

# Privacy Notice

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We take data protection seriously and this Privacy Notice explains how we use any personal information we collect about you.

## Who are we?

The company named on your employment contract is part of the PayStream My Max Holdings group. PayStream My Max Holdings has other subsidiary companies, one of which is PayStream Accounting Services Limited and that is the company that employs all its internal staff to administer and support your upcoming or existing employment. These companies are all part of the PayStream group of companies, which we refer to as 'us,' 'we' and 'PayStream' in this Privacy Notice.

## What personal information we need and why we need it

You will provide and confirm personal information to get you set up and employed by us. We need your personal information to manage this employment relationship and for us to discharge our legal and contractual duties as your employer. During your employment, we will continue to collect personal information about you which is relevant to your role and performance including but not limited to:

- Personal details, including name, address, nationality, gender, date of birth, bank details and National Insurance (NI) number;
- Contact details and preferences, including mobile, home and work phone numbers (where applicable);
- Statutory entitlements relating to annual leave, maternity, absences, pensions and salary sacrifice (where applicable);
- Legal requirements relating to your right to work in the UK;
- Contractual obligations relating to your pay (name, address, date of birth, national insurance (NI), bank details, gross to net pay, tax code), monitoring attendance (timesheets where applicable); compromise agreements and settlement payments (where relevant);
- Any employment disputes such as investigations, grievances, disciplines, performance data or safeguarding issues (where applicable);
- Start and termination of employment dates and assignment information;
- Health information, for example, medical certificates, risk assessments, Occupational Health or Access to Work records, accident at work records and pregnancy information (as applicable) to ensure that we are complying with our legal obligations (including but not limited to in respect of health and safety, performance/fit to work reviews, sick pay or duties under the Equality Act 2010) - See our Special Category Data policy for more information.
- Criminal records data may be processed as part of onboarding processes and/or, where necessary, in the course of employment to verify that candidates are suitable for employment or continued employment and to comply with legal and regulatory obligations to which we are subject)- See our Special Category Data policy for more information.
- All incoming and outgoing calls are recorded for quality, audit and training purposes;
- All incoming and outgoing emails that you send to us from a known email address are recorded for quality, audit and training purposes;
- Timesheet processing;
- We have an internal IT system we call 'CRM.' This logs your journey with Focused, from when you join, your payments and end of employment. Furthermore, internal staff also use this system to make notes. If for example, you call up with a pay query, we will record this activity on the system for quality and audit purposes;
- If you visit our website, we collect information about the Internet Protocol (IP) address of your device used to access the site. This helps us to monitor the level of activity and service we provide. You can find more information about this on our website.

Prior to your employment, in some cases, your recruitment consultant may have passed on your name and contact details so that we can contact you in respect of our employment offer. Alternatively, you may have contacted us directly, either via our website or otherwise. In order that we can get you set up quickly, we will call, text and email you reminders to join us and/or otherwise, to encourage you to accept our employment offer.

Where you do not join us, we will hold your personal information, for the purposes of our legitimate interests, in accordance with the following retention schedule:

- 3 months: the personal information that we hold about you will be deleted within 3 months where we attempt to contact you to discuss joining Focused, but you do not respond to our calls and emails or we do not provide an illustration of estimated take home pay.
- 9 months: the personal information that we hold about you will be deleted within 9 months where we've made contact with you to discuss Focused, have issued you with a log-in to join us but the application remains incomplete. We may contact you periodically within the 9 month timescale to re-offer our employment.

Where you do join our employment, we will hold your personal information, for the purposes outlined below, in accordance with the following retention schedule:

- We hold your personal information until the end of the 6th financial year following the end of your employment, apart from your personal bank details which we delete within 6 months after your employment end. In the rare instance we hold any special categories of personal data (such as medical information, or criminal record data) which we will retain this data for 6 months post-employment unless statutory or contractual requirements mean we must keep the records for longer.

We hold your personal information securely to comply with our legal and tax obligations, to deal with contract and insurance claims and to respond to any queries from recruitment businesses in respect of the funds paid for our services, for example overpayments. We also hold your data for this period to allow you to easily re-join us.

## How will we use the information about you?

There are different reasons why we collect, store and use the information we hold about you. These are:

- Compliance with a legal obligation: we need to process your information for tax and reporting purposes, and to provide statutory entitlements such as annual leave, pension, maternity, sick pay or flexible working and to ensure you have the right to work in the UK. There may also be legal requirements that we or you need to adhere to.
- We will check on your identity and use external databases to do this. For more information, please see the 'Who else sees your information?' section. Employers are legally obliged to check every employee has the right to work in the UK. Where a passport, or otherwise, does not grant the right to work in the UK, we will always ask for further documentation to support this. We will treat your right to work documentation with upmost care and provide it with appropriate safeguards for your fundamental rights and interests. Processing in this context is necessary for the purposes of carrying out obligations and exercising specific rights of Focused or of you in the field of employment and social security and social protection law in so far as authorised by data protection law.
- For the performance of a contract: we need to fulfil our contractual obligations, such as to pay you and in order to do so we may need to share your information with the recruitment business (or client where there is no recruitment business in the contractual chain); this may include exchanging information on hours worked, payments and tax deductions if it is necessary to fulfil our contract. We may also notify you from time to time of any contractual matters pursuant to your employment with us.
- In some circumstances, we may collect information about your health. For example, if you need special assistance working in your environment due to health issues, we will want to understand and record specific information about your health so we can make any reasonable adjustments. It will be necessary for us to record this to help us comply and demonstrate our employer obligations in the field of health and safety and employment law. It may also
- be necessary to hold this information as an audit trail to establish, exercise or defend legal claims. See our Special Category Data policy for more information.
- Our legitimate interests: we may, for instance, ask you to participate in surveys, although this will be voluntary. We use surveys, reviews and marketing tools to get your feedback and make continuous improvements to Focused. Disciplinary, grievance, redundancy, termination of employment may also be processed in line with this

reason, however it will depend on the circumstances and we may, for example, also rely on the performance of a contract or compliance with a legal obligation as our reason to process your information in this respect.

- In the unlikely event that you owe us money, we will take steps to recover our funds which may involve sending your information to an external debt collection agency. We currently use Hilton-Baird Collection Services Limited which is part of the Hilton-Baird Group. Furthermore, where you owe us money but we cannot locate you, we will send your name, contact details (phone and email), date of birth, National Insurance number and date of last contact (if any) to Global Investigations Limited for use of their tracing service.
- We may need to share information on your hours worked, payments and tax deductions with the recruitment business to demonstrate our compliance and/or in order to fulfil our contractual commitments with the recruitment business. In order to do this, we may be required to send a copy of your payslip to the recruitment business. We will do this securely so as to reduce the likelihood of any data breach.
- We will keep you informed of news which may affect your employment with us or that we think will improve our relationship. This may include, but not be limited to, enhancements to our portal or other IT capabilities.
- In respect of your entitlement to work in the UK (where applicable), if you hold a Biometric Residence Permit, we will check it using the Government's 'Check a Biometric Residence Permit' service. Where you have an outstanding appeal or application with the Home Office, an Application Registration Card or a Certificate of Application, we will check it using the Government's Employer Checking Service.
- We use an email and marketing automation provider called Adestra. For more information, see the 'Who else sees your information?' section below.

## Who else sees your information?

In certain circumstances, we may need to share your information with others. With whom we share your information and the reasons behind this are as follows:

- To comply with our legal obligations, we may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.
- If we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce or apply the employment contract, terms of use or other agreements; or to protect the rights, property, or safety of Focused, our employees, customers or others. This includes exchanging information with other companies and organisations for the purposes of the detection and prevention of crime (including financial crime and fraud), credit risk reduction, our insurance broker (Jelf Insurance Brokers Ltd. t/a Marsh Commercial, registered at 1 Tower Place West, Tower Place, London, EC3R 5BU) and insurance underwriters our debt collection agency (Hilton-Baird Group) and a tracing service from Global Investigations Limited.
- In order to verify your identity we use GB Group. This allows us to verify your data and register you quickly. The data you provide during the joining process on our portal 'ID Verification' page will be checked against a number of databases. Further information on these databases is found on the ID Verification page of the portal. Once joined, it is also available on your existing member portal under 'Useful Docs,' and on request.
- We will need to ensure you have the right to work in the UK and where you don't automatically have the right to work in the UK (for example, non EEA) and present entitlement to work documents to us, we will use those documents, and personal information held within the documents, to carry out relevant checks, including transferring personal information to the gov.uk website to check the validity of a biometric residence permit or use of the employer checking service (<https://www.gov.uk/check-biometric-residence-permit> or <https://www.gov.uk/employee-immigration-employment-status>) respectively.
- We may share your information with the recruitment business or other intermediary for which we hold a contract for the provision of your services for the purposes of compliance with the contract or any other legal obligation
- such as adherence to the Onshore Employment Intermediaries 2014 rules (section 44 of Chapter 7, Part 2 of ITEPA 2003).
- In the event that we sell or buy any business or assets, we may disclose your personal information to the prospective seller or buyer of such business or assets. If Focused or substantially all of its assets are acquired by a third party, personal information held by it will be one of the transferred assets.
- We use an email marketing software from Adestra Limited ("Adestra"). Adestra help us to manage and send out emails and marketing campaigns in an efficient, targeted, secure and easy way. It involves uploading your name, email address, the internal ID we have allocated you and employer name (our Umbrella company).

- My Max Rewards is operated by People Value Limited. For the purposes of this product, it trades as Remus Rewards. If and when you log-in to My Max Rewards, the information you supply goes to People Value Limited.
- We use Mimecast UK Limited to sanitise, secure and archive all inbound, internal and outbound emails. All emails undergo various best practices checks / processes and the content is scanned for malicious content / markers.
- We use Shred-IT Limited for document destruction services. They help ensure that client, employee and confidential business information is kept secure at all times. Visit <https://www.shredit.co.uk/en-gb/home> for more information.
- We use Microsoft Azure for document storage for certain types of documents (such as expense receipts, timesheet attachments, invoices/Credit notes & payslips). Azure is used for storage of these documents only. No additional data processing is performed. All documents will be stored in UK data centres and encrypted at rest. Sensitive documents will also have additional encryption. Visit <https://www.microsoft.com/en-gb/trust-center/privacy> for more information.
- An external company, Trustpilot A/S (“Trustpilot”), may contact you via email to invite you to review any services and/or products you received from us. We use Trustpilot to collect your feedback which means that we will share your name, email address and reference number with Trustpilot in order to collect your feedback and improve our services and products. If you want to read more about how Trustpilot process your data, you can find their Privacy Policy [here](#). We may also use such reviews in other promotional material and media for our advertising and promotional purposes.
- We use an external supplier, Ruler Analytics, who provide Marketing Analytics Software to us via the use of a tracking cookie on our website. The processing involves matching data (such as your name, email address or telephone number) with data that Ruler Analytics gather and store via the tracking cookie. The purpose of this processing is for Marketing Analysis to allow us to attribute generated revenue to each website channel. If you want to read more about how Ruler Analytics process your data, a copy of their GDPR Policy and IT Security policy can be provided to you on request.
- We use an online form filling software provided by Typeform to allow us to collect data and information from you which will be used to provide our services to you. From time to time we may ask you to provide data to us via Typeform, the data is input into Typeform by you, and is forwarded to us securely by Typeform so we can use this in the manner intended. You can read more about Typeform and their Privacy Policy here: [Typeform's terms, conditions & policies](#).

## Your rights

You have a number of rights in respect of your personal information. You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please email [info@focusedgroup.co.uk](mailto:info@focusedgroup.co.uk)

We want to make sure that your personal information is accurate and up to date. Please ask us to correct or remove information you think is inaccurate. We will only use your personal information as we have described in this Privacy Notice, but, in the unlikely event that we need to use it in a different way, we will provide you with an updated Privacy Notice.

Where we have based our processing on our legitimate interests, you do have the right to object to the processing or restrict us processing your information in this way. In this case, we will need to demonstrate to you that our legitimate interests are sufficiently compelling to override your interests or rights, or that purpose is to establish or defend legal claims.

You have the right to erasure, although this does not provide an absolute ‘right to be forgotten’ and applies only in these specific circumstances: where your personal information is no longer necessary in relation to the purpose for which it was originally collected/processed, you withdraw consent, you object to the processing and there is no overriding legitimate interest for continuing the processing, we unlawfully processed your personal information and, where your personal information has to be erased in order to comply with a legal obligation.

Where we have based our processing on the performance of a contract, you will have the right to receive this information from us in a structured, commonly used way and have the right to send this to someone else.

If you are unhappy with the way we use your personal information, you can make a complaint to us directly or to the Information Commissioner’s Office (ICO). You can visit this website: <https://ico.org.uk/concerns/>

## Changes to our Privacy Notice

We keep our Privacy Notice under regular review and should we change it, we will provide you with an updated copy.

## How to contact us

If you have any questions about our Privacy Notice or the information we hold about you, please contact [info@focusedgroup.co.uk](mailto:info@focusedgroup.co.uk)