

The Conservative Party Headquarters, whose registered address is at 4 Matthew Parker Street, London SW1H 9HQ is registered with the UK Information Commissioner's Office (register number Z5909711). We value the privacy of those who provide personal information to us and ensure strong security applies to the handling of it from the application process onwards, with information available on a need-to-know basis only.

This privacy policy describes what personal information we collect about our current and former employees, contractors, non-staff and interns, how we use and otherwise process it, the basis upon which we process it, with whom it is shared, and how it is stored. This policy also describes other important topics relating to information privacy.

Please read this privacy policy carefully to understand how we handle your personal information. If you have any questions about this privacy policy, please contact our Data Protection Officer at [dataprotection@conservatives.com](mailto:dataprotection@conservatives.com)

## 1 INFORMATION COLLECTION

We may collect, store and use any of the following information about you and we refer to this as "personal information" throughout this policy;

- (a) your personal details:
  - (i) first name, maiden name and surname;
  - (ii) birth date;
  - (iii) home address;
  - (iv) proof of identification and address;
  - (v) home telephone number;
  - (vi) personal email address;
  - (vii) gender;
  - (viii) marital status;
  - (ix) race/ethnicity; and
  - (x) religious beliefs.
- (b) your family details:
  - (i) emergency contact information;
  - (ii) spouse or civil partner name;
  - (iii) spouse or civil partner contact information;
  - (iv) spouse's or civil partner's national insurance number;

- (v) names of dependents; and
  - (vi) co insured family members details.
- (c) documentation required under immigration laws:
- (i) citizenship details;
  - (ii) national identification number;
  - (iii) other documents required to show your right to live in the UK; and
  - (iv) residency and/or work permit and visa application and processes.
- (d) compensation/employment information:
- (i) current and former titles and positions held with us (and information about that position, including time spent in that position, supervisor, location of position, employee identification number, promotions, training records, overall work history, disciplinary actions, grievances, retirement eligibility, transfers);
  - (ii) identification search results, including employment searches, directorship searches, bankruptcy searches, media searches and criminal record checks;
  - (iii) current and historic compensation including benefits (base salary, discretionary bonus, pension contributions, life assurance, income protection, employee assistance programme, health insurance, childcare vouchers scheme, season loan tickets, taxes, eye tests, health assessments, loyalty awards, development days, collaboration days, maternity leave, paternity leave, parental leave, and sabbatical);
  - (iv) work contact information (phone number, postal address, mailing address, email address);
  - (v) performance reviews and information;
  - (vi) work place accident information, sickness/absence information and medical or health information (relevant to your employment and/or provided by you to HR, for example, medical assessments and occupational health reports);
  - (vii) working hours (overtime and shift work, hours worked, flexible working arrangements and department standard hours);
  - (viii) previous employment references; and
  - (ix) travel bookings and other expense claims, records and information.
- (e) payroll data:
- (i) bank details;

- (ii) working time records;
  - (iii) current compensation;
  - (iv) tax information; and
  - (v) ID related to payroll processing.
- (f) system and application access data: information required to access company systems and applications (such as system ID).
  - (g) talent management/resume/cv information: details contained in an application and resume/cv or otherwise provided to us, including previous employment background, professional qualifications, references, career development and skills analysis, training, departmental changes, performance and calibration details.
  - (h) management records: details of any shares of common stock or directorships that you may hold.
  - (i) CCTV footage.

Some of the personal information listed above comprises “special categories” of more sensitive personal information, which require a higher level of protection, for example, race/ethnicity information, religious beliefs and medical/health information. We do not request or gather any “special category” sensitive personal information regarding political opinions, philosophical belief, trade union membership or sexual orientation.

## 2 HOW WE COLLECT YOUR INFORMATION

We typically collect personal information about employees, contractors, non-staff and interns through our application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including [former employers, credit reference agencies or other background check agencies who may search social media for any expression of political views or behaviour that may bring the Party into disrepute].

We will collect additional personal information in the course of job-related activities throughout the period of you working for us.

## 3 USE OF INFORMATION

We collect, use and store your personal information for the following reasons:

- (a) to operate, support and centralise human resources administration and management (including but not limited to recruitment, payroll administration, employee administration, learning management, performance management and review, data storage, expense reporting and benefits management);
- (b) health and safety records and management;

- (c) security vetting, criminal records checks, pre-employment checks, credit checks and clearances (where applicable and allowed by law);
- (d) confirming information on resumes, CVs and covering letters, providing reference letters and performance reference checks;
- (e) staff management and promotions;
- (f) equal opportunities monitoring;
- (g) provision of staff information to HR service providers in the course of the provision of our services;
- (h) CCTV monitoring, staff building access cards and other security of company facilities;
- (i) ensuring adequate insurance coverage for our organisation;
- (j) ensuring adherence to internal policies and procedures to minimise the risk of security breaches and/or threats to our systems networks and data;
- (k) compliance with any procedures, laws and regulations which apply to us; and
- (l) establishing, exercising or defending our legal rights.

We will only process your personal information (to the extent that it is necessary) for the specific purposes listed above or for any other purposes specifically permitted by law, unless we reasonably consider that a new purpose is compatible with our original purpose. If we wish to process your personal information for any other purpose, we will notify you and explain the legal basis which allows us to do so, which we may do by updating this privacy policy in accordance with section 11.

#### **4 LEGAL BASES FOR USE OF YOUR PERSONAL INFORMATION**

We need to have legal bases for using your personal information for the purposes set out in this privacy policy. We consider that our legal bases are as follows:

- (a) our use of your personal information is necessary for the performance of our obligations under our contract with you (for example, to pay you or to confer a benefit under the terms of an employment contract); or
- (b) our use of your personal information is necessary for complying with our legal obligations, particularly as your employer (or prospective employer) (for example, providing your personal information to HMRC); or
- (c) where our use of your personal information is not necessary for the performance of our contractual obligations, or compliance with our legal obligations, it is necessary for the purposes of our legitimate interests or the legitimate interests of a third party (for example, to ensure a safe working environment, to ensure the reliability of our employees or to maintain adequate personnel records).

Where we are relying on our legitimate interests or the legitimate interests of a third party, we have explained, in the relevant parts of this privacy policy, what those legitimate interests are.

Where we collect and process more sensitive categories of personal information, for example health assessment information, racial/ethnic origin, religious beliefs or criminal background checks, we will only process such information:

- (a) where we need to in order to comply with our legal obligations as an employer or to exercise specific rights that we have as an employer; or
- (b) where you have given us your consent.

If we have asked for your consent to collect and use certain types of personal information, you may withdraw your consent at any time, by contacting the Data Protection Officer. You should be aware that it is not a condition of your contract with us that you agree to any request to consent from us.

## 5 DISCLOSURE OF PERSONAL INFORMATION

Your contact information will be made available to other employees and with HR services providers in the course of providing our services. This information includes your name, position, workplace telephone numbers, work addresses and email addresses, employee department, employee job title, employee photo and other miscellaneous position details.

We will share your personal information with the following categories of third parties:

- (a) other parties such as legal and regulatory authorities, accountants, auditors, lawyers; and
- (b) HR service providers, for example those that provide services to us such as:
  - (i) payroll and benefits providers;
  - (ii) pension providers;
  - (iii) insurance companies, including those providing medical health insurance, life assurance and group income protection;
  - (iv) human resources services, such as pre-employment checks and credit checks;
  - (v) information technology systems suppliers and support, including email archiving, back-up and disaster recovery and cyber security services; and other outsourcing providers, such as contract lease management, and off-site storage providers.

We will also disclose your personal information to third parties:

- (c) if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, any lawful request from government or law enforcement officials and as may be required to meet national security or law enforcement requirements or prevent illegal activity;

- (d) to enforce our contract with you, to respond to any claims, to protect our rights or the rights of a third party, to protect the safety of any person or to prevent any illegal activity; or
- (e) to protect the rights, property or safety of our employees or other persons.

Any third parties with whom we share your personal information are limited (by law and by contract) in their ability to use your personal information for the specific purposes identified by us. We will always ensure that any third parties with whom we share your personal information are subject to privacy and security obligations consistent with this privacy policy and applicable laws.

Save as expressly detailed above, we will never sell or rent any of your personal information to any third party.

## **6 RETENTION OF PERSONAL INFORMATION**

Conservative Campaign Headquarters collects and maintains personal information on current, former and prospective employees for legitimate purposes, such as processing payroll, collecting resumes to fill vacant positions and maintaining accurate benefits records.

We keep your personal information for no longer than necessary for the purposes for which the personal information is used or otherwise processed. The length of time we retain personal information depends on the purposes for which we collect and use it and / or as required to comply with applicable laws. For example, in the UK, payroll and wage records must be kept for six years.

## **7 AUTOMATED DECISION MAKING**

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention.

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.

## **8 YOUR RIGHTS**

You have certain rights in relation to your personal information. if you would like further information in relation to these or would like to exercise any one of them, please contact the Data Protection Officer to request that we:

- (a) provide you with a copy of any personal information which we hold about you;
- (b) update any of your personal information which is out of date or incorrect;
- (c) delete any personal information which we hold about you;
- (d) restrict the way that we process your personal information;
- (e) provide your personal information to a third party provider of services;
- (f) provide you with a copy of any personal information which we hold about you; or

- (g) consider any valid objections which you have to our use of your personal information.

We will consider all such requests and provide our response within the time period stated by applicable law. Please note however, that certain personal information may be exempt from such requests in certain circumstances, which may include if we need to keep processing your personal information for our legitimate interests or to comply with a legal obligation. We may request you provide us with information necessary to confirm your identity.

If you have any questions or concerns about our use of your personal information, please contact your HR representatives.

## 9 SECURITY

Conservative Campaign Headquarters is committed to protecting personal information from loss, misuse, disclosure, alteration, unauthorised access and destruction and takes all reasonable precautions to safeguard the confidentiality of personal information. Although we make every effort to protect the personal information which you provide to us, the transmission of information over the internet is not completely secure. As such, you acknowledge and accept that we cannot guarantee the security of your personal information transmitted to us over the internet that any such transmission is at your own risk. Once we have received your personal information, we will use strict procedures and security features to prevent unauthorised access.

Where we have given you (or where you have chosen) a password which enables you to access any account with us, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

## 10 THIRD PARTY WEBSITES

You may, from time to time, during your employment, access links to or other websites operated by third parties (e.g. training providers). Please note that this privacy policy only applies to the personal information that we collect from or about you and we cannot be responsible for personal information collected and stored by third parties.

Third party websites have their own terms and conditions and privacy policies, and you should read these carefully before you submit any personal information to these websites. We do not endorse or otherwise accept any responsibility or liability for the content of such third party websites or third party terms and conditions or policies.

## 11 CHANGES TO OUR PRIVACY POLICY

This privacy policy does not form part of any employee's contract of employment and we may amend it from time to time. Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our privacy policy.

## 12 FURTHER QUESTIONS OR MAKING A COMPLAINT

If you have any queries or complaints about our collection, use or storage of your personal information, or if you wish to exercise any of your rights in relation to your personal information please

contact the Data Protection Officer. We will investigate and attempt to resolve any such complaint or dispute regarding the use or disclosure of your personal information

You may also make a complaint to the UK information commissioner's office (<https://ico.org.uk/>), the UK's data protection supervisory authority. Alternatively, you may seek a remedy through local courts if you believe your rights have been breached.

The practices described in this privacy policy statement are current personal information protection policies, as of May 2018, updated 30<sup>th</sup> June 2022.

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