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## Employee Privacy Notice

### Working at Bristows: Your personal data

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This Privacy Notice explains how Bristows (“we” or “us”) handles personal data about you when you work for us, whether as a permanent or temporary employee or as a contractor or consultant. It also provides details of the rights that you have under data protection law. For ease of reference we refer to the personal data Bristows handles about you in an employment context as “Employment Data”. The independent data controllers in respect of your Employment Data are Bristows LLP and Bristows (Services) Limited.

#### What personal information do we collect?

As your employer Bristows will collect various types of Employment Data about you so that we can fulfil the contract of employment we have with you and so that we can operate effectively as a law firm. The sorts of information we may collect are listed below:

- **Contact details**, such as your address, telephone number, email address, emergency contact details and, where relevant, details of your dependents and life assurance beneficiaries.
- **Financial information** relating to your benefits and pension arrangements, such as details of your salary and any deductions, allowances or bonuses, bank account details, tax codes, national insurance number, corporate credit card usage, travel expenses.
- **Recruitment information**, such as your CV, notes of interviews, application forms, decisions to offer employment, background information and third party references (if recorded), the results of a criminal records check (if applicable), and any relevant recruitment test results (if applicable).
- **Employment administration and career information**, such as employment and career history, photograph, termination details, health and safety records, sickness and/or absence records, accident reports, performance information (including your Development Review), disciplinary records, skills and experience records, training records, maternity details (if applicable), membership of professional bodies such as the SRA, and records of matters you have worked on.
- **Location information**, such as details of your whereabouts recorded by the office access systems.
- **Use of Bristows IT equipment and systems**, such as information about your use of the internet, our network, our computers, phones and other handheld devices, etc.
- **Equal opportunities monitoring information**, this is information that may **reveal race or ethnic origin, religious, political or philosophical beliefs**, or information that concerns gender, **health or sexual orientation**, may be collected, for example, so that we can understand the diversity of our workforce.
- **Other information** which you voluntarily provide in the course of employment that it is necessary for Bristows to use for our business purposes.

#### How do we collect employee data?

Typically, we will collect and receive Employment Data from you in the following ways:

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- Directly from you: For instance when you first apply to work at Bristows you will provide us with information about your previous experience and employers, when you use the Bristows employee self-service systems such as Cascade or BLife systems, you may provide information about sickness absence, or if you ask us to update your contact details (e.g. a change of address or name) you will provide us with the updated information so that we can log this on your HR record. We will also obtain information from you as you maintain your internal CPD record or Trainee diary review records for example.
- Indirectly from you: For instance when you attend an internal training course we will record this fact for CPD purposes or if you make a staff travel booking using the BNET and on-line travel booking system then we will receive a record of this.
- From third parties: For instance we may receive information about you from third parties in situations where a client provides a reference about you for one of the Legal Directories

### What will we do with your employment data?

As explained in section 1, Bristows uses Employment Data to operate our business and for the purposes of the employment relationship. In practice this means that your Employment Data will be processed by Bristows because it is necessary for one or more of the following purposes:

- Workforce Planning, for example, so that we can assign employees appropriately to different matters and so that we can conduct business forecasting and budgeting.
- General HR Administration, we will use Employment Data so that we can carry out the following tasks related to your contract of employment (together “HR Administration”): monitoring career development and performance, administering benefits, administering the payroll, obtaining management and employee satisfaction feedback (such as through the Listening Project), managing absences (e.g. sickness, parental leave and other family related and flexible working policies), conducting general headcount reporting, and emergency response planning, and equal opportunities monitoring.
- Performance of our Business Operations, for example, we will handle Employment Data so that Bristows can carry out its day to day business activities, allowing us to provide legal advice to our clients and to conduct business development and marketing initiatives.
- Security Management, for example, to ensure the security of Bristows’ offices and to make sure that our confidential client information and business assets are not compromised.
- Marketing, Advertising and Public Relations, for example, we may process your Employment Data so that we can display contact details and photographs of fee earners on the Bristows website, or other professional social media websites, such as LinkedIn. Such information may also be displayed in Bristows press releases and blogs.
- Legal and Regulatory Compliance, we will need to process Employment Data to ensure Bristows’ compliance with SRA regulatory requirements (for instance, we will need to provide details of all fee earners to the SRA) and health & safety law. There may also be other legal or fiscal obligations we are subject to, or where we need to handle Employment Data in connection with litigation or in connection with an internal investigation or audit to ensure compliance with our policies regarding anti-money laundering, bribery and corruption.

Bristows will only process your Employment Data where we have a legal basis for doing so. In the majority of cases this will be because it is necessary for us to do so in connection with your employment contract. In certain situations, however, Bristows may handle your Employment Data because it is necessary for our legitimate interests as a law firm, for example, where you sign up for a Bristows social event or a know-how session, provided that such processing does not result in a negative impact on your privacy and other rights, or based on your consent (which you have the right to withdraw). Bristows may also have a legal basis for

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processing certain categories of Employment Data because it is necessary for us to do so in order to comply with a legal obligation we are subject to. Again this will apply where we are subject to an SRA requirement.

### **Monitoring your use of Bristows IT Equipment and Systems**

We may monitor emails sent to and from our employees and other personnel. The information such emails contain (which may include personal data relating to third parties) may be used when investigating incidents. Although we endeavour not to review the contents of personal emails, there may be occasions in which this is necessary, for example, to investigate a breach of security or to investigate a disciplinary matter

### **Who is your employment data shared with?**

#### a) Inside Bristows

We share Employment Data within Bristows with those who have a “need to know” in relation to the information. For example, relevant Partners will have access to certain of your Employment Data for career development purposes and performance management, as well as budgetary-related purposes.

#### b) Outside Bristows

We share Employment Data with third party service providers, such as benefits providers, pension providers, health or retirement plan providers, training providers, and providers of market benchmarking services, as well as other third parties.

Generally, we will only disclose your Employment Data to our service providers. However, there will be some limited situations in which we share your Employment Data with other third parties. For example, where one of the following circumstances applies

- when we are required to do so by law;
- in response to a legitimate request for assistance by the police or other law enforcement or government agency;
- to seek legal advice from our external lawyers or in connection with a dispute with a third party;
- in connection with the sale, purchase or merger of a business; and/or
- to provide a third party (such as a potential client) with a means of contacting you for a legitimate business reason, for example, by providing your contact details, such as your business phone number and Bristows email address.

### **How long will we retain your employment data?**

We keep your Employment Data for as long as it is necessary in connection with the employment relationship we have with you. Further details may be found in our Data Retention Policy on the BNET.

### **Where do we store your employment data?**

From time to time, we may need to transfer your Employment Data to a country outside the European Economic Area (“EEA”) or UK, which have less strict, or no data protection laws than we do in the UK.

Whenever we transfer your Employment Data outside of the EEA or the UK, we will take legally required steps to ensure that appropriate safeguards are in place to protect your Employment Data and to make sure it is treated securely and in accordance with this Notice. You may contact us for a copy of the safeguards which we have put in place to protect your Employment Data and privacy rights in these circumstances.

### **Exercising your right?**

You may have the right to request access to, rectification or erasure of, the Employment Data we hold about you. You may also have the right to object to or restrict certain types of processing of your Employment Data and request to receive a machine-readable copy of the Employment Data you have provided to us. Please

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remember that you may access and update certain information about yourself in Cascade or BLife via self-service.

### Questions and more information

Please contact Human Resources if you would like to find out more about any matters relating to this Notice.

If you have concerns about the way in which we have handled your Employment Data you should contact Human Resources in the first instance. If you are still dissatisfied, you have the right to contact your Data Protection Authority. In the UK, the Data Protection Authority is the Information Commissioner's Office.

### Updates to this Notice

We may change this Notice from time to time in order to reflect changes in the law, regulatory guidance or our data privacy practices in compliance with the law. Where we do so, we will post the updated Notice on the BNET.

This Notice was last updated on **22 May 2018**