

## **Human Resources Privacy Notice: How we use Personal Information**

### **Introduction**

This notice explains how we collect, use and store your personal information. Your privacy and personal information are important to us and we are committed to keeping it protected. We've tried to make this notice as clear and transparent as possible, so you are confident about how we use your information. As data controller, we are responsible for decisions about how your information will be processed and managed. You will also find details below regarding your rights under data protection laws and how to contact us.

### **1. Who we are and whose personal information we collect**

When we refer to "we", "us" and "our" in this notice it encompasses one or more of the trading companies of Allianz Holdings plc that operate in the United Kingdom (UK). Employees are contracted by Allianz Management Services Limited. For more information please visit [www.allianz.co.uk](http://www.allianz.co.uk).

When we say, "you" and "your" in this notice, we mean anyone whose personal information we may collect, including:

- candidates who participate in the recruitment process
- prospective employees as part of the job offer process
- permanent and temporary employees, directors and non-executive directors
- consultants and interns
- anyone who may benefit from flexible benefits including spouse, partner and dependents
- ex-employees in order to meet our legal, regulatory or contractual obligations.

### **2. The personal information we collect**

We may collect the following types of personal information about you to allow us to complete the activities in Section 4: How we use your personal information. We may process your data for different reasons. These are; a Legal Obligation (LO), a Contractual Obligation (CO) or Legitimate interest (LI) set out in brackets are the reasons we will process each type of data. We may use your data for more than one reason as set out below in brackets:

- basic personal details, such as your full name, age/date of birth, address, telephone numbers and personal email addresses and gender (LO/CO/LI)
- family, lifestyle and social circumstances, such as your marital status, dependants, partner, spouse and emergency contact details (LO/CO/LI)
- financial details, including bank account information, tax code, student loans (LO/CO/LI)
- employment information, such as national insurance number, P45 and earnings with previous employers (LO/CO/LI)
- career history, employment references, education, qualifications and professional memberships, including future aspirations (CO/LI)
- evidence of your right to work in the UK, such as passport, Visa, EU card, birth certificate (LO/CO/LI)
- photographs and video, such as security passes and onsite CCTV (CO/LI)

- tracking and location information from appropriately enabled work devices if relevant to your role (to the extent that is covered by collectively bargained agreements where applicable) (LI)
- identification checks and background vetting, such as signatures, credit checks, criminal checks, driving licence details for relevant job roles (LO/CO/LI)
- information required for specific business standards for example regulated roles; to meet regulatory and legal requirements (LO/CO/LI)
- fraud and counter-terrorism checks (LO/CO/LI)
- third party deductions from pay roll such as Pension Schemes, Give as you Earn, Court Orders, Share Incentive Plan; where your deduction made is passed to the relevant body (LO/CO/LI)
- outcomes from the ongoing assessments of your performance and development (LI)
- the information about how you use company devices such as computers and mobile phones (LI).

In certain circumstances, we may request and/or receive special category or sensitive information about you. We would only collect this information if it is relevant to your employment or potential employment or where it is necessary for a legal obligation:

- ethnicity information
- third party deductions from pay roll such as union membership
- health and safety related personal information including disability and access requirements, work place adjustments, health and medical checks, and occupational health referrals (LO/CO/LI)
- criminal offences, including alleged offences, criminal proceedings, outcomes and sentences (previous criminal convictions, bankruptcies and other financial sanctions such as County Court Judgements) (LO,CO,LI).
- information held for diversity monitoring purposes (LO,CO,LI).

### **3. Where we collect personal information**

We collect personal information from you, your representatives, the electronic systems you use to communicate with us and information you have made public, for example, information you have made public on social media or shared openly with colleagues or potential colleagues at Allianz.

We also collect personal information from other persons, organisations and systems, for example:

- screening agencies, credit reference and fraud prevention agencies, criminal records agencies, counter-terrorism agencies and sanctions lists, education or professional bodies and previous employers
- Her Majesty's Revenue and Customs (HMRC), the Child Support Agency (CSA), the Department for Work and Pensions (DWP), Her Majesty's Courts and Tribunals Service (the courts), Tax and international assignment advisors and HM Treasury
- occupational health providers and other medical professionals
- pension providers and trustees and employee benefits provider
- professional and accredited bodies such as the Chartered Insurance Institute (CII), Society of Operations Engineers (SOE) and Bureau of Engineer Surveyors (BES).

#### **4. How we use your personal information**

We use your personal information in the following ways:

- to identify you, offer you a contract of employment and manage your ongoing employment to fulfil our contract, for example to manage your ongoing training & development and travel and expenses
- to determine your right to work in the UK, for health and safety purposes and prevent financial crime to validate information if it is required for specific roles e.g. the Insurance Distribution Directive, Approved Persons, to meet our legal obligations using various third party sources
- to validate the information you give us at recruitment stage or during employment using various third party sources in order to comply with our regulatory obligations and with a view to the prevention and detection of crime (including but not limited to the Consolidated List of Financial Sanctions Targets)
- to use your emergency contact details in the case of an emergency related to you
- to send relevant office equipment or work-related items to you where required.

In line with our policies, we will make every effort to ensure that the information held about you is accurate, and where necessary, kept up to date. It is your responsibility to ensure that your information contained in the HR database is accurate and kept up to date. In the absence of evidence to the contrary we will assume that the information provided by you is accurate. If there is any reasonable doubt as to the accuracy of the data, we will contact you to confirm the information. Should you inform us, or we otherwise become aware, of any inaccuracies in the information, the inaccuracies shall be rectified promptly.

**You have the right to object to us using your personal information.**

**You can do this at any time by telling us and we will consider your request and either stop using your information or explain why we are not able to. Further details can be found below.**

#### **5. Automated decision making**

We use automated decision making in order to filter candidates for the Allianz Graduate Scheme. There is a minimum educational qualification requirement; candidates tell us what qualifications they have and we validate this by checking applications against our minimum qualification requirements.

If you disagree with the outcome of an automated decision, please contact our HR Resourcing Manager at [hr-recruitment@allianz.co.uk](mailto:hr-recruitment@allianz.co.uk) and we will review the decision.

#### **6. Sharing personal information**

We may share your information with:

- other companies within the global Allianz Group [www.allianz.co.uk](http://www.allianz.co.uk) Please see Section 7: Transferring personal information outside the UK.

- agencies that carry out certain activities on our behalf, such as verification companies for assessing suitability for employment, Pension Scheme providers, trustees and employee benefits providers, occupational health and bi-annual safety critical health assessments providers, People Safe to support lone working employees
- legal bodies that are entitled to ask us for personal information, such as regulators, law enforcement agencies and the Financial Ombudsmen Service (FOS). This includes exchanging information with other companies and organisations for the purposes of fraud prevention and credit risk reduction
- Credit Industry Fraud Avoidance Service (Cifas)
- The United Kingdom Accreditation Service (UKAS), Lloyd's Register Quality Assurance (LRQA) and Safety Assessment Federation (SAFed)
- prospective buyers in the event we wish to sell all or part of our business.
- any organisation you explicitly ask us to share your information with for example mortgage providers
- some organisations may share your data with us as a controller or joint controller of your data such as the pension provider, trustees and employee benefits providers, occupational health providers and other medical professionals.
- some organisations for the purpose of setting up accounts to manage travel and expenses.
- external suppliers to test the security of our systems and processes.
- external suppliers to send work-related equipment to employees' personal addresses where required.

## **7. Transferring personal information outside the UK**

We use servers located in the European Union (EU) to store your information, where it is protected by laws equivalent to those in the UK. We may transfer your information to other members of the global Allianz Group to manage your employment; this could be inside or outside the EU. We have established a set of Binding Corporate Rules (BCR's) which are our commitment to the same high level of protection for your personal information regardless of where it is processed. These rules align with those required by the European Information Protection authorities. If you would like more information about the BCR's please contact our Data Protection Officer.

Some of our suppliers have servers outside the EU. Our contracts with these suppliers require them to provide equivalent levels of protection for your personal information.

## **8. Monitoring**

We may monitor your electronic communications and use of websites for the purpose of establishing compliance with regulatory procedures, to prevent or detect crime, to investigate or detect unauthorised use of our systems, to monitor standards of service and staff performance or to enforce compliance with our practices or procedures. Full details of monitoring activities are set out in the Section 2.14 of the Information Security Acceptable Use Standard.

## **9. How long we keep your personal information**

We keep your information only for as long as we need it to administer your employment, manage our business or as required by regulators, law or contract.

We have a Retention and Destruction policy which details the retention of key employee data. For example:

- Unsuccessful candidates – CVs, application forms and interview notes will be destroyed after 12 months from the end of the recruitment process or from the last time there was activity on the candidate's recruitment account
- Employees (Permanent and Fixed Term Contracts) – personal files which hold new starter information, contract changes and other employment information are destroyed 7 years after leaving
- In line with regulatory accountability requirements for specific roles who are either a Senior Manager or a Certified post holder under the FCA/PRA Senior Manager and Certification Regime – destroyed 10 years after leaving
- Industrial Disease – occupational health records will be destroyed 40 years after leaving.

## 10. Know your rights

Any individual whose personal information we hold has a number of rights in relation to how that information is processed by us. You have the following rights:

- **The right to object** – you can object to us processing your data and we will either agree to stop processing or explain why we are unable to
- **The right of access**– you can request a copy of the personal information we hold about you, subject to certain exemptions (a subject access request)
- **The right of rectification** – you can ask us to update or correct your personal information to ensure its accuracy
- **The right to be forgotten** – you can ask us to delete your personal information from our records if it is no longer needed for the original purpose. It is unlikely we will be able to erase certain information whilst you remain an employee, as it will be necessary for the purposes of your continuing employment and to meet our obligations. Requests will be addressed on a case by case basis.
- **The right of restriction** – you can ask us to restrict the processing of your personal information in certain circumstances
- **The right to data portability** – in certain circumstances, you can ask for a copy of your personal information, so it can be used for your own purposes
- **The right to withdraw consent** – you can ask us, at any time, to stop processing your personal information, such as for marketing purposes, if the processing is based only on your consent
- **The right to make a complaint** – you can make a complaint if you feel your personal information has been mishandled. We encourage you to come to us in the first instance but you are entitled to complain directly to the Information Commissioner's Office (ICO) [www.ico.org.uk](http://www.ico.org.uk)

If you wish to exercise any of these rights please contact our HR Services Team Leader:

Phone: 01483 759759

Email: [hrservices@allianz.co.uk](mailto:hrservices@allianz.co.uk)

Address: HR Services, Allianz Insurance Plc, 57 Ladymead, Guildford, Surrey, GU1 1DB

#### **11. Allianz (UK) Group Data Protection Officer contact details**

If you have any queries about how we use your personal information, please contact our Data Protection Officer:

Phone: 0330 102 1837

Email: [dataprotectionofficer@allianz.co.uk](mailto:dataprotectionofficer@allianz.co.uk)

Address: Data Protection Officer, Allianz Insurance plc, 57 Ladymead, Guildford, Surrey GU1 1DB

#### **12. Changes to our Privacy Notice**

This Privacy Notice was last updated September 2020.

Occasionally it may be necessary to make changes to this notice. When that happens we will provide you with an updated version at the earliest opportunity. The most recent version will always be available on our website [www.allianz.co.uk](http://www.allianz.co.uk)