## thefutureworks Privacy Notice



#### What's in this notice?

- Information about us
- Scope
- How to contact us
- <u>Personal information we</u> collect about you
- How we collect your personal information
- How we use your personal information
- Your choices about the personal information you give us
- Profiling and automated decision making
- Who we share your personal information with
- <u>Sharing your personal</u> <u>information</u>
- How Long we keep your personal information
- Keeping your personal information secure
- How we may contact you
- Your rights

In this Privacy Notice, the terms "we", "our", and "us" refer to thefutureworks, a trading division of PeoplesFuture Limited, which is a wholly-owned subsidiary of <a href="The Coventry University Group">The Coventry University Group</a>. Coventry University Group is an umbrella term for Coventry University and all of the companies governed by Coventry University.

As a candidate of thefutureworks, your personal information will be processed by thefutureworks and may be shared with members of the Coventry University Group, thefutureworks employer clients and regulatory bodies.

#### Scope

This privacy notice gives you details about how thefutureworks process your personal data when you engage in our services and how it is shared.

We are a data controller of your personal information, which means we are responsible for looking after it. We will use your personal information fairly, lawfully and transparently, and according to the data protection laws.

This notice does not cover other organisations outside of Coventry University Group you provide personal information or where the information is shared with our employer clients and regulatory bodies. Those companies have their own privacy notices, so remember that the information you give them will follow their rules and not ours.





#### How to contact us

If you have any questions, comments, complaints or suggestions in relation to this notice, want to exercise your rights or have any other concerns about the way in which we use personal information about you, please contact the Information Governance Unit. You can email <a href="mailto:enquiry.igu@coventry.ac.uk">enquiry.igu@coventry.ac.uk</a> or write to the Information Governance Unit, Coventry University, Portal House, 163 New Union Street, Coventry, CV1 2PL, and a member of our dedicated team will respond to you.

Alternatively, you can contact our Data Protection Officer by writing to Data Protection Officer, Coventry University, Portal House, 163 New Union Street, Coventry, CV1 2PL or emailing <a href="mailto:dpo@coventry.ac.uk">dpo@coventry.ac.uk</a>.

We will do our best to help you with your query and/or resolve any issues. If you're still unhappy, you can contact the Information Commissioner's Office (ICO). Their website <a href="www.ico.org.uk">www.ico.org.uk</a> has details on how to <a href="contact the ICO">contact the ICO</a> or via their helpline on 0303 123 1113.



#### Personal information we collect about you

The type of personal information we collect about you and how we collect it can vary depending on your interactions with us.

Personal information means any information we hold about you from which you can be identified and which relates to you. It may include things like your name and contact details. Sometimes it may be necessary for us to collect more sensitive information such as ethnicity or health information (the legal term is special category data), and, in some circumstances, we may need to collect criminal offence data.

You can learn more about our collection and use of special category and criminal offence data by reading our specific Policy Document.

For more details about the personal information we collect about you, please look at the table in Schedule 2.



#### How we collect your personal information

We collect your personal information directly from you, other people or organisations.

Please see below for more information.

#### Information you give us

Information about you provided by you as part of your application process with thefutureworks, including where you complete forms (either in paper or online) as part of the work-seeking application process, completing forms during the onboarding process and ongoing records and compliance management

Information you provide us when you complete feedback forms or surveys and information in training documentation.

Information you provide to us when you engage with thefutureworks work seeking support services.

Information is provided as part of the performance and absence management process or connected with our grievance, disciplinary, whistleblowing, or other processes.

Information you provide when you fill in forms on our online portal or website, including where you register on our website or submit a query via our portal or website.

Page | 2 Last updated February 2023 Information you provide to us where you give information about yourself in any communications, either by telephone, email, post, social media or otherwise.

Information you give us when you are required to complete a Right to Work Check either as part of an in-person check, through a Digital identity verification technology check (IDVT) process via an Identification Document Service Provider (IDSP), or where a Home Office Share Code Check is applicable.

#### Information we collect about you

Details of your visits to our websites, portal including, but are not limited to, Internet Protocol (IP) address used to connect your computer to the internet, MAC addresses, traffic data, location data, your login information, time-zone setting, browser type and version, browser plug-in types and versions, operating system and platform, weblogs, cookies and other communication data, and the resources that you access. For more information, please see our Cookies Notice

Data including your name and images captured on body-worn cameras or CCTV when you visit one of our campuses or offices or in circumstances where we may meet you off-site. We may also collect personal data about you when we interact with you via Zoom, Teams or other similar communication platforms;

Information required for Digital identity verification technology check (IDVT) via an Identification Document Service Provider (IDSP), or a Home Office Share Code as part of Right to Work checks.

#### Information we receive from other sources

Information shared with us by external companies, such as hirers with whom we are engaged;

Information received by us from the Disclosure and Barring Service (where it is relevant and required by law to obtain information in relation to criminal offences and convictions);

Information shared with us for Digital identity verification technology check (IDVT) via an Identification Document Service Provider (IDSP), or a Home Office Share Code as part of Right to Work checks.

Information shared with us by the Police, the Criminal Records Agency, and other law enforcement agencies;

Information received by us from HMRC, Home Office or other government bodies to whom we owe a statutory duty;

Information shared with us by hirers providing feedback following interviews and assignments;

Information shared with us by current and former pension providers;

Information shared with us by other members of the Coventry University Group, as part of complaints or disciplinary process;

Information shared with us by other individuals or third parties who send us personal data about you, for example where a complainant refers to you in their complaint correspondence or whistle-blowers include information about you in their reporting to us;

Information shared with us by former employers, referees or former educational establishments when seeking a reference in respect of your application;

Page | 3 Last updated February 2023

#### How we use your personal information

We use your information in a number of different ways — what we do depends on the information.

We use your personal information in a variety of ways, for example:

- To provide work-seeking services as an Employment Business and Employment Agency
- To enable us to meet our legal and contractual obligations, as set out in the Terms of Engagement Contract for Services PAYE and other contracts;
- To enable us to pay you;
- To provide employment references;
- Monitoring and managing sickness and absence;
- Monitoring and managing performance;
- Monitoring of compliance with equality legislation;

We have to have a valid reason to use your personal information. It's called the "lawful basis for processing". The table in <a href="Schedule 2">Schedule 2</a> will provide you with more information about how we use your personal information and our reasons (lawful basis) for doing so.

#### Your choices about the personal information you give to us

We may use your personal information to send you direct marketing by post, phone, social media, email and text.

We can only use your personal information to send you direct marketing material if we have your permission or legitimate interest in doing so. We have given you the option to opt out of receiving such marketing materials.

If you don't want to receive emails or text messages from us, we'll provide you with the opportunity to opt-out, and you will be notified of this at the time you receive the communication.

This will not apply to emails, text messages, or any other communication methods we use to contact you as part of you engaging our work-seeking services.

#### Profiling and automated decision-making

We do not use profiling or automated decision-making to process your personal information.



## Who we share your personal information with

We will share your personal information within thefutureworks with potential hiring employer clients engaging thefutureworks in the provision of work seeking services and organisations that are providing their services to us, such as payroll or where we are legally obliged, i.e. regulator. In addition, it is shared as permitted or required by law, on a considered and confidential basis and with a range of external organisations.

Your personal information may be shared with other organisations outside of thefutureworks. Please see <u>Schedule 3</u> for further information about who we share your personal information.

We may engage third parties to provide processing activities where it is necessary, and we have a reason (a lawful basis) to do so. We require that all third parties who process personal data on our behalf treat it according to applicable data protection laws. We do not allow our third-party service providers to use your personal data for their own purposes but only to process it for specified purposes and according to our instructions. Such processing is to be conducted under a formal agreement, which includes provisions around the processing of personal data, and which provides appropriate safeguards.



Sharing your personal information outside of the UK

Page | 4

To manage our relationship with you, it is sometimes necessary for us to share your personal information outside the UK.In these circumstances, sharing your personal information is subject to special rules under UK data protection law. Whenever we share your personal information outside of the UK, we shall ensure that:

- We will only transfer your personal information to countries that have been deemed to provide an adequate level of protection for personal information by the UK Government. Currently, the UK Government recognises EU and EEA member states as having adequate levels of protection for personal information, as well as those other countries currently recognised by the European Commission as having such adequate protections; and
- Where we use certain service providers or partners who are based in countries which the UK Government does
  not deem to have adequate levels of protection for personal information, we may use specific contracts
  approved by the UK Government which give personal information the same protection it has within the UK, EU
  and EEA.

Please contact us at <a href="mailto:enquiry.igu@coventry.ac.uk">enquiry.igu@coventry.ac.uk</a> if you would like further information about the specific mechanism used by us when sharing your personal information outside of the UK.

We keep our mechanisms for transferring personal data outside of the UK and/or the EEA under regular review to ensure that these are in line with UK data protection laws.



### How long do we keep your personal information?

We only hold your personal information for as long as we do the activities we told you about or have a valid reason to keep it. We consider a number of factors in deciding how long to keep your information:

- The nature and sensitivity of the information.
- The potential risk of harm from unauthorised use or disclosure of the information.
- The purposes for processing the information and how long it will take to achieve those purposes.
- How long it is reasonable to keep records to show we have met the obligations we have to you and by law.
- Any time limits for making a legal claim.
- Any periods for keeping information set by law or recommended by regulators, professional bodies or associations.
- Any relevant legal proceedings that apply.

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 data indefinitely without further notice to you.

If you want more information about how long we keep your information, please contact the Information Governance Unit via <a href="mailto:enquiry.igu@coventry.ac.uk">enquiry.igu@coventry.ac.uk</a>.



## Keeping your personal information secure

We employ appropriate security measures to prevent information from being accidentally lost, used, or accessed unlawfull.

We publish an Information Technology Policy that describes how IT is governed. We underpin the Policy with additional protective controls and standards and work with our suppliers and partners to embed security by design.



How we may contact you

Page | 5

Please note that we may contact you by post, email, telephone, text, social media, or any other suitable electronic method in connection with the purposes set out above. We'll never contact you to ask for your account password.

# Your rights in relation to your personal information

It is your personal information, so we need to make you aware of your rights and how to exercise them.

Your rights	What this means for you
Access	The right to be provided with a copy of your personal information (subject access request)
	To request your data, please complete the Data Subject Rights Request form available <a href="here">here</a> .
Rectification	The right to require us to correct any mistakes in your personal information. This enables you to have any incomplete or inaccurate data that we hold about you corrected, although we may need to verify the accuracy of the new personal data that you provide to us.
	To request your data to be rectified, please complete the Data Subject Rights Request form available <a href="here">here</a> . Please note that we may not always be able to comply with your request for rectification, for example, where the request relates to an opinion. In some cases, we may still retain the historic data or audit trails to demonstrate the changes made to your data.
Erasure	The right to require us to delete your personal information, in certain situations.
	To request your data to be rectified, please complete the Data Subject Rights Request form available <a href="here">here</a> . Please note that we may not always be able to comply with your request of erasure for specific reasons, which will be notified to you, if applicable, at the time of your request.
Restriction of processing	The right to require us to restrict the processing of your personal information in certain specific circumstances, e.g. if you contest the accuracy of your personal information.
	To make a request for your data to be rectified, please complete the Data Subject Rights Request form available <a href="here">here</a> .
To object	The right to object:
	<ul> <li>at any time to your personal information being processed for direct marketing (including profiling);</li> </ul>
	—in certain other situations to our continued processing of your personal information, e.g. processing carried out for the purpose of our legitimate interests. In some cases, we may demonstrate that we have a compelling reason to continue to process your personal information, despite any objection, as is necessary for our public interest tasks, the exercise of an official authority vested in us, or for our legitimate interests or those of a third party which override your rights and freedoms.
	If you wish to exercise your right to object, please complete the Data Subject Rights Request form available <a href="here">here</a> .

Data portability	In certain situations, the right to receive the personal information you provided to us in a structured, commonly used and machine-readable format and/or transmit that personal information to another organisation.  To request your data to be provided in a commonly used format, please complete the Data Subject Rights Request form available <a href="here">here</a> .
Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including profiling) produces legal effects concerning you or similarly significantly affects you. We do not currently use tools which involve automated decision-making.
Withdraw consent	Where we rely on consent to process your personal information, you may withdraw that consent at any time. You will be provided with information on how to withdraw consent when it is collected from you.
Right to complain	If you are concerned about how we have processed your personal information, you can complain to the Information Commissioner's Office (ICO). Please visit the ICO's website <a href="https://co.org.uk">www.ico.org.uk</a> for further details, or you can use their online tool for reporting concerns: <a href="https://ico.org.uk/concerns/">https://ico.org.uk/concerns/</a>
	Please be aware ICO requires an organisation's internal complaints process to be exhausted. For details on how to submit a complaint to us, please see our Data Protection Complaints Procedure available on our website at <a href="https://www.coventry.ac.uk/gdpr-and-data-protection/key-contacts/">https://www.coventry.ac.uk/gdpr-and-data-protection/key-contacts/</a>

If you wish to exercise any of your rights or would like any further information, please send a written request to the Information Governance Unit, Coventry University, Portal House, 163 New Union Street, Coventry, CV1 2PL or email <a href="mailto:dsar@coventry.ac.uk">dsar@coventry.ac.uk</a>.

#### **Changes to this privacy notice**

We reserve the right to update this privacy notice at any time, and we will make an updated copy of such privacy notice available on thefutureworks website and online Portal

## Schedule 1

This privacy notice applies to the processing of your personal information by:

Entity	ICO Registration Number	When your personal information might be processed
Coventry University ( or a named subsidiary within Coventry University Group)  Priory Street Coventry, United Kingdom CV1 5FB	Z6939585	Where you are a candidate (this is inclusive of students) engaging the thefutureworks for work seeking opportunities for a position within Coventry University (including any other subsidiary within Coventry University Group), your data shall be processed for employment purposes and in line with Coventry University Employees, Workers and Consultants Privacy Notice and Coventry University Students Privacy Notice or where the processing is required for the performance of the contract or legal obligation.
PeoplesFuture Limited ("thefutureworks")  Priory Street Coventry, United Kingdom CV1 5FB	ZA333567	Where you engage with thefutureworks for work seeking opportunities as a hirer or worker.

Schedule 2 - The table below provides further details about the information we collect about you.

egory Description Why description (type of data this includes)	o we process this information	Lawful basis (legal justification)
	o we process this information  For the purpose of being registered for work seeking services.  To identify suitable employment opportunities.  To process and evaluate your skills and employment history for the merits of any applications and vacancies.  To complete right to work checks as required by law.  To contact you to discuss any vacancies.  To arrange registration for interviews with you.  To submit your details, such as CV, to potential employers/hirers.  To process timesheet details submitted via portal which will allow us to pay your wages as a temporary agency worker (where they are paid through PeoplesFuture Ltd t/a thefutureworks).  To record your hours worked and data for the production of payroll.  To keep a record of the reference details you submit to us.  To respond to any enquiries you make or feedback you leave.  Where you complete a survey that we use for research purposes, we will retain the information you provide in response to that survey. Where your survey response includes identification and	

Data category	Description	Why do we process this information	Lawful basis
	(type of data this includes)		(legal justification)
		<ul> <li>We may use your identification and contact data, technical and/or usage data to form a view on what we think you may be of interest to you and, in doing so, we will only send you information that is deemed relevant to you.</li> </ul>	Contract or Legitimate Interest
		<ul> <li>To monitor how our website is used, including information regarding the number of visitors to the various parts of the website, and to help us improve the content of the website and customise its content or layout for you. We collect this information in a way that does not identify you and we do not make any attempt to find out the identities of those visiting our website.</li> </ul>	Legitimate Interest
		<ul> <li>If you contact us to report a fault with our website, we will use the information provided for the purposes of rectifying that fault.</li> </ul>	Legitimate Interest
		<ul> <li>If you exercise your rights under the Freedom of Information Act, Environmental Information Regulation or Data Protection Act. All correspondence and relevant documents/information shall be recorded and kept in line with our policies.</li> </ul>	Legal Obligation
		<ul> <li>If you report a personal data breach or raise a complaint, we will record and keep a record of the correspondence and relevant documents/information in line with our policies.</li> </ul>	Legal Obligation
		<ul> <li>Hirer, recruitment partners, suppliers, or any other third party working with thefutureworks, the personal data shall be collected, stored and used in line with any agreements and arrangements between us: performing a contract we have entered or wish to enter with you, where we need to comply with a legal obligation, where we need to protect your (or someone else's) interests or for official purposes.</li> </ul>	Contract
			Legitimate Interest

Data category	Description (type of data this includes)	Why do we process this information	Lawful basis (legal justification)
		<ul> <li>To enable us to contact others in the event of an emergency (we will do this based on the presumption that you have checked with the individuals before you supply their contact details to us).</li> </ul>	Legal Obligation
		<ul> <li>To the Police or other regulatory and/or law enforcement agencies where pursuant to the investigation or disclosure of a potential crime or national security matters such as Benefits or Tax Inspectors, UK Visas &amp; Immigrations and the Foreign and Commonwealth Office</li> </ul>	Legal Obligation
		<ul> <li>To the Home Office and other international and national governmental and regulatory bodies in connection with the assessment of the immigration status of candidates</li> </ul>	Legal Obligation
		To liaise with you pension providers	Legal Obligation
		<ul> <li>To Her Majesty's Revenue and Customs for the purposes of tax reporting and as required by legislation</li> </ul>	Contract and Legitimate Interest
		<ul> <li>Providing management information and testing functionality of our systems developments</li> </ul>	Contract and Legal Obligation
		To enable us to meet our legal and contractual obligations, as set out in the terms of employment and other contracts	

Data category	Description	Why do we process this information	Lawful basis
	(type of data this includes)		(legal justification)
Health Data	<ul><li>Medical Conditions</li><li>Sickness event</li></ul>	Monitoring employment attendance, sickness and absences	Contract
	Disability Data	<ul> <li>The processing is necessary to inform family or next of kin and emergency services where there is an emergency situation such as illness or serious injury</li> </ul>	Legal Obligation or Legitimate Interest
		<ul> <li>Details relating to statutory payments applicable within scope of an agency worker;</li> </ul>	Contract and Legal Obligation
		The processing is necessary for assessment of any potential adjustments that may be required to be implemented by the hirer.	Contract and Legal Obligation  Please see appropriate policy document
Equality and Diversity Data	<ul> <li>Racial or Ethnic Origin</li> <li>Sexual Orientation</li> <li>Gender Identity Data</li> <li>Religious or philosophical beliefs/ associations</li> </ul>	To monitor our compliance with equality legislation and to ensure equality of opportunity in employment/engagement with hirers encouraging diversity, and to provide appropriate support.	Legal obligation  Please see appropriate policy document
Political Affiliation Data	Trade Union Membership	As described for Collective Agreements in the Employment Code of Conduct Regulations	Legal obligation Please see Appropriate Policy Document
Criminal Record Data	Criminal offences and convictions	To carry out thefutureworks obligations in assessing an individual's suitability for employer client and its business sectors/vacancies criteria, and where certain positions will require a DBS check to be carried out as part of the requirement of undertaking the role, which will provide us with details of both unspent convictions and relevant spent convictions.	Contract and Legal obligation  Contract and Legal
		thefutureworks may hold and process data about criminal offences and convictions as we are required to assess suitability to work	obligation

Data category	Description	Why do we process this information	Lawful basis
	(type of data this includes)		(legal justification)
		seeking purposes. thefutureworks would have collected information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you or a third party, such as the Police in the course of you working as an agency worker.	Please see Appropriate Policy Document
Image Data	<ul><li>Photographs/Stills/Digital Images</li><li>Proof of right to work</li></ul>	Scans of passports or other identification documents with your image on as required for right to work checks.	Legal Obligation
		<ul> <li>To support the marketing and the promotion of thefutureworks (to promote thefutureworks by using photographic images on our website, in our prospectus and in other promotional material).</li> </ul>	Consent
		<ul> <li>Where we use video conferencing and communication software such as Microsoft Teams or Zoom you may be asked to provide your name (first name and surname), email address, phone number (optional) and profile picture (optional).</li> </ul>	Contract
Monitoring Data	<ul> <li>CCTV data</li> <li>Body worn cameras</li> <li>IT Usage data for example, email usage, browser history</li> <li>Login / Logout records</li> <li>Location tracking data</li> </ul>	<ul> <li>We use this information to assess compliance with thefutureworks policies, standards and procedures.</li> <li>To monitor your use of our information and communication systems to ensure compliance with our IT policies and to ensure network and information security including preventing unauthorised access to our computer and electronic communication systems and preventing malicious software distribution.</li> </ul>	Contract  Legal Obligation And Legitimate Interests
		<ul> <li>To ensure health and safety of our staff and to prevent and detect crime including, for example, by processing CCTV images. Signs are in place to indicate where cameras are in use. In addition to being used for the prevention and detection of crime and as part of our efforts to keep our sites safe and secure, CCTV or body worn camera footage may also be used in the course of disciplinary proceedings.</li> </ul>	Legal Obligation

Data category	Description (type of data this includes)	Why do we process this information	Lawful basis (legal justification)
Financial Data	<ul> <li>Payroll / Salary Data</li> <li>Bank Account details (Sort Code &amp; Account No.)</li> <li>Deduction Data relating to deductions made from an individual's salary such as pension, tax deductions, attachment of earnings.</li> <li>Expenses</li> </ul>	<ul> <li>To process payment of hours claimed for work completed, , routinely via a timesheet process submitted via thefutureworks portal, or an alternative manner acceptable to the business, which will allow us to pay your wages as a temporary agency worker (where they are paid through PeoplesFuture Ltd PAYE, thefutureworks division). The portal facilitates the recording of hours worked and data for the production of payroll and holiday accrual</li> <li>To pay your wages as a temporary agency worker (where they are paid through PeoplesFuture Ltd t/a thefutureworks).</li> </ul>	Contract and Legal Obligation  Contract and Legal Obligation
Candidate Management Data	<ul><li>Performance Data</li><li>Training Data</li></ul>	<ul> <li>Undertake performance reviews.</li> <li>Updating your candidate record of any training courses you have completed.</li> </ul>	Contract Contract

Employment Data	<ul> <li>Employment History refers to an individual's history of employment.</li> <li>Career Data refers to an individual's personal information regarding their career.</li> </ul>	To support job applications and verification of previous employment history.	Contract
Dispute and Grievance Data	<ul><li>Complaints Data</li><li>Disputes Data</li></ul>	<ul> <li>Administration of complaints, investigations and disciplinary proceedings concerning candidate or hirer grievance or misconduct, including investigations in accordance with the regulations and procedures.</li> </ul>	Contract or Legitimate Interest
		<ul> <li>Whistleblowing concerns raised by you, or to which you may be a party or witness.</li> </ul>	Legal Obligation
Testimonial Data	<ul><li>Survey Data</li><li>Testimonials</li></ul>	<ul> <li>Personal information (not anonymised) provided by candidates or hirers as part of providing testimonials (in writing, video or other formats), completing surveys or questionnaires.</li> </ul>	Contract or Consent
Reporting Data	<ul><li>Statutory returns</li><li>Internal and external audits</li></ul>	Making statutory or external returns to governmental or regulatory bodies.	Legal obligation
		<ul> <li>Providing disclosures of personal information to support internal and external audits.</li> </ul>	Contract and Legal Obligation

#### **Schedule 3**

#### Who we share your information with

The Police and other crime prevention and detection agencies for crime prevention or detection purposes;

Hirers and employers which we identify and provide your details for the purpose of work-seeking services

The Home Office, including UK Visas and Immigration, UK embassies, local authorities and other government bodies for the purpose of complying with our obligations to the Visa and Immigration Service and any successor to it;

Government agencies pursuant to a valid request and where required by the law;

Pension providers engaged by us in order to comply with our employment obligations to you;

Government-certified Identification Document Service Provider (IDSP), or Home Office as part of Right to Work checks.

Reasonable adjustments where this is necessary where this is available, for the purposes of assessing your working capacity as an agency worker. the ability or capacity to work in a given role

Her Majesty's Revenue and Customs for the purposes of tax reporting and as required by legislation or as may be in our legitimate interests;

External third-party bodies for statistical reporting purposes;

Future employers, where you request that we provide a reference for you;

Next of kin (emergency contact individual) and family members in an emergency situation;

Third parties engaged in providing services to us;

Third parties engaged by us in carrying out investigations or conducting disciplinary/grievance meetings and making decisions, or witnesses who are required to give evidence as part of such processes;