

Bridgehead Privacy Notice

We ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

Who we are

BRIDGEHEAD (UK) LIMITED and BRIDGEHEAD (EUROPE) LIMITED will usually only obtain personal information about you directly from your Employer but may also on occasion directly collect, use and be responsible for certain personal information about you. In either case we are regulated under the [General Data Protection Regulation](#) ('GDPR') which applies across the European Union (including in the United Kingdom) and the Data Protection Act 2018. Where your Employer has transferred personal information about you to us, they are responsible as 'controller' of that personal information and we are a 'processor' for the purposes of those laws. If we have collected personal information directly from you, we are responsible as 'controller' of that personal information.

'Employer' means any organisation that provides your personal information to us for payroll purposes, regardless of whether you are engaged as an employee, worker or otherwise.

The personal information we collect and use

Information collected by us

Where we collect personal data directly from you we may collect the following personal information when you provide it to us:

- See Appendix 1

Information collected from other sources

Your Employer will usually provide us with your personal information as follows:

- See Appendix 1

How we use your personal information

We use your personal information to:

- See Appendix 1

Who we share your personal information with

In order to deliver our services effectively we may send your personal data to third parties, such as those that we engage for professional compliance, accountancy or legal services as well as product and platform providers that we use to arrange financial products for you. For further enquiries and details regarding our third-party service providers, please contact us (contact details below).

Where third parties are involved in the processing of your personal data we shall only engage third party processors that take appropriate security measures to protect your personal data and we shall impose contractual obligations on them so that they can only process your personal data for specified purposes and in accordance with our written instructions.

Where it's necessary for personal data to be forwarded to a third party we'll use appropriate measures to protect your personal data in transit. This will include the use of passwords and / or encryption of data where this is possible.

To fulfil our obligations in respect of prevention of money- laundering and other financial crime we may send your details to third party agencies for identity verification purposes. We will share personal information with law enforcement or other authorities if required by applicable law.

We will not share your personal information with any other third party.

Whether information has to be provided by you, and if so why

We collect information about you in order to provide you and/or your Employer with the services that we are engaged to deliver.

How long your personal information will be kept

- We will hold your personal data for the period we are required to retain this information by applicable UK tax law (currently 6 years from the end of the last financial year they relate to).

Reasons we can collect and use your personal information

We rely on the following as the lawful bases on which we collect and use your personal data:

- the performance of a contract; and/or
- to comply with our legal and regulatory obligations; and/or
- for our legitimate interests or those of a third party, eg to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you.

The above do not apply to special category personal data. We will only process special category personal data (as defined under article 9 GDPR) if one of the grounds under article 9(2) applies, which includes:

- obtaining your explicit consent;
- where necessary to protect your vital interests;
- processing is necessary for the establishment or defence of legal claims;
- processing is necessary to comply with our legal obligations.

Your rights

Under the [General Data Protection Regulation](#) you have a number of important rights free of charge. In summary, those include rights to:

- fair processing of information and transparency over how we use your use personal information
- access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address
- require us to correct any mistakes in your information which we hold
- require the erasure of personal information concerning you in certain situations
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal information concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you

- object in certain other situations to our continued processing of your personal information
- otherwise restrict our processing of your personal information in certain circumstances

For further information on each of those rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please:

- email or write to us at payroll@bridgehead.org.uk or Data Protection, Bridgehead (UK) Limited, First Floor 2 Ducketts Wharf, South Street, Bishop's Stortford, Herts CM23 3AR
- let us have enough information to identify you (*eg Employee Number, Name, NI Number*),
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- let us know the information to which your request relates.

If we are the controller of your personal data then we will handle your request ourselves. However, if your Employer is the controller then we will need to refer your request to them.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

How to complain

We hope that we can resolve any query or concern you raise about our use of your information.

The [General Data Protection Regulation](#) also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

Changes to this privacy notice

This privacy notice was published on 1st July 2018 and last updated on 1st July 2018.

We may change this privacy notice from time to time, when we do we will inform you via our website www.bridgehead-europe.com.

How to contact us

Please contact us if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact us please send an email to payroll@bridgehead.org.uk , write to Data Protection, Bridgehead (UK) Limited, First Floor 2 Ducketts Wharf, South Street, Bishop's Stortford, Herts CM23 3AR or call 01279 654696.