

Purpose - Our Colleague and Contractor Privacy Policy provides a summary of what information we collect, why we collect it and how you can update, manage and export your information

Privacy Policy



Summary

Your privacy is extremely important to us. We want you to know exactly what kind of information we collect about you and how we use it. This policy is intended to be clear, simple and easy to read. It applies to all employees, former employees, workers and contractors.

In this policy, “we” means Wm Morrison Supermarkets Limited and our group companies.

This policy does not form part of any contract of employment or other contract to provide services. We may update this policy at any time.

Key points

Your personal information

We collect personal information about you through our application and recruitment process, either directly from you or from an employment agency or background check provider. We will also collect additional personal information (related to your job) throughout the period you work for us. The types of information we will collect include (but are not limited to):

- Identity data (i.e. name, date of birth, marital status)
- Contact data (i.e. address, email address, phone number)
- Financial data (i.e. bank account details, payroll records, tax status)
- Contract and performance information (i.e. pre-employment checks, job title, performance reviews, disciplinarys)

- Special category (i.e. ethnic origin, religious beliefs, biometric information, trade union membership)

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. You must make sure that you keep your details up to date on the Morrisons People System.

How we will use your personal information

We will use your personal information in a number of different ways, but only when the law allows us to. When we use your data it will fall under the following categories:

- When we need to perform the contract we have entered into with you

- When we need to comply with a legal obligation
- When it is necessary for our legitimate interests (or those of a third party) and those interests are fairly balanced with your interests.

More details about how we will use your personal information are listed in appendix 1.

How we will use special category personal information

We recognise that some categories of personal data are particularly sensitive and have appropriate safeguards in place to control the way that we process special category personal data. We may process this type of personal information when we need to carry out our legal obligations, for activities in the public interest (such as equal opportunities monitoring) and in other circumstances with your explicit written consent.

Examples include:

- Information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws.
- 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.
- Information about your criminal convictions where it is appropriate given the nature of your role.

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- Information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.
- Trade union membership information to pay trade union premiums, record status as a trade union official and to comply with employment law obligations.
- Biometric information such as your fingerprint where this is used as a method of access to systems and buildings and where this is designed to prevent or detect crime.

How your consent affects your personal information

In the main we process your personal information to enable us to fulfil our contractual or legal obligations, and as such we don't require your consent to do this. In rare circumstances, we may seek your explicit consent to enable us to process certain types of special category data.

It is not a condition of your contract that you agree to any request for consent from us, and if we do make such a request we will provide you with full details of the information that we would require and why we would need it, so that you can carefully consider whether you wish to consent.

Data sharing

We share your personal information with third parties in certain situations such as when required by law, when it is necessary for our working relationship with you

or when we have a legitimate interest in doing so. Third parties includes third party service providers (including contractors and designated agents) and other entities within our group. In the main we share your personal information for the following reasons:

- Systems and software
- Contracts
- Benefits
- Security

We also share your personal information as part of our regular reporting activities on company performance in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data.

The third parties that we work with are required to protect your personal information in line with our policies.

We always have a contract in place with these third parties and do not allow our third parties to use your personal data for their own purposes. We only permit them to process your personal data for specific purposes in the way that we instruct them to.

We transfer the personal information we collect about you to the following countries outside the EU: India, USA, South Africa, Hong Kong, Jersey, Guernsey and the Isle of Man. We do this because it is necessary for our working relationship with you - i.e. we need to do this to pay you.

The security of your personal information

Our security measures are robust and designed to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way.

We ensure that your personal information is only shared with employees, agents, contractors and third parties who have a legitimate reason for processing it. Your personal information will only be processed on our instructions and anybody who processes your data on our behalf is subject to a duty of confidentiality.

How long we retain your personal information for

We 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.

Generally, we hold your personal data for the length of your employment with us plus seven years.

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Your personal information rights

Under certain circumstances you have the right to:

- Request access to your personal information
- Request correction of the personal information that we hold about you
- Request erasure of your personal information
- Object to processing of your personal information
- Request the restriction of processing of your personal information
- Request the transfer of your personal information to another party
- Withdraw consent at any time

If you want to exercise any of these rights you can email dataprotection@morrisonsplc.co.uk.

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. In rare circumstances, we may refuse to comply with one of the above requests. We would always clearly explain the reason why.

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

Data protection officer

If you have any questions about this privacy notice or how we handle your personal information, please contact the Data Protection Officer at dataprotection@morrisonsplc.co.uk.

If we are unable to resolve your concerns, you have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and 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.

Information

This policy has been authorised by the Group People Director.

We reserve the right to review, change or replace the content of this policy to reflect the changing needs of the business and/or to comply with new legislation.

Owner - Employee Relations
Last updated - 10/07/2023

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Appendix 1 : How we use your information

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

	The Purpose or Purposes	The legal reasons for processing
1	Recruitment Recruitment decisions, determining the terms on which you work for us, and completing checks to ensure entitlement to work	<p>Legitimate interests: the processing is necessary for Morrisons legitimate interests to ensure that we employ the most suitable people.</p> <p>Where this involves special categories of personal data, our processing relies on on our obligations and rights in the field of employment law.</p>
2	Fulfilling contracts Paying you, providing you with any additional benefits (including pensions) and administering the contract we have entered into with you	<p>Contract: the processing is necessary for a contract you have with us.</p>
3	Performance assessments Completing performance and salary reviews, considering training needs, ascertaining your fitness to work, making decisions about your continued employment and gathering evidence (including CCTV) necessary for possible grievance or disciplinary hearings	<p>Legitimate interests: the processing is necessary for Morrisons legitimate interests to ensure that we continue to employ the most suitable people.</p> <p>Where this involves special categories of personal data, our processing relies on our obligations and rights in the field of employment law and, in limited circumstances your explicit consent.</p>
4	Legal requirements Dealing with legal and regulatory issues involving you (or other employees) including accidents at work complying with health and safety obligations, equal opportunities monitoring	<p>Legal obligation: the processing is necessary for us to comply with the law for example to determine that we are complying with all employment laws (not including contractual obligations).</p> <p>Where this involves special categories of personal data, our processing relies on on our obligations and rights in the field of employment law.</p>
5	Security To monitor your use of our information and communication systems to ensure compliance with our policies, to prevent and/or to detect crime	<p>Legitimate interests: the processing is necessary for Morrisons legitimate interests to ensure that we continue to employ the most suitable people.</p> <p>Where this involves special categories of personal data, our processing relies on the substantial public interest in preventing or detecting criminal acts.</p>