked cupboard within Head Office. Only the management team has access to this.</p> <p>Personal data sent to clients is password protected to specific Client Managers. Deletion of information agreements in place. Other information required by the client is attached to a Share Point which is strongly password protected.</p> <p>There is a Specific Data Breach Policy & Response Plan.</p> <p>All computers which have access to information are password protected.</p> <p>GDPR training is part of all Monarch Per-</p> | <p>Necessary for the performance of the employment contract (or to take steps to enter into an employment contract)</p> <p>Necessary for compliance with a legal obligation</p> <p>Necessary for the legitimate interests of the business</p> | |

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| Category of personal data (1) | Purposes of processing (2) | Category of data subject (3) | Category of recipients to whom the data has been or will be disclosed) (4) ² | Information about transfers to third countries or to international organisations (5) ² | Envisaged time limits for erasure of the data (6) | Where possible, a general description of the technical and organisational security measures adopted (7) | Legal basis for processing (8) | Legal basis for processing special categories of personal data or data on criminal convictions and offences (9) |
|-------------------------------|--|---|---|---|--|---|---|---|
| | <p>safety obligations.</p> <p>For defence against possible legal claims</p> <p>To ensure compliance with WTD requirements</p> | | | | | sonnel’s management teams development and induction. 3 rd party HR Support processors will receive training as well. | | |
| 9. | <p>Annual leave, other leave and sickness absence records containing special categories of personal data, including information about medical conditions, medical reports, reasons for sickness absence, reasonable adjustments and related correspondence</p> | <p>For HR, personnel management and business administration purposes</p> <p>To maintain a record of the operation of annual leave procedures</p> <p>To maintain a record of the operation of sickness absence procedures</p> <p>To maintain a record of maternity leave, paternity leave, adoption leave, shared parental leave, parental leave and any other type of paid or unpaid leave or time off work</p> <p>To ensure payment of SSP or contractual sick pay</p> <p>To ensure payments of other statutory or contractual pay entitlements, e.g. SMP, SPP, SAP and ShPP</p> | <p>Current employees</p> <p>Former employees</p> | <p>3rd party processing HR Support team based in Mauritius for the purpose general HR support administration.</p> <p>Professional advisors, e.g. accountants and auditors</p> <p>The client to whom the job applicant or current employee is assigned to work.</p> <p>3rd party employee attendance timesheet clocking in/out software. Data stored in the USA . For purpose of timesheets for payroll.</p> <p>3rd party payroll platform. Data stored in UK. For the purpose of payroll for employees.</p> <p>3rd party e-signature platform for the purpose of sending and tracking signature</p> | <p>3rd party processing HR Support team based in Mauritius. Specific contracts are in place with each processor, full training has been provided, all personal data information accessed is password protected and housed on a UK cloud system. No hard copies of information are created or housed outside the UK Head Office. No details saved on personal computers housed outside the UK.</p> <p>3rd party employee attendance timesheet clocking in/out software platform - data processor based in the USA. Specific controller to processor data protection agreements in place to ensure security of personal data in compliance with strict GDPR regulations. Employee must accept 3rd party privacy</p> | <p>Current employees: not erased.</p> <p>Former employees: one year after the end of their employment, subject to any minimum statutory requirements for particular records which would be up to a maximum for 7 years.</p> | <p>Manual data held in locked office. Only Head Office Management Team has access to this.</p> <p>Electronic data held on local network. No other access can be gained externally. UK Server held in a secure locked cupboard within Head Office. Only the management team has access to this.</p> <p>Personal data sent to clients is password protected to specific Client Managers. Deletion of information agreements in place. Other information required by the client is attached to a Share Point which is strongly password protected.</p> <p>There is a Specific Data Breach Policy & Response Plan.</p> <p>All computers which</p> | <p>Necessary to perform or exercise obligations or rights under employment law or social security law</p> <p>Special categories of personal data are retained and erased in accordance with our policy document covering this</p> |

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| Category of personal data (1) | Purposes of processing (2) | Category of data subject (3) | Category of recipients to whom the data has been or will be disclosed) (4) ¹ | Information about transfers to third countries or to international organisations (5) ² | Envisaged time limits for erasure of the data (6) | Where possible, a general description of the technical and organisational security measures adopted (7) | Legal basis for processing (8) | Legal basis for processing special categories of personal data or data on criminal convictions and offences (9) |
|-------------------------------|--|---|---|--|--|--|--|---|
| | <p>To comply with the duty to make reasonable adjustments for disabled employees</p> <p>To meet health and safety obligations.</p> <p>For defence against possible legal claims.</p> <p>To ensure compliance with WTD requirements</p> | | processes for documentation that requires signature. Data stored in Ireland. | policy and T&C's before downloading. | | <p>have access to information are password protected.</p> <p>Specific controller to processor data protection agreements for UK storage in place to ensure security of personal data in compliance with strict GDPR regulations.</p> <p>Specific controller to processor data protection agreements for third country storage in place to ensure security of personal data in compliance with strict GDPR regulations.</p> <p>GDPR training is part of all Monarch Personnel's management teams development and induction. 3rd party HR Support processors will receive training as well.</p> | | |
| 10. | Termination of employment documentation, including resignation letters, dismissal letters, redundancy letters, minutes of meetings, settlement agreements and other related correspondence | <p>For HR, personnel management and business administration purposes</p> <p>To maintain a record of the operation of dismissal/ termination procedures</p> <p>To comply with legis-</p> | <p>Current employees</p> <p>Former employees</p> | <p>3rd party processing HR Support team based in Mauritius for the purpose general HR support administration.</p> <p>Professional advisors, e.g. accountants and auditors</p> | <p>3rd party processing HR Support team based in Mauritius. Specific contracts are in place with each processor, full training has been provided, all personal data information accessed is password protected and housed on a UK</p> | <p>Current employees: not erased.</p> <p>Former employees: one year after the end of their employment, subject to any minimum statutory requirements for particular records</p> | <p>Manual data held in locked office. Only Head Office Management Team has access to this.</p> <p>Electronic data held on local network. No other access can be gained externally. UK Server held in a</p> | <p>Necessary for the performance of the employment contract (or to take steps to enter into an employment contract)</p> <p>Necessary for compliance with a legal obligation</p> |

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| Category of personal data (1) | Purposes of processing (2) | Category of data subject (3) | Category of recipients to whom the data has been or will be disclosed) (4) ¹ | Information about transfers to third countries or to international organisations (5) ² | Envisaged time limits for erasure of the data (6) | Where possible, a general description of the technical and organisational security measures adopted (7) | Legal basis for processing (8) | Legal basis for processing special categories of personal data or data on criminal convictions and offences (9) |
|-------------------------------|--|------------------------------|---|--|---|---|---|---|
| | <p>ative requirements</p> <p>For defence against possible legal claims</p> | | <p>3rd party e-signature platform for the purpose of sending and tracking signature processes for documentation that requires signature. Data stored in Ireland.</p> | <p>cloud system. No hard copies of information are created or housed outside the UK Head Office. No details saved on personal computers housed outside the UK.</p> <p>3rd party e-signature platform for the purpose of sending and tracking signature processes for documentation that requires signature. Data stored in Ireland.</p> | | <p>secure locked cupboard within Head Office. Only the management team has access to this.</p> <p>Personal data sent to clients is sent only to specific authorised Client Managers. Deletion of information agreements in place. Where possible other information required by the client is attached to a Share Point with strict access.</p> <p>There is a Specific Data Breach Policy & Response Plan.</p> <p>All computers which have access to information are password protected.</p> <p>Specific controller to processor data protection agreements for UK storage in place to ensure security of personal data in compliance with strict GDPR regulations.</p> <p>Specific controller to processor data protection agreements for third country storage in place to</p> | <p>Necessary for the legitimate interests of the business</p> | |

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|-------------------------------|----------------------------|------------------------------|---|---|---|---|--------------------------------|---|
| | | | | | | <p>ensure security of personal data in compliance with strict GDPR regulations.</p> <p>GDPR training is part of all Monarch Personnel's management teams development and induction. 3rd party HR Support processors will receive training as well.</p> | | |