General Data Protection Regulations

Employee Privacy Notice

Introduction and Aims

AFE Group Ltd is committed to maintaining the accuracy, confidentiality and security of your personal information. This privacy notice describes the personal information that AFE Group Ltd collects from or about you, why we need it, and how we use or may disclose it, what protections are in place to keep it secure and, the subsequent disposal of your data.

Privacy at AFE Group Ltd

It is the AFE Group Ltd policy to:-

- Process your personal information fairly and in accordance with applicable laws;
- Tell you (either directly or in our policies) about how we will use your personal information
- Only collect personal information from you when we need it for legitimate purposes, or legal reasons
- Ensure that your personal information is adequate, relevant and not excessive for the purpose for which we collect it;
- Not keep your personal information for longer than we need to
- Keep your personal information secure, and limit the people who can access it
- Ensure that you know how to access your personal information and exercise your rights in relation to it, including being able to keep it accurate and up-to-date; and
- Ensure that any third parties we share your personal information with take appropriate steps to protect it

Application

The AFE Group Ltd is recognised as a leading international business specialising in the innovative design, manufacture and service support of professional cooking, bakery and refrigeration equipment for the global food service market.

We operate from 15 locations worldwide, including eight in the UK, together with operations based in France, UAE, China and Australia.

AFE Group Ltd is organised into five autonomous business units trading under the business and brand names of:-

Brand Business	Activity	Website
AFE Group Ltd	Business holding entity	www.theafegroup.com
Williams Refrigeration	Refrigeration Equipment	www.williams-refrigeration.com
Falcon Foodservice Equipment	Commercial Cooking & Catering Equipment	www.falconfoodservice.com
Mono Equipment	Bakery Equipment	www.monoequip.com
Millers Vanguard	Maintenance and service of bakery and foodservice equipment	www.millersvanguard.co.uk
Serviceline	Maintenance and service of foodservice equipment	www.service-line.co.uk

What personal information we collect and how it will be used

As your employer, AFE Group Ltd needs to keep and process information about you for normal employment purposes. The information we hold and process will be used for our management and administrative use only. We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately, during the recruitment process, whilst you are working for us, at the time when your employment ends and after you have left.

This includes using information to enable us to comply with the employment contract, to comply with any legal requirements, pursue the legitimate business interests of the Company and protect our legal position in the event of legal proceedings, to prevent fraud or reporting potential crimes.

If you do not provide this data, we may be unable in some circumstances to comply with our obligations and we will tell you about the implications of that decision.

We collect and use different types of personal information about you, depending on your circumstances, your role and the law, which may include:-

- Recruitment purposes and pre-employment checks

- Human Resources administration for the purposes of managing your employment relationship with us, your contract and terms of employment, processing your pay, pensions and any associated contractual benefits and expenses; records of holiday, sickness and other absence; information needed for equal opportunities monitoring policy; and records relating to your career history, such as training records, appraisals, other performance measures and, where appropriate, disciplinary and grievance records
- To contact you or your nominated contact in the case of an emergency (yours or ours)
- Finance, fraud prevention, and financial administration with government departments for tax, national insurance and other associated obligations
- Insurance policies and associated work related personal injury compensation claims
- Security and Safeguarding for the prevention and detection of wrong doing and crime

Much of the information we hold will have been provided by you, but some may come from other internal sources, such as your manager, or in some cases, external sources, such as referee.

The appendix to this policy sets out an illustrative and non-exhaustive example of the types of information we collect and why we collect it.

From time to time you may also be personally referred to in company documents and records that are produced by you and your colleagues in the course of carrying out your duties and the business of the company.

Where necessary, we may keep information relating to your health, which could include reasons for absence and GP reports and notes. This information will be used in order to comply with our health, safety and occupational health obligations – to consider how your health affects your ability to do your job and whether any adjustments to your job might be appropriate. We will also need this data to administer and manage statutory and company sick pay, pension scheme and life insurance policies.

Where we process special categories of information relating to your racial or ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, biometric data or sexual orientation, we will always obtain your explicit consent to those activities unless this is not required by law or the information is required to protect your health in an emergency. Where we are processing data based on your consent, you have the right to withdraw that consent at any time.

In addition, we may monitor company computer, telephone/mobile telephone use. We deploy on site CCTV and in vehicle CCTV to enhance the security of our property and to protect the people who work at these sites and travel in our vehicles. CCTV will be monitored for security reasons, for evidence of misuse, or where we have grounds for suspecting a criminal or serious disciplinary offence has been committed.

AFE Group also operates physical access control at some of its premises, and may also be required to comply with such arrangements at third party sites where you need access to complete your job, and ensure site security. Access controls may take the form of an electronic access card that contains personal information and photographic ID. This information is stored and may be monitored for security compliance, used in the event of an emergency or an investigation by AFE Group Ltd, third parties or the Police.

We also keep records of your hours of work by way of our clocking on and off system. Details and explanation of these particulars are set out in various policy documents and are available in the respective AFE Group business unit handbook.

Other than as mentioned below, we will only disclose information about you to third parties if we are legally obliged to do so or where we need to comply with our contractual duties to you, for instance we may need to pass on certain information to external payroll providers, pension, or health insurance schemes.

Who has access to your personal information?

AFE Group Ltd policy is that only those who have a legitimate need to access your personal information will be able to do so.

For example: Your line manager may hold local records on performance, notes of one to one interviews, emergency contact numbers, etc. He/she will also be able to access information AFE Group Ltd holds about you on the Company's HR systems which includes general job related information, current pay, and absence history.

Dedicated HR, Finance and other professionals will also have access to information about you, for example, to enable them to manage the needs of the business, provide specialist support to management and to calculate pay and bonus entitlements.
Where you are asked to provide information relating to ethnicity and disability, and you provide it, access to this is restricted to a much smaller group who need to know this information to enable AFE Group Ltd to comply with its policies or its legal obligations.

We may transfer information about you to other AFE group business units or Ali Group companies for purposes connected with your employment or the management of the company's business.

In limited and necessary circumstances we may share your personal information with other organisations globally when we have a business need to do so and only when we have appropriate arrangements in place with the relevant organisation to keep your personal information secure.

This may include for example third parties who provide AFE Group with HR administrative services, finance administration and services, or who provide IT support to you.

Where we need to share your personal information, we will do so in line with this notice and our legal obligations, including ensuring that the third party we are sharing it with has appropriate technical and organisational measures and processes in place to keep your personal information secure, and that they only use it in accordance with our instructions.

In some cases, personal information about you may be provided to third parties if you have given your prior consent to such disclosure, for example if we are required to do so to comply with a Court Order or some other legal requirement.

How long do we keep your personal data?

AFE Group Ltd will only hold your personal data for as long as there is a business need or a legal obligation to keep it. When the information is no longer required it is either deleted from electronic systems or securely shredded.

If in the future we intend to process your personal data for a purpose other than that which it was collected we will provide you with information on that purpose and any other relevant information.

How does the AFE Group Ltd protect your personal information?

We have security arrangements in place to guard against unauthorised access, improper use, alteration, destruction or accidental loss of your personal information. You are required to help with this by ensuring that your own personal information and that of your colleagues and third parties are kept secure. You should not share your (or anybody else's) personal information unless there is a genuine business reason for doing so.

We take appropriate organisational and technical security measures and have rules and procedures in place to ensure that any personal information we hold on computer systems is not accessed by anyone it shouldn't be. Information about the IT Security standards we use to protect your personal information can be found in the respective AFE Group Ltd business unit IT policies and procedures

When we use third party organisations to process information on our behalf we ask them to demonstrate their compliance with our security requirements, and any instructions we may give them and their compliance with relevant data protection legislation throughout the time they work for AFE Group Ltd. These organisations take their instructions from us and their obligations with regard to what information they process and what they can do with it are agreed in the contracts we have with them.

How can you keep your personal information accurate and up to date?

It is important that the personal information we hold about you is kept accurate and up to date. We therefore need you to inform us of any change or update to your personal information. Please speak to your line manager or the HR department if you are unsure how to update your personal information

How can you request access to the personal information AFE Group Ltd holds about you?

If you have any questions about the personal information that we hold about you we suggest that you speak to your line manager or HR Department in the first instance. Providing certain conditions are met, you can often formally request to see the personal information that AFE Group Ltd holds about you. This is called a "data subject access request."

In the event that we cannot provide you with access to your personal information, we will endeavour to inform you of the reasons why, subject to any legal or regulatory restrictions.

If you have further questions or concerns?

If you have any questions about the AFE Group privacy statement or concerns about how we manage your personal information, please contact the AFE Group Data Protection Officer at AFE Group Ltd, Bryggen Road, North Lynn Industrial Estate Kings Lynn Norfolk PE30 2HZ
Telephone 01553 817554
Email dataprivacy@theafegroup.com

We will endeavour to answer your questions and advise you of any steps taken to address the issues raised by you.

Revisions to this Privacy Policy

AFE Group may from time to time make changes to this Privacy Policy to reflect changes in its legal and regulatory obligations or in the manner in which we deal with your personal information. We will communicate any revised version of this Privacy Policy. Any changes to this Privacy Policy will be effective from the time they are communicated, provided that any change that relates to why we collect, use or disclose your personal information does not require your consent. Where specific consent is required to such collection, use or disclosure, the date this becomes effective will not be until we have obtained your consent to such change.

This Privacy Policy was issued 1st May 2018