Privacy Notice

for co-owners, workers and contractors

Edition Date: November 2025

1. What is the purpose of this document?

Turley Associates Limited ("**we**", "**our**", "**us**" "**Turley**") 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 data protection and privacy laws applicable to Turley (including, as applicable: the Data Protection Act 2018, UK General Data Protection Regulation ("**UK GDPR**"), and the General Data Protection Regulation (EU) 2016/679 ("**EU GDPR**")).

It applies to all employees ("**co-owners**"), workers and contractors.

Turley is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you ("**you**", "**your**"). 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 co-owners, 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, so that you are aware of how and why we are using such information. This privacy notice should also be read in conjunction with our **Data Protection Policy** and the guidance available on our intranet.

This notice explains what personal data Turley holds about you, how we share it, how long we keep it and what your legal rights are in relation to it.

Turley is a private limited company, with registered company number 02235387, and our registered office is situated at Level 5 Transmission, 6 Atherton Street, St John's Enterprise City, Manchester, United Kingdom, M3 3GS.

If you have any further questions regarding your role at Turley please contact the Turley HR team (careers@turley.co.uk).

2. Data protection principles

We will comply with UK 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.

3. The kind of information we hold about you

Personal data, or personal information, means any information relating to you as a living individual from which you can be identified. It does not include data where the identity has been removed (anonymous data).

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

The categories of personal data that we may collect, store and use about you include (but are not limited to):

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Personal details/data such as date of birth, gender, marital status etc.
- Family details - Next of kin and emergency contact information, details of any life assurance beneficiaries and dependants.
- National Insurance number.
- Bank account details, payroll records, tax status information and student loan information.
- Salary, annual leave, pension and benefits information.
- Start date.
- Leave date and leaver feedback.
- Location of employment or workplace.
- Vehicle information (for calculation of mileage)
- Copy of driving licence (if applicable) and passport.
- Right to work confirmation.
- 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).
- Employment records (including job titles, work history, working hours, annual leave records, absence records, training records and professional memberships, educational/professional attainment certificates).
- Performance information including disciplinary and grievance information.
- Computing and email information, including login information for our IT systems, IP address(es), equipment allocated to you and records of network access.
- Photographs/videos.

We will also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your health, including any medical condition, health and sickness records and any special leave taken.
- Information relating to leaves of absence, which may include sickness absence or family related leaves.
- Information about physical or mental health, or disability status.
- Information about co-owners' race, nationality or ethnic origin, religious beliefs, or sexual life or sexual orientation
- Information about criminal convictions.

4. How is your personal information collected?

We typically collect personal information about co-owners, workers and contactors through the application and recruitment process, either directly from candidates, including via our website, or sometimes from an employment agency. We may sometimes collect additional information from third parties including former employers 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.

5. How we will use information about you

We will use your personal information as follows:

- To carry out our obligations under your employment contract with us.
- To administer your employee file including paying you or providing a benefit.
- To provide you with information about your employment or engagement.
- To manage sickness absence.
- To gather evidence for possible grievance or disciplinary hearings.
- To conduct performance reviews, managing performance and determining performance requirements.
- To assess your qualifications for a particular job or task, including decisions about promotions.
- To deal with legal disputes involving you, or other co-owners, workers and contractors, including accidents at work.
- To manage education, training and development requirements.

    Our lawful basis for the activities above is necessity for us to perform our contract with you.

- Checking you are legally entitled to work in the UK.
- Ascertaining your fitness to work.
- Complying with health and safety obligations.
- Equal opportunities monitoring.

    Our lawful basis for the activities above is necessity for us to comply with our legal obligations.

- At the end of your employment, or engagement, with us for analysis of staff turnover.

    Our lawful basis for this activity above is the pursuit of our legitimate interests of recruiting individuals into Turley as part of our business plan.

- For audit purposes.

    Our lawful basis for the activities above is the pursuit of our legitimate interests of operating and expanding our business activities lawfully.

- To respond to reference requests from future employers with your permission. The information we provide in response to reference requests is name, job title/s and dates employed.

    Our lawful basis for this activity above is on the basis of your consent.

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

We may also use your personal information, typically in an emergency, where this is necessary to protect your vital interests, or someone else's vital interests. In a small number of cases where other lawful bases do not apply, we will process your data on the basis of your consent.

6. If you fail to provide 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).

7. Change of purpose

We 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.

8. How we use particularly sensitive personal information

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. 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 and in line with our data protection policy.

3. Where it is needed in the public interest, such as for equal opportunities monitoring and in line with our data protection policy.

4. Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed 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.

Our obligations as an employer

We will use your particularly sensitive personal information in the following ways:

- We will use information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws.

- 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.

- We will use information about co-owners' race, nationality or ethnic origin, religious beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting. This information is collected anonymously via an annual Inclusion and Diversity Survey.

Do we need your 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 accordance with our written policy. 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.

9. Information about criminal convictions

We may be notified about criminal convictions directly by you in the course of you working for us. 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 our data protection 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.

10. Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

1. Where we have notified you of the decision and given you 21 days to request a reconsideration.

2. Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.

3. In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

11. Data sharing

We may have to share your data with third parties, including third-party service providers. We require third parties to respect the security of your data and to treat it in accordance with the law. 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.

We may transfer your personal information outside the UK. If we do, you can expect a similar degree of protection in respect of your personal information.

Why might you share my personal information with third parties?

We may 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.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents). Third party service providers and the activities they carry out include, but are not limited to, the following examples. They may be updated or amended from time to time at the company's sole discretion:

- Pay Partners – salary and payroll related information. (UK Payroll). Data relating to new starters, leavers, absence, temporary and permanent changes to your address, salary, benefits and pension is shared with Pay Partners and they in turn generate payslips.

- Benefiz (Towergate) – this is Turley's appointed benefits consultant and benefits platform provider. Information shared with Benefiz is: contact details, DOB, NI number, gender, role details and salary information, dependent details. The information is shared with Aviva (pension), AXA (private medical insurance), Doctor@Hand (virtual GP service), Zurich (death in service benefit), MetLife (income protection) and Health Assured (Employee Assistance Programme). Depending on which benefits you have, your data may also be shared with; Unum (dental insurance), BUPA (health screening), Canda Life (critical illness cover), Edenred (childcare vouchers), The Voucher Shop (retail vouchers through Sodexo), The Benefit Hub (discounts platform), Cycle Scheme (Cycle to Work vouchers), Tusker (car leasing) and Payroll Giving (Give As You Earn charitable donations). Where the relevant benefits are selected, your name and email address may also be shared with Norton (anti-virus protection) and Octopus Legacy (will-writing). We are also required to disclose to an insurer anything we might be aware of which may be relevant for the purpose of pricing a risk.

- Doctor Care Anywhere – Provider of virtual GP service Doctor@Hand As part of the service provided by AXA PPP healthcare, AXA PPP shares data about co-owners eligible for Doctor@Hand. The data shared by AXA is:

    - Membership number

- Employee name, data of birth, postal address and email address

- Dependants – name and date of birth (used by Doctor Care Anywhere only for the purpose of adding the number of dependants to the account)

Once a co-owner signs up with Doctor@Hand, Doctor Care Anywhere will provide a data processing statement relating to the personal information that is processed in order to provide the service. For information on the full terms and conditions, registering and how to use this service go to the Doctor@Hand link on your Wellbeing Hub *www.axappphealthcare.co.uk/wellbeinghub*.

- PeopleHR – this is a cloud-based platform that Turley uses for its HR and payroll processes. The information shared with PeopleHR is (contact details, DOB, NI number, gender, role details and pay/benefits information, dependent details, nationality and ethnicity, qualifications and professional memberships, confirmation of right to work in the UK, medical information, vehicle details, bank details, emergency contacts).

- Appraisd – data relating to your role, business unit, email address and managers is shared with Appraisd to set up your account. Information entered by you, your managers and feedback providers relating to your performance, training and development is stored on the system in order to monitor your performance and facilitate learning and development.

We will also share your information with other benefits providers as needed or requested by you.

We will share contact details with the following third parties; Interact (employee engagement and opinion surveys), and Survey Monkey (for example for feedback on training courses, policies etc). Any information you share in response to surveys and questionnaires will also be held on the sites.

Depending on your circumstances, from time to time, we may also share information with the following third parties; Health Partners (occupational health services), ECC and other coaching organisations (for parental transitioning and other coaching support), Posturite (work station assessment advice). It is possible that we may wish to share your data with other third parties and if that's the case, we will discuss with you in advance of any data being shared.

The third parties with whom we share your data are also subject to GDPR compliance requirements.

From time to time we are asked to share personal data with the Office for National Statistics (ONS) and Northern Ireland Statistics and Research Agency (NISRA). We are legally obliged to provide the data which is used for government monitoring. Information shared with the ONS and NISRA for individuals typically includes hours of work, salary and other remuneration data, pension details, role details.

The Equality Commission for Northern Ireland (ECNI) require Turley to gather information from co-owners working in Northern Ireland relating to community background. It is a legal obligation for Turley to ask for this information. The data is held on Turley records for the duration of employment. Overall numbers from different community backgrounds are shared with the ECNI, no names or identifying details are shared.

Where information is shared with third parties, we will seek to share the minimum amount of information necessary to fulfil the purpose.

How secure is my information with third-party service providers?

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

When might you share my personal information with other third parties?

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may share your personal information with our insurers if you have to make a work-related injury/accident claim. We may also need to share your personal information with a regulator or to otherwise comply with the law – potential recipients include HM Revenue & Customs, the Department for Work and Pensions, District Councils, and the Child Support Agency / Child Maintenance Service. From time to time we are asked to share personal data with the Office for National Statistics (ONS). We are legally obliged to provide the data which is used for government monitoring. Information shared with the ONS for individuals typically includes hours of work, salary and other remuneration data, pension details, role details.

For current and former co-owners, workers and contractors in Ireland, we may also share your personal information with providers such as PayCheckPlus, O'Leary Life, Zurich, Aviva, Optima Health, Travel Hub and Irish Revenue. However, please refer to the Privacy Notice: Co-owners, contractors, workers for Ireland for further information on this data sharing.

Transferring personal information outside the UK

In the course of carrying out the activities referred to above we may transfer your personal information to countries outside the UK, including to our office in Dublin.

Where personal information is being transferred outside of the UK, we will take steps to ensure that your data is adequately protected in accordance with Data Protection Act 2018, the UK GDPR and, if applicable, the EU GDPR. There are adequacy regulations in place in respect of Ireland. This means that Ireland is deemed to provide an adequate level of protection for your personal information.

Other than as set out above, we will not transfer any of the personal information you provide to us outside of the UK.

12. Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those co-owners, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so. Details of these measures may be obtained from Alison Browne (alison.browne@turley.co.uk) or Carol Maughan (carol.maughan@turley.co.uk).

13. Data retention

How long will you use my information for?

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. Details of retention periods for different aspects of your personal information are maintained in a separate document that is stored in our document management system and is available on request.

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 a co-owner, worker or contractor of Turley we will retain and securely destroy your personal information in accordance with our data retention procedures and this privacy notice.

14. 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 keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information

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

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. 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 (see below).

- **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 (for example, email marketing or phone calls).

- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

- **Object to any automated decision-making** about you which produces legal effects or otherwise significantly affects you.

- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Please be aware that these rights are subject to certain conditions and exceptions as set out in UK data protection law. 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 Alison Browne (alison.browne@turley.co.uk) or Carol Maughan (carol.maughan@turley.co.uk) in writing and they will explain any conditions that may apply.

No fee usually required

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.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

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 alison.browne@turley.co.uk or carol.maughan@turley.co.uk. 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.

Further guidance on your rights is available from the Information Commissioner's Office (*https://.ico.org.uk/*). You have the right to complain to the UK's supervisory office for data protection, the Information Commissioner's Office at *https://ico.org.uk/concerns/* if you believe that your data has been processed unlawfully.

15. Changes to this Privacy Notice

Alison Browne and Carol Maughan have been appointed to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact alison.browne@turley.co.uk or carol.maughan@turley.co.uk.

We reserve the right to update this privacy notice at any time for example if the law or regulatory requirements change, if technology changes or to make Turley's operations and procedures more efficient. We will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.