



Specialists in Security & Facilities Management

GDPR PRIVACY NOTICE

INTRODUCTION

SFM (UK) Ltd is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

It applies to all employees, workers and contractors.

SFM (UK) Ltd 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 privacy notice.

This notice applies to current and former employees, workers and contractors. This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you.

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 specified, explicit and legitimate purposes and not used in any way that is incompatible with those purposes.
3. Adequate, relevant and limited to what is necessary.
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 and protected against unauthorised or unlawful processing, accidental loss, destruction or damage.
7. Processed in accordance with our accountability obligations under UK GDPR.

THE KIND OF INFORMATION WE HOLD ABOUT YOU

Personal data means any information about an individual from which that person can be identified. It does not include anonymous data.

There are "special categories" of more sensitive personal data which require a higher level of protection.

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

- Personal contact details such as name, title, addresses, telephone numbers and personal email addresses
- Date of birth
- Gender
- Marital status and dependants
- Next of kin and emergency contact information
- National Insurance number
- Bank account details, payroll records and tax status information
- Salary, annual leave, pension and benefits information
- Start date and employment history
- Location of employment or workplace
- Copy of driving licence (where required)
- Recruitment information including right to work documentation and references.
- Employment records including working hours, training records and professional memberships.
- Compensation history.
- Performance information.
- Disciplinary and grievance information.
- CCTV footage and access control records.
- Information about your use of our information and communication systems.
- Photographs (where appropriate).

We may also collect and use the following “special categories” of more sensitive personal information:

- Information about your race or ethnicity (for equality monitoring).
- Information about your health, including medical conditions and sickness records.
- Trade union membership information (where applicable).
- Information about criminal convictions and offences (where lawful and appropriate).

HOW YOUR PERSONAL INFORMATION IS COLLECTED

We collect personal information through:

- The recruitment and vetting process.
- Directly from you.
- Employment agencies or background check providers.
- Former employers or referees.
- Regulatory bodies (where applicable).
- Workplace systems such as CCTV and IT monitoring systems.

Additional personal data may be collected during the course of your employment.

HOW WE WILL USE INFORMATION ABOUT YOU

We will only use your personal information where 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 or regulatory obligation.
3. Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests.

We may also use your personal information:

1. To protect your vital interests or those of another person.
2. Where processing is in the public interest or for official purposes.

SITUATIONS IN WHICH WE WILL USE YOUR PERSONAL INFORMATION

(Your existing bullet list remains appropriate and can stay.)

Add at the end of this section:

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

Where we rely on legitimate interests, we ensure that such interests are balanced against your rights and freedoms.

HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION

Special category data will only be processed where we have an appropriate lawful basis under UK GDPR and Schedule 1 of the Data Protection Act 2018.

This may include:

- Compliance with employment and health and safety law
- Managing sickness absence
- Assessing fitness to work
- Providing workplace adjustments
- Equality monitoring
- Legal claims

DO WE NEED YOUR CONSENT?

We do not normally rely on your consent to process personal data where processing is necessary to:

- Perform the employment contract.
- Comply with legal obligations.
- Exercise employment law rights.

In limited circumstances, we may request your explicit written consent, for example for:

- Use of photographs for marketing purposes.
- Participation in optional initiatives.

If we rely on consent:

- It will not be a condition of employment.
- You may withdraw consent at any time.

INFORMATION ABOUT CRIMINAL CONVICTIONS

We may process information relating to criminal convictions and offences where permitted by law and where necessary for employment, safeguarding, regulatory compliance or contractual requirements.

Such processing is carried out in accordance with:

- Article 10 UK GDPR
- Schedule 1 of the Data Protection Act 2018

Where required for security roles, DBS checks may be undertaken. Criminal conviction data is subject to enhanced security controls and restricted access.

DBS certificate information will not be retained longer than permitted under the DBS Code of Practice.

DATA SHARING

We may share your data with:

- Payroll providers
- Pension providers
- IT service providers
- DBS agencies
- Regulators
- Insurers
- Legal advisors

All third parties are required to respect the security of your data and to process it in accordance with the law.

SFM (UK) Ltd does not routinely transfer personal data outside the United Kingdom. If this changes, appropriate safeguards such as the UK International Data Transfer Agreement (IDTA) will be implemented.

DATA SECURITY

We have put in place appropriate technical and organisational security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We limit access to your personal data to those who have a legitimate business need to know.

We have procedures in place to detect, report and investigate suspected personal data breaches and will notify the Information Commissioner's Office (ICO) and affected individuals where legally required.

DATA RETENTION

We will only retain your personal information for as long as necessary to fulfil the purposes for which it was collected, including satisfying legal, accounting or reporting requirements.

Retention periods are determined in accordance with our Data Retention Schedule and relevant statutory limitation periods.

Once retention periods expire, personal data will be securely deleted or anonymised.

RIGHTS OF ACCESS, CORRECTION, ERASURE AND RESTRICTION

Your duty to inform us of changes

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

Your rights in connection with personal information

Under UK GDPR you have the right to:

- Request access to your personal data
- Request correction of inaccurate data.
- Request erasure (where legally applicable).
- Request restriction of processing.
- Object to processing based on legitimate interests.
- Request data portability (where applicable).
- Withdraw consent where processing is based on consent.

We will respond within one calendar month unless the request is complex.

RIGHT TO COMPLAIN

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO):

Information Commissioner's Office
Wycliffe House
Water Lane, Wilmslow
Cheshire, SK9 5AF

Helpline: 0303 123 1113
Website: www.ico.org.uk

DATA PROTECTION GOVERNANCE

SFM (UK) Ltd is not legally required to appoint a formal Data Protection Officer but has designated a Data Protection Lead responsible for overseeing compliance.

Data Protection Lead:
Kayleigh McVicar – Business Manager
Email: admin@sfm-uk.com
Tel: 01525 2600001

Approved by: George Hewitt
Position: Director, SFM UK Ltd
Effective Date: 13/02/2026
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