

# Clubs template privacy notice wording for employees <sup>1</sup>

*Drafting Note: This template is a specific privacy notice for employees and sets out the headings required under the GDPR. Clubs should use this template to create bespoke privacy notices for their own use, by using the headings and example text where appropriate by completing the text in square brackets.*

## What we need

[insert background information re club, such as structure, whether affiliated with any other organisations, for example, a SGB, etc.]

[insert name of club] will be a “controller” of the personal information that you provide to us as your employer.

### Option 1 – list categories of personal data

When you enter into a contract of employment with us, we will collect, store and use the following personal information relating to you:

- [contact details – name, address, email address, date of birth, number, etc.];
- [next of kin details – name, address, number, relationship, etc.];
- [payment details – bank account number, sort code, etc.];
- [details relating to education and training – degrees, qualifications, professional memberships, etc.];
- [experience details – previous roles, employers, references, etc.];
- [equality information – for example, disability, etc.]; and
- [insert any other personal information, for example, PVG membership, driving licence, previous offences, etc.].

We may ask you for additional personal information during the course of your employment, which shall be collected, stored and used in accordance with this privacy notice.

### Option 2 – reference to personal data collected in application or form

When you enter into a contract of employment with us, we will collect, store and use the personal information that you provided to us in your application form or CV. We may ask you for additional personal information during the course of your employment, which shall be collected, stored and used in accordance with this privacy notice.

## Why we need your personal information – contractual obligations

We need to process our employees’ personal information to perform our obligations as your employer under your employment contract. We will use our employees’ personal information to:

- [administer our payroll and report your earnings to HMRC];
- [manage our pension scheme by [insert details]]; and
- [maintain records on your performance at work, including any performance reviews and disciplinary proceedings]; and

- [insert any other uses of employees' basic personal data under the contract of employment].

### **Why we need your personal information – employment law**

We are under a legal obligation to process certain personal information relating to our employees for the purposes of complying with our obligations under employment law to process our employees' personal information to comply with our obligations as an employer.

### **Why we need your personal information – health and social care**

We may be required to process personal information relating to your health in order to assess your working capacity as an employee by [insert details].

### **Why we need your personal information – equality of opportunity or treatment**

[We are required to use our employees' personal information relating to your [health, racial or ethnic origin, etc.] for equality monitoring purposes.]

We will use this personal information to consider and provide any reasonable adjustments as required under the Equality Act 2010.

### **Who we share your personal information with**

[If your personal information is included in any images or videos taken by us at our competitions and events, we may share this with [insert name] for promotional and/or journalistic purposes].

We may be required to share personal information with statutory or regulatory authorities and organisations to comply with statutory obligations. Such organisations include [HMRC, the Health & safety Executive, Disclosure Scotland, and Police Scotland] for the purposes of safeguarding children and [insert any other purposes].

We may also share personal information with our professional and legal advisers for the purposes of taking advice.

[insert name of club] employs third-party suppliers to provide services, including [IT, payroll, etc.]. These suppliers may process personal information on our behalf as "processors" and are subject to written contractual conditions to only process that personal information under our instructions and protect it.

In the event that we do share personal information with external third parties, we will only share such personal information strictly required for the specific purposes and take reasonable steps to ensure that recipients shall only process the disclosed personal information in accordance with those purposes.

### **How we protect your personal information**

Your personal information is stored on our electronic filing system and our servers based in the [UK / EU] and is accessed by our [staff / volunteers] for the purposes set out above.

We are required to transfer your personal information outwith the EU for the purposes of [insert details]. Where your personal information is transferred outwith the EU, we will provide you with information regarding the safeguards that we have put in place with the recipient country to protect your personal information.

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

We will only keep your personal information for as long as necessary to comply with our employment law obligations and to safeguard [insert name of club] in the event of any claims, complaints, litigation, enquiries and investigations during or following the termination of your employment. We will review and possibly delete

your personal information following a period of at least [insert number] years after you have ceased to be employed with us.

We will keep certain personal information of employees for longer in order to confirm your identity, when you were an employee of [insert name of club] for [insert how long for]. We need to do this to [comply with our employment law obligations] or [in the event of a claim against [insert name of club]]

## Your rights

You can exercise any of the following rights by writing to us at [insert address / email address] [or by logging on to your account at [insert details]].

Your rights in relation to your personal information are:

- you have a right to request access to the personal information that we hold about you by making a “subject access request”;
- if you believe that any of your personal information is inaccurate or incomplete, you have a right to request that we correct or complete your personal information;
- you have a right to request that we restrict the processing of your personal information for specific purposes; and
- if you wish us to delete your personal information, you may request that we do so.

Any requests received by [insert name of club] will be considered under applicable data protection legislation. If you remain dissatisfied, you have a right to raise a complaint with the Information Commissioner’s Office at [www.ico.org.uk](http://www.ico.org.uk)

---

## Notes

- 1 This can be used by clubs within contracts of employment or provided to employees separately at the point of their employment commencing / collection of personal data.
- 2 There are specific requirements re this legal basis under the proposed UK Legislation. These requirements include (but are not limited to) that the club has procedures in place to comply with the data protection principles in relation to this legal basis and a retention policy for this personal data.

This template can also be amended for inclusion in job application forms / given to applicants upon receipt of CVs.

Updated: 21/04/2018