

## Privacy statement for applicants, employees and when carrying out our marketing activities to prospective customers

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### 1. Introduction

- 1.1 This is the Aareon UK Limited (Aareon) Privacy Notice. Aareon is part of a group of companies with [Aareon AG](#) acting as the Parent Company who are based in Germany. This Privacy Notice describes the categories of personal identifiable information (PII) we process and for what purposes. We are committed to collecting and using data fairly and in accordance with the requirements of the UK's Data Protection Act 2018 (DPA) and the General Data Protection Regulation (GDPR).
- 1.2 We take your privacy seriously and you can find out more here about your privacy rights and how we collect, use, share and secure your PII. This includes the information we already hold about you and any further information we might collect about you, either direct from you or from a third party.
- 1.3 This Privacy Notice sets out our commitments to you as a prospective, current or former employee as well as when we process your information when carrying out our marketing operations to prospective clients. Aareon complies with the Data Protection Laws in the countries in which we operate, all being within the EU. It explains how we collect, use, store, share, retain and secure your PII.
- 1.4 Our site may, from time to time, contain links to and from the websites of our commercial partners, other regional bodies, advertisers, volunteering platform and clubs. If you follow a link to any of these websites, please note that these websites have their own privacy policies and they

will be a data controller of your personal information. We do not accept any responsibility or liability for these policies and you should check these policies before you submit any personal information to these websites.

- 1.5 In addition, if you linked to this Site from a third-party site, we cannot be responsible for the privacy policies and practices of the owners or operators of that third-party site and recommend that you check the policy of that third party site and contact its owner or operator if you have any concerns or questions.
- 1.6 This Privacy Notice is a public document available when Aareon obtain and use your PII as a data controller. On our website we have also published a second Notice which highlights how we demonstrate our compliance as a data processor, in the supply of our services and products to our clients and [partners](#).
- 1.7 This Privacy Notice will be updated when required, we recommend you keep yourself informed by reviewing this notice from time to time.
- 1.8 This Notice demonstrates how we as a data controller for our own recruitment, employee and accounting purposes.
- 1.9 The difference between a data controller and data processor is important. Aareon determines the use of individuals PII, as a prospective, current or former employee as well as when we process your information when carrying out our marketing operations. This means we are the Data Controller, when carrying out these activities.  
Aareon also carries out functions on behalf of other Data Controllers, (our clients) this means we act as their Data Processor. We carry out functions which may involve individuals PII on behalf of our clients and these processing operations are based on their instructions and under a contract.
- 1.10 As a Data Controller, we determine and process PII in regard to the following operations:
  - Visitors to our website and marketing
  - Current and former prospective employment applicants
  - Current and former employees, contractors and consultants
- 1.11 Our Data Protection Officer's details are below and you can contact them if you have questions about your data, data protection, your rights or wish to make a complaint:

**By post:**

Information Assurance Manager  
Aareon UK Limited  
Building 500  
Abbey Park  
Stareton  
Kenilworth  
CV8 2LY

**By email:**

[DP@Aareon.com](mailto:DP@Aareon.com)

**By phone:**

02476 323 723

## 2. Visitors to our website/s and marketing

- 2.1 Visitors to our website are important as we want to supply you with full access to the services, products we offer across Aareon and Aareon AG and our preferred Partners. When you visit our websites we have a full '[cookie](#)' privacy notice. It is important you read this as it supplies details of how we collect, monitor, use, share, retain and secure your PII.
- 2.2 We will obtain information from you when you request a contact / call back and/or a demonstration of one of our products and services. We have a marketing data base and only hold PII of individuals who have:
- Supplied consent to be contacted for marketing purposes
  - Requested information about our products and services
  - Supplied their contact details at events, conferences or meetings
  - Being a client of Aareon and as part of the performance of contract keep them informed on updates to existing products purchased/leased and/or new products and services on a like for like basis.
  - Being a client of Aareon we may use our legitimate interests to keep you informed of new products and services which in our opinion will be a benefit to your business.
- 2.3 Individuals can unsubscribe at any time to receiving marketing or like for like messages by telephoning 02476 323 723 or direct mail or by emailing [dp@aareon.com](mailto:dp@aareon.com). This cannot apply to clients where Aareon have to keep them informed on current product updates under the performance of a contract.

## 3. Your privacy rights

- 3.1 With the DPA and GDPR you have eight rights relating to the use and storage of your PII. A Data Controller has to comply with these rights, which are:
- The right to be informed - You have the right to be informed about the collection and use of your personal data. This is a key transparency requirement under the GDPR. We will provide you with information including: our purposes for processing your personal data, our retention periods for that personal data, and who it will be shared with.
  - The right of access – You have the right to a copy of the information we have on you.

- The right to rectification – You have the right to have inaccurate PII data rectified, or completed if it is incomplete.
- The right to erasure – You have the right to have your data erased.
- The right to restrict processing - You have the right to request the restriction or suppression of your personal data. When processing is restricted, we are permitted to store the personal data, but not use it.
- The right to data portability - The right to data portability allows you to obtain and reuse your personal data for your own purposes across different services. It allows you to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without affecting its usability.
- The right to object - You have the right to object to the processing of their personal data in certain circumstances. You do have an absolute right to stop your data being used for direct marketing.
- Rights in relation to automated decision making and profiling - The GDPR has provisions on:
  - automated individual decision-making (making a decision solely by automated means without any human involvement); and
  - profiling (automated processing of personal data to evaluate certain things about an individual). Profiling can be part of an automated decision-making process.
  - Where decisions are made solely by automated means you have the right to request a review by a human.

3.2 Aareon UK has a legal obligation to answer all requests in relation to your rights. Some of these rights are not absolute, e.g. where you are still under a contract, you will not be able to have your data erased.

3.3 You can make a complaint if you feel Aareon UK is using your personal identifiable information unlawfully and/or holding inaccurate, inadequate or irrelevant personal identifiable information which if used may have a detrimental impact on you and/or has an impact on your rights. If you wish to make a complaint, please refer your complaint to our Information Assurance Manager, their details are noted above.

3.4 You can also make a complaint to the data protection supervisory authority. In the UK, this is the Information Commissioner's Office, at <https://ico.org.uk>. You can view other supervisory authorities and details of countries where your PII is held and processed [here](#).

3.5 To make enquires for further information about exercising any of your rights in this Privacy Notice, please contact our Information Assurance Manager.

## 4. Prospective, Current and Former Employees

4.1 When you apply for a role within Aareon UK, we will ask you to supply the following information:

### Personal Information

- Contact details, (name, address, email, contact numbers)
- Education and qualifications
- Employee history
- Hobbies and/or interests
- Evidence to support your application

### Special category information

- Any adjustments that may be needed if you are called for an interview

### Other relevant information

- Convictions
- For some roles we may have to apply for a Disclosure and Barring Services – this will be highlighted on the advert.

Data will be stored in a range of different places, including in your personnel file, in the firm's HR management and payroll systems and in other IT systems (including the firm's email system).

### Law Enforcement - Other relevant information

In limited circumstances, Aareon may need to carry out applicable law enforcement checks if an offer of employment is made and if the post requires such checks as part of the employment contract. These are called Data Barring Service Checks and they are carried out with your full knowledge and consent via the applicable approved agency. This information when required will be highlighted on the advert.

### Obtaining and processing your recruitment application

We obtain your PII when you supply this information for the purposes of applying to work for Aareon. We will retain your employment applicant information for the required period of time detailed below, we will also hold and process PII for the purposes of determining if your knowledge, skills, experience and qualifications meet the role specification. Your PII will be shared with the recruitment panel and limited information where reasonable adjustments need to be made to enable the interview process to take place.

The recruitment panel will create notes of the interview and these will be processed and retained for the purposes to record the answers to the questions posed and how these answers reflected the role specification criteria. They will be further used to record the outcome of the interview process and decision. We will not share the recruitment panel of any equality information. We do not need gender information, but some applicant's detail this on their CV. Aareon will not share

this with the recruitment panel, but as part of any interview notes reference to gender 'she' / 'he' maybe be recorded by the panel.

We will not require the details of your appointed referees until an offer of employment is made. We will expect you to have informed the referees and obtained their consent to share their PII for the purposes of obtaining an employment and/or character reference.

If you are unsuccessful for the position you have applied for at the time we may wish to retain your applicant and interview records for a period of up to 12 months, on our HR 'Talent' Management system and consider your PII against any future positions that may become available. We will confirm this with you at point of application.

We will retain and process your data via a selection of approved data processors, data processors are organisation's and/or people engaged by Aareon to carryout functions on our behalf under contract and in full compliance with data protection laws.

Data will be stored in a range of different places, including in your personnel file, in the firm's HR management and payroll systems and in other IT systems (including the firm's email system.

#### 4.2 Where you are a member of staff

##### **Personal Information**

- Same as above
- References supplied by your referees
- Photograph for Identification purposes and for the promotion and advertisement of Aareon.
- Gender
- National Insurance Number
- Marital status – if you engage/entitled to join our employee benefit scheme/s
- Dependents – if you engage/entitled to join our employee benefit scheme/s
- Entitlement to work in the UK – such as copy of your passport, full birth certificate, right to work and reside in the country (Visa)
- Copy of your driving license – where the job involves driving where car allowance/company car is supplied
- Bank details to pay your salary
- Next of kin – contact in the case of an emergency, you will need to ensure you have informed this person, obtained their consent to share their information with us and pass them a copy of this privacy statement
- Details of any disciplinary or grievances you may be involved in, including any warning issued
- Assessments of your performance, including appraisals, performance reviews, ratings, performance plans and any related correspondence
- Absence, sickness, annual leave, unpaid leave and/or compassionate or educational leave
- Payroll, benefits and expenses

### **Special category information**

- Biometric data in the form of thumb print if you are presented with a company phone
- If there were any adjustments, due to a disability that may be required in the workplace to ensure your wellbeing, safety and health requirements are met while you are employed by us, whether these are permanent or temporary.
- Sick records which may include medical or health conditions
- Equality information – which may include ethnic origin, religion or other beliefs, sexual orientation

### **Other relevant information**

- Convictions – for some roles a Disclosure and Barring Service may need to be carried out, if a job role changes in that a check is necessary, you will be informed of this.
- Driving information – offences/fines picked up during your employment, to ensure your continued entitlement to receive car allowance or have access to a company car. We will also check to ensure that employees who are entitled to receive car allowance have ‘business use’ included within their car insurance. This will be carried out as part of an annual check, where the individual will complete a form signing to say that they are eligible to drive and have the correct insurance in place.

We may be required to share your PII with other third parties or agencies to comply with the law. We may not be able to obtain your consent or inform you if this would have any impact on the purposes for which the data was shared. For example, for the prevention and detection of crime or prosecution or apprehension of offenders.

The Aareon employee comprehensive privacy notice, retention and security notices will be supplied as part of the Aareon employee handbook.

#### **4.3 When you leave Aareon UK’s employment.**

Your information will be kept in line with our retention policy and schedule, which can be obtained from our Information Assurance Manager, whose details are above.

## **5. How We Gather Your Personal Identifiable Information**

5.1 We obtain PII by various means; this can be by face to face, email, telephone, correspondence and/or by receiving this information from others, for example: your referee/s. We can also receive information about you from other people who know you and/or are linked to you, for example: nominated person to act on your behalf, e.g. your next of kin giving an update on your illness.

5.2 Some further examples of how we may gather your personal identifiable information are set out below:

- from monitoring or recording calls as part of quality and complaints monitoring: we record these calls for training and to ensure the safety of our staff;
- from monitoring your use of our website;
- Time sheets;
- Expenses and
- from social media such as LinkedIn
- Employment agencies, who will be acting as our processor or joint data controller
- Health and Social care providers
- Law enforcement agencies
- Courts.

## 6. How We Lawfully Use Your Personal Information

6.1 The table below sets out the processes and the legal gateway we rely on to process the data:

Purpose / Activity	Lawful ground to process	Retention
Email or telephone enquiries about a vacancy or to go on our CV 'talent' management system	Consent	1 Month
When you submit your application	Performance of a contract	3- 12 Months
When you are invited for an interview	Performance of a contract	12 Months
When you are not invited for an interview	Performance of a contract	3 Months
To keep you informed of further job roles and retain your details for 12 months	Consent	12 Months
Offered the position	Performance of a contract	6 years after end of relationship
Health and Social Care records	Performance of a contract	6 years after end of relationship
Benefits	Performance of a contract	6 years after end of relationship
Maintain accurate up to records while you are employed, sick, annual leave, performance, etc.	Performance of a contract	6 years after end of relationship
Obtain occupational health advice	Performance of a contract	7 years
Obtain external legal advice	Legal Obligation	7 years
Ensure effective general HR and business information	Performance of a contract	6 years end of relationship



Respond to reference requests	Consent	6 years after end of relationship
Payroll / Payments	Performance of a contract	Permanently
Equality Monitoring	Legal Obligation	
Requested Marketing	Consent	24 Months or until opted-out
Client Marketing	Performance of a contract	Life of contract
Post Client Marketing	Data Controller Legitimate Interests	12 Months post contract end

We will only use your data for the propose/s it was collected, unless we have reasonably consider that we need to use it for another reason and that reason is compatible with the original reason of collecting it. If this not the case and wish to continue to use your PII for a new purpose, we will inform you and in doing so will explain the legal basis which allows us to do so.

Please note that we may process your PII without your knowledge or consent, in compliance with the above rules, where we are required or permitted by law.

## **7. How Long We keep Your PII for**

- 7.1 For applicants / contractors / consultants not invited to an interview we will only keep your PII and any other information you have provided for a period of 3 months, from the closing date of the advert.
- 7.2 For applicants / contractors / consultants invited to an interview but has not been successful we will only keep your PII and any other information you have provided for a period of 3 months, from the closing date of the interview. Unless you have indicated you want Aareon to retain your CV and interview notes on their 'talent' or 'contractor' management system. This will only be retained for 12 months from the interview.
- 7.3 For applicants / contractors / consultants invited to an interview but has not been successful we will only keep your PII and any other information you have provided for a period of 3 months, from the closing date of the interview. Unless you have indicated you want Aareon to retain your CV and interview notes on their 'talent' or 'contractor' management system. This will only be retained for 12 months from the interview.
- 7.4 For employee – your PII will be kept for as long as it is necessary to fulfill the purposes it was collected, including in satisfying any legal, accounting, or reporting requirements. The periods for which your data is held can be found, by clicking here. Please refer to the company's retention policy and schedule in the employee handbook.

## **8. Automated decision making**

- 8.1 Employment decisions are not based solely on automated decision making, if ever. Where Aareon carry out automated decision making we will inform you the point of advertisement and supply the processing conditions and lawful basis.

## **9. Who has access to your data**

- 9.1 As an applicant – your data will be kept within the HR department and with the manager who has the vacancy and normally one other manager who will be on the recruitment/interview panel.
- 9.2 As an employee – your data may be shared internally, including HR and Finance (payroll purposes), your line manager. In limited form your PII may be shared with board members and selected staff members where it necessary for the performance of their roles.
- 9.3 We may share your data with third parties in order to obtain, and provide, pre-employment references from/to other employees, obtain employment background checks from regulatory bodies and third party providers and obtain necessary criminal records checks from bodies such a Disclosure and Barring Service.
- 9.4 We also share PII with third party suppliers that process data on our/your behalf in connection with payroll, HR and in the provision of employee benefits and occupational health services.
- 9.5 Our Information Assurance Manager will be administrating individuals requests under data protection law and this includes all Rights of an individual. Therefore, this role will have access to your PII in conjunction with Human Resources for these purposes only and only until the matter is resolved.

## **10. Keeping Your PII up to date, accurate and adequate**

- 10.1 We require all individuals to keep Aareon informed of any changes to the PII, e.g. appointed next of kin and/or banking information. Aareon will complete a review of all data obtained for the purposes set out in this privacy notice to ensure it is held in line with the law and our retention policy, kept accurate, adequate and relevant for the purposes we have obtained and processed the data under.

## **11. Data Transfers**

11.1 Whenever we share your PII within our Group of companies, (Aareon AG) who are all based within the EU and for the purposes of delivering you a website, responding to your enquiries and/or in the performance of employment, contract or supplier contract. We ensure an appropriate degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- Data is protected and encrypted in transit and at rest
- Data will be password protected and only sent to the intended recipient

11.2 Whenever we transfer your personal data out of the European Economic Area (EEA), we ensure an appropriate degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared within the EEA.

Transferring data outside of the UK requires the MD and Information Assurance Manager's approval and relevant Information Governance and Security compliance checks.

11.3 Our directors and other appointed individuals working for Aareon may, in limited circumstances, access individuals PII outside of the UK and European Union, e.g. if they are remote working, absent from the office and need to access critical business information or working abroad outside of the UK or European Union. If they do so they will be using our security measures and will be subject to their arrangements with us which are subject to English Law, in line with the GDPR and the same legal protections that would apply to accessing personal data within the UK.

## **12. Confidentiality and security**

12.1 We have implemented security policies, rules and technical measures to protect individual's personal information that we have under our control from:

- Unauthorised access
- Improper use or disclosure
- Unauthorised modification
- Unlawful destruction or accidental loss

12.2 All our employees, representatives, board members and third party contractors (data processors) which we engage, and have access to, and are associated with the processing of your personal information, are obliged to respect the confidentiality and only process the information based on our instructions. We will ensure that your personal information will not be disclosed until all security assurances have been documented unless we are required by law.

### **13. Aareon UK Commercial and Employee Information**

- 13.1 When someone visits our website we will collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. We collect this information in a way which does at times identify a person who contacts us about a product. We do not make any attempt to find out the identities of those visiting our websites as a routine search. If we do want to collect PII through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.
- 13.2 The information held and published on our website and associated websites is only to be used for the purposes it has been published for. We do not consent to any organisation, member of the public to take individuals (data subjects) personal information from our website and use this for their own purposes without Aareon UK's written consent. You can use this to contact us and discuss our services and product options or share with another organisation who you feel would be interested in contacting us.
- 13.3 In the case of unlawful use, we reserve the right to review and carry out legal proceedings.