

Steller Systems' Privacy Notice to Employees, Contractors and Applicants

PRNA/426/2
16th January 2023

Introduction

Steller Systems Ltd. is committed to maintaining the accuracy, confidentiality and security of your personal information in accordance with the General Data Protection Regulations¹ and the Data Protection Act 1998. This Privacy Notice describes the personal information that Steller Systems collects from or about you, how we use it and to whom we disclose that information.

Steller Systems collects and maintains different types of personal information in respect of those individuals who seek to be, are, or have been employed by us.

Where we get your personal data

Steller Systems collects personal information directly from you and from third parties. In most circumstances where the personal information that we collect about you is held by a third party, we will obtain your permission before we seek this information from such sources. Where permitted or required by applicable law or regulatory requirements, we may collect information about you without your knowledge or consent.

How we get your personal data

Steller Systems collects data directly from applicants by means of forms, CVs, covering letters/emails, identity documents, interviews, phone calls and emails. In addition, data is collected from other sources including referees (employment and academic), qualification certificates and the Disclosure & Barring Service (DBS).

Steller Systems collects additional data directly from employees verbally and by means of forms, emails, documents, photographs and video.

What personal data we collect

Steller Systems collects the following personal data regarding applicants:

- Names;
- Mother's maiden name;
- Gender;
- Date of birth;
- Place of birth;
- Nationalities/citizenships;
- Contact details;
- Residential address history;
- Details of significant periods spent abroad;
- Employment history;
- Educational history and qualifications;
- Details of existing or previous security clearances;
- National Insurance number;
- Immigration status;
- Declaration of unspent criminal convictions;
- Criminal history provided by DBS;
- Signature;
- Any other information provided by referees;
- Any other information contained on identity documents;

¹ Regulation (EU) 2016/679. Adopted 27th April 2016, enforceable 25th May 2018.

- Any other information volunteered by applicants on their CV or during their interview, including extra-curricular activities and interests.

Steller Systems maintains the information above for employees, and collects the following additional information:

- Bank account details;
- Emergency contact information;
- Photographs and video;
- Mandatory policy acknowledgement sign-off sheets;
- Salary, expenses and benefit information, including P45;
- Any information contained on receipts for claiming expenses;
- Any health information volunteered by the employee;
- Security clearance details;
- Any other information necessary for Steller Systems' business purposes.

Why we collect your personal data

The personal information collected is used and disclosed for our business purposes and for establishing and managing your employment relationship with Steller Systems. Such uses include:

- Determining eligibility for initial employment, including the verification of references and qualifications;
- Conducting security checks prior to employment;
- Obtaining, maintaining or transferring National Security Vetting (NSV) security clearances;
- Administering pay and benefits;
- Establishing training and/or development requirements;
- Conducting performance reviews and determining performance requirements;
- Assessing qualifications for a particular job or task;
- Gathering evidence for disciplinary action, or termination;
- Establishing a contact point in the event of an emergency (such as next of kin);
- Complying with applicable laws;
- Ensuring the security of company-held information; and
- Such other purposes as are reasonably required by Steller Systems.

Who we share your data with, and why

We may share your personal information with our employees, contractors and other parties in the course of normal business, as well as for the purposes of:

- Pension administration;
- Employee payroll;
- Obtaining references;
- Security checks and NSV clearances;
- Management of IT infrastructure.

In addition, Steller Systems may share personal data required with other third parties including current or prospective customers, suppliers and partners.

Steller Systems may also share a limited amount of personal data in the public domain, such as on the company websites and marketing material, including names, qualifications, photographs, work histories, and links to other information placed in the public domain.

Upon acceptance of an offer of employment, Steller Systems will check references with former employers. This will include, but may not be limited to, points of contact provided by the applicant.

International data transfers and security

From time to time it may be necessary to transfer a limited amount of personal data outside of the EU in order to facilitate working with customers abroad.

How long we hold your data

Steller Systems will retain your data for only as long as there is a justifiable and legitimate need to do so. Specific timescales or criteria for the destruction of personal data will vary according to the type of personal data and the purpose for which it is collected.

Personal data (excluding names and contact details) regarding unsuccessful applicants shall be retained for 12 months, unless you give consent for it to be held for longer. Records of security checks undertaken shall be retained for no longer than 2 years.

In general, personal data collected from employees for the purposes of security checks and NSV clearances shall be retained for 6 months, however records of security checks undertaken shall be retained for the duration of employment.

Bank account details of employees shall be retained for 6 months after an employee has left the employment of Steller Systems, and contact details shall be retained for 12 months.

Profiling and automated decision making

Steller Systems does not use automated decision-making or profiling using personal data.

Your rights

You have the right to:

- Be informed about how your data is used;
- Access data that we hold about you;
- Rectify data held about you if it is inaccurate or incomplete;
- The deletion or removal of personal data where there is no compelling reason for its continued processing;
- Object to your data being processed on the grounds of the company's legitimate interests or the performance of a task in the public interest.

What happens if you don't provide information

Failure to provide personal data above may result in an inability for the company to employ you or fulfil our contract of employment with you.

Concerns or complaints

If you have any concerns or complaints regarding how your data will be, is or has been managed, then please contact:

Robert Skarda, Managing Director
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Nailsworth
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