COLLEAGUE PRIVACY NOTICE

1. Policy Summary

This is The Southern Co-operative Limited's (otherwise referred to in this policy as 'Southern Co-op', 'tSC', 'we' and 'us') Colleague Privacy Notice. We respect your privacy and are committed to protecting your personal data in accordance with data protection law, including the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 (DPA 2018) and the Data (Use & Access) Act 2025. This privacy notice tells you how we look after and process your personal data in relation to your prospective employment and employment with us.

2. Who we are

Full Name: The Southern Co-operative Limited

ICO registration: Z7498775

Address: 1000 Lakeside, Western Road, Portsmouth, PO6 3FE

We have appointed Bruce & Butler to act as our outsourced data protection officer ("DPO"). The DPO is responsible for overseeing data protection compliance within Southern Co-op questions. If you have any questions about this privacy notice, our use of your data or anything relating to the data we hold about you, please contact the DPO using the contact details below:

Email: dataprotectionofficer@southerncoops.co.uk

3. The Personal Data We Collect About You

Personal data, or personal information, means any information about an individual from which that person can be identified, or is identifiable. It does not include data where the identity has been removed (anonymised data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

Category of personal information	Description
Identity details	First name, last name, title, driving license, date of birth, national insurance number, passport, birth certificate, signature, image, biometric data (fingerprint), emergency contact details, next of kin details.
Contact details	Telephone number(s), email address(es), postal address(es), work address(es).
Tax details	Tax code, tax contributions P11D, P45, P60 forms

Salary details	Yearly salary or hourly wage, pension deductions, holiday pay, sick pay, maternity pay, remuneration package.
Bank details	Sort code, account number, account name, bank branch.
Leave details	Dates of absence, reason for absence (sickness, holiday, maternity, paternity, etc.)
Education details	School/college/universities attended, qualifications achieved, learning outcomes, test results.
Job details	Job description, CV, work history, references, contracted hours, department, start date, progression opportunities, work location, work relationship data.
Health details	Medical history, mental health details, disability details, all data concerning an individual's health.
Personnel details	Interview notes, performance reviews / appraisals, disciplinary proceedings, training, pay reviews, grievances, comments on specific situations.
Communication details	Feedback, questions, notes, any data that is contained within a message body or a subject from an individual.
Criminal details	Details concerning criminal convictions.
Technical details	IP address, browser type and version, cookies, details of website visits, Operating system, time zone and location.

4. How we collect your personal data

We will collect your personal data directly from you in the following ways:

- When you apply for a job role with Southern Co-op and provide your CV;
- When you complete new starter forms and provide your right to work in the UK;
- When you sign your employment contract with us;
- When you submit holiday/leave requests;
- When you provide us with a sick note; and
- When you correspond with us via email, text, telephone or post.

We will also collect personal data about you when we:

- Provide you with employee training;

- Refer you to occupational health;
- Conduct employee appraisals; and
- Conduct disciplinaries and grievances.

5. How We Use Your Personal Data

We are only allowed to process your personal data if we have a lawful basis to do so and are required to inform you of what that lawful basis is. We have set out in the table below: the purposes for processing your data, the categories of personal data affected, and the lawful basis on which we rely on when we process your personal data.

In some circumstances we can use your personal data if it is in our legitimate interest to do so, provided that we have told you what that legitimate interest is. A legitimate interest is when we have a business or commercial reason to use your information which, when balanced against your rights, is justifiable. If we are relying on legitimate interests, we have set that out in the table below.

Purposes for processing	Categories of personal data	Lawful basis for processing	Legitimate Interests (if applicable)
To conduct right to work checks on employees.	• Identity	• Legal obligation	N/A
To process your job application and determine role suitability.	• Identity • Contact • Job • Employment • Education • Equal Opportunities	• Performance of a contract	N/A
To monitor and administer your employment with tSC.	• Identity • Contact • Job • Education • Leave • Health • Salary • Bank • Tax • Equal Opportunities • Personnel	• Performance of a Contract	N/A
To administer payments to you in line with your employment contract and ensure payments are accurate.	• Identity • Contact • Bank • Tax • Salary	• Performance of a Contract	N/A
To provide employment benefits including	• Identity • Contact • Job	• Performance of a Contract	N/A

private medical cover.	• Salary		
To record health and safety incidents that occur while at work.	• Identity • Contact • Job • Health	• Performance of a Contract • Legal Obligation	N/A
To capture your image on our CCTV systems including body worn cameras, facial recognition and number plate registration.	• Identity	• Legitimate Interests	For your safety and for the prevention and detection of crime.
When colleagues clock in and out for shifts.	• Identity • Job	• Performance of a contract	N/A
To provide colleagues with online and in person training.	• Identity • Contact • Job • Education • Personnel • Technical	• Performance of a contract • Legal Obligation	N/A
When we capture your image to be included in marketing materials.	• Identity	• Consent • Legitimate Interests	To create effective marketing materials to support the business.
To send you relevant service emails and communications regarding your employment.	• Identity • Contact • Job	• Legitimate Interests	To ensure you are informed of updates and necessary communications effectively.
To provide with technical support when using approved Southern Co-op devices and systems.	• Identity • Job • Technical	• Performance of a contract	N/A

Special category data is personal data that is more sensitive by its nature. There will be circumstances where your special category data is required to be processed as part of your employment with Southern Co-op. Our special category condition for processing equal opportunities data is **Substantial Public Interest Conditions:** Article 9 (2)(g) of the UK General Data Protection Regulation (UK GDPR):

Your medical details are considered special category personal data under UK data protection legislation and as such, we must have a special category condition to process thisinformation. Our special category condition that we utilise for collecting medical details is **Health and Social Care**,

Article 9(2) (h). The processing is necessary for the assessment of the working capacity of the Team Member.

6. Disclosures Of Your Personal Data

We may have to share your personal data with third parties for the purposes set out in the table above. In order to administer our services and meet our legal obligations, we only share your personal data with third parties in the following circumstances:

- For the administration of IT management and support;
- For the administration of our HR portal;
- For the purpose of pre-employment checks such as references and background checks.
- To provide occupational health services;
- To administer employee benefits such as pensions, life insurance and healthcare;
- To provide external learning platforms;
- To manage and store your personal data;
- To administer payroll, benefits and pay expense receipts;
- To receive IT administration services, including CCTV and image capture services;
- To receive support from our professional advisors; and
- To meet legal obligations, for example, for the purposes of national security, taxation and criminal investigations.

If requested, we will share your personal data with authorities such as:

- The Police;
- The Health and Safety Executive;
- Local Authorities;
- Her Majesty's Revenue and Customs (HMRC);
- The Courts; and
- Central or Local Government Bodies.

Before we share your personal data with a third party, we will ensure that there is an appropriate Data Processing or Data Sharing Agreement in place to protect the sharing of data.

7. International Transfers

The EEA is the European Economic Area, which consists of the EU Members States, Iceland, Liechtenstein and Norway. If we transfer your personal data outside of the EEA, we must tell you and we must rely on one of the following:

- **Adequacy Decision:** The country we send your personal data to provides an adequate level of protection which has been approved by the European Commission.

- **Standard Contractual Clauses (with the IDTA Addendum):** The recipient of your personal data has provided us with signed Standard Contractual Clauses with the IDTA Addendum include. This holds the recipient accountable to safeguard the personal data.

- **International Data Transfer Agreement (IDTA):** The recipient of your personal data has provided us with a signed IDTA which has been approved by the Information Commissioners Office (ICO). This holds the recipient accountable to safeguard the personal data.

Currently there are no circumstances where your personal data may be transferred outside of the

EEA.

8. How do we protect your personal data?

We take the security of your personal data seriously. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Where we engage third parties to process personal data on our behalf, they do so on the basis of written instructions, are operating under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

9. Retention of your personal data?

We will only retain your personal data for as long as necessary to fulfil the purposes of our processing. This includes satisfying any legal, accounting, or reporting requirements.

When we assess the retention of your personal data, we will take the following into consideration:

- Nature of the information;
- Sensitivity of the information;
- Potential risks if the information was breached;
- The purpose(s) for which we initially processed the information;
- Whether we can achieve the purpose(s) through less invasive means; and
- Any applicable legal requirements.

Your employee records will be kept by us for the duration of your employment plus a minimum of seven years following termination. Further details of retention periods for different aspects of your personal data are available in our retention policies which where applicable you can request from us by contacting our Data Protection Officer on **dataprotectionofficer@southerncoops.co.uk**.

In some circumstances you can ask us to delete your data. See request erasure below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

10. Your Data Subject Rights

All individuals who engage with us have data subject rights relating to the processing of their personal data. These are the rights that apply to your personal data held within Southern Co-op:

- **The right to be informed** – you have the right to know what information we hold and process about you which is why we have provided this Privacy Notice.

- **The right of access** – you have the right to ask for a copy of the information we hold relating to yourself.

- **The right to rectification** – you have the right to ask for us to correct any information we hold which may be inaccurate or incorrect.

- **The right of erasure** – you have the right to have your personal data 'erased' in the following situations:

    - Where the personal data is no longer required for the purpose(s) for which it was originally collected or processed;
    - Where the processing was based on consent and you have withdrawn your consent;
    - When the personal data was unlawfully processed; and
    - When the personal data has to be erased in order to comply with a legal obligation.

- **The right to object** – you have the right to object to the processing of your personal data in the following circumstances:

    - The purpose of the processing activity is direct marketing;
    - Where the processing is based on legitimate interests; and
    - Processing for the purposes of scientific/historical research and statistics.

- **The right to restriction of processing** – you have the right to ask us to restrict the processing of your personal data in certain situations such as:

    - Where you contest the accuracy of your personal data, we will restrict the processing until you have verified the accuracy of your personal data;
    - When processing is unlawful, and you oppose erasure and request restriction instead; and
    - Where we no longer need the personal data, but you require the information to establish, exercise or defend a legal claim.

- **The right to data portability** – You have the right to request that we transfer your personal data to a third-party. This right only applies to automated personal data which you have either provided your consent for us to use or where we have used your personal data to perform a contract with you.

- **Rights in relation to automated decision-making including profiling** – you have the right to question decisions being made about you without any human involvement.

Should you wish to action one of your Data Subject Rights, please contact our DPO at dataprotectionofficer@southerncoops.co.uk

11. Changes to this Privacy Notice

We may update this Privacy Notice at any time, and we will provide you 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.

If you have any questions in relation to this notice, please contact our DPO at dataprotectionofficer@southerncoops.co.uk

12. Not happy?

You have the right to lodge a data protection complaint with us, should you be unhappy with the way we have processed your personal data. Should you wish to make a complaint, this can be done by contacting us in the following ways:

Email: dataprotectionofficer@southerncoops.co.uk
Phone:
Address:

If we receive a data protection complaint, we will respond to you within 30 days.

If you are not satisfied with our response, you also have a right to complain to the Information Commissioner's Office (ICO). You can find their contact details below. We would be grateful for the chance to deal with your concernsbefore you approach the ICO so please contact us in the first instance.

Address: Information Commissioner's Office,
Wycliffe House
Water Lane,
Wilmslow
Cheshire
SK9 5AF

Telephone: 0303 123 1113