



A) INTRODUCTION

Tranmere Rovers FC is committed to protecting the privacy and security of your personal information. This Data Protection and Privacy Policy describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR).

This policy applies to all employees, workers and contractors.

B) POLICY

Tranmere Rovers FC is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this policy.

This policy does not form part of any contract of employment or other contract to provide services. We may update this policy at any time but if we do so, we will provide you with an updated copy of this notice as soon as reasonably practical.

It is important that you read and retain this policy, together with any other privacy policy we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information and what your rights are under the data protection legislation.

C) DATA PROTECTION MANAGER

We have appointed a data privacy manager (Paul Morrison) to oversee compliance with this policy. If you have any questions about this policy or how we handle your personal information, please contact the data privacy manager. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

D) DATA PROTECTION PRINCIPLES

We will comply with data protection law. This says that the personal information we hold about you must be:

- 1) Used lawfully, fairly and in a transparent way.
- 2) Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- 3) Relevant to the purposes we have told you about and limited only to those purposes.
- 4) Accurate and kept up to date.
- 5) Kept only as long as necessary for the purposes we have told you about.
- 6) Kept securely.

E) THE KIND OF INFORMATION WE HOLD ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are certain types of more sensitive personal data which require a higher level of protection, such as information about a person's health or sexual orientation. Information

about criminal convictions also warrants this higher level of protection.

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

- 1) Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- 2) Gender and date of birth.
- 3) Next of kin and emergency contact information.
- 4) National Insurance number.
- 5) Bank account details, payroll records and tax status information.
- 6) Salary, annual leave, pension and benefits information.
- 7) Start date and, if different, the date of your continuous employment.
- 8) Leaving date and your reason for leaving.
- 9) Location of employment or workplace.
- 10) Copy of driving licence if driving is part of your assumed duties on a regular basis.
- 11) Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process).
- 12) Employment records (including job titles, work history, working hours, holidays, training records and professional memberships).
- 13) Performance information.
- 14) Disciplinary and grievance information.
- 15) CCTV footage and other information obtained through electronic means such as fob records.
- 16) Information about your use of our information and communications systems
- 17) Photographs.
- 18) Results of HMRC employment status check, details of your interest in and connection with the intermediary through which your services are supplied.

We may also collect, store and use the following more sensitive types of personal information:

- 1) Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- 2) Trade union membership.
- 3) Information about your health, including any medical condition, health and sickness

records.

- 4) Information about criminal convictions and offences.

F) HOW YOUR PERSONAL INFORMATION IS COLLECTED

We collect personal information about employees, workers and contactors through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies.

We will collect additional personal information in the course of job-related activities throughout the period of you working for us.

G) HOW WE WILL USE INFORMATION ABOUT YOU

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- 1) Where we need to perform the contract we have entered into with you.
- 2) Where we need to comply with a legal obligation.
- 3) Where it is necessary for legitimate interests pursued by us or a third party and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

- 1) Where we need to protect your interests (or someone else's interests).
- 2) Where it is needed in the public interest or for official purposes.

H) SITUATIONS WHEN WE WILL USE YOUR PERSONAL INFORMATION

We need all the categories of information in the list above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information include, but are not limited to:

- 1) Making a decision about your recruitment or appointment.
- 2) Determining the terms on which you work for us.
- 3) Checking you are legally entitled to work in the UK.
- 4) Paying you and, if you are an employee or deemed employee for tax purposes, deducting tax and National Insurance contributions (NICs).
- 5) Enrolling you in a pension arrangement in accordance with our statutory automatic enrolment duties.
- 6) Administering the contract we have entered into with you.
- 7) Business management and planning, including accounting and auditing.

- 8) Conducting performance reviews, managing performance and determining performance requirements.
- 9) Making decisions about salary reviews and compensation.
- 10) Assessing qualifications for a particular job or task, including decisions about promotions.
- 11) Gathering evidence for possible grievance or disciplinary hearings.
- 12) Making decisions about your continued employment or engagement.
- 13) Making arrangements for the termination of our working relationship.
- 14) Education, training and development requirements.
- 15) Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work.
- 16) Ascertaining your fitness to work and managing sickness absence.
- 17) Complying with health and safety obligations.
- 18) To prevent fraud.
- 19) To monitor your use of our information and communication systems to ensure compliance with our IT policies.
- 20) To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- 21) Equal opportunities monitoring.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

I) FAILURE TO PROVIDE YOUR PERSONAL INFORMATION

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

J) CHANGE OF PURPOSE

Tranmere Rovers FC will only use your personal information 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 information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

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

K) HOW WE USE SENSITIVE PERSONAL INFORMATION

Special categories of particularly sensitive personal information, such as information about your health, racial or ethnic origin or trade union membership, require higher levels of protection. We have in place appropriate safeguards when processing such data. We may process special categories of personal information in the following circumstances:

- 1) In limited circumstances, with your explicit written consent.
- 2) Where we need to carry out our legal obligations or exercise rights in connection with employment.
- 3) Where it is needed in the public interest, such as for equal opportunities monitoring.

L) SITUATIONS WHEN WE WILL USE YOUR SENSITIVE PERSONAL INFORMATION

In general, we will not process particularly sensitive personal information about you unless it is necessary for performing obligations or rights in connection with employment. On rare occasions, there may be other reasons for processing, such as it is in the public interest to do so. The situations in which we will process your particularly sensitive personal information include, but are not limited to:

- 1) We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits including statutory maternity pay, statutory sick pay, pensions and permanent health insurance. We need to process this information to exercise rights and perform obligations in connection with your employment.
- 2) We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

M) CONSENT

We do not need your consent if we use special categories of your personal information to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the data privacy manager. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

N) INFORMATION ABOUT CRIMINAL CONVICTIONS

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with this policy.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made

the information public.

We may also process such information about employees or former employees in the course of legitimate business activities with the appropriate safeguards.

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of you working for us.

O) DATA SHARING

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

“Third parties” includes third-party service providers (including contractors and designated agents) and other entities within our group.

We require third parties to respect the security of your data and to treat it in accordance with the law.

P) TRANSFERRING INFORMATION OUTSIDE THE EU

Depending on your role, it may be necessary for us to transfer the personal and sensitive information we collect about you to a country outside the EU in order to perform our contract with you.

However, to ensure that your personal information does receive an adequate level of protection we have put in place the following appropriate measures to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection:

- 1) There is a designated member of staff who will collate all the required electronic data and store securely.
- 2) One copy of this information will be retained at Tranmere Rovers FC in accordance with the data protection and privacy policy.
- 3) A second copy of this data will be available to the Chinese government for the purpose of obtaining a work visa and then will be subsequently destroyed once the visa is created.

Q) DATA SECURITY

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

R) DATA RETENTION

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, 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, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee, worker or contractor of the company we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

S) DUTY TO INFORM US OF CHANGES

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

T) EMPLOYEE RIGHTS

Under certain circumstances, by law you have the right to:

- 1) **Request access** to your personal information
- 2) **Request correction** of the personal information that we hold about you.
- 3) **Request erasure** of your personal information. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing.
- 4) **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- 5) **Request the restriction of processing** of your personal information.
- 6) **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the data protection manager in writing.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.