



## GDPR Privacy Notice

(for employees, workers and subcontractors)

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|--------------|----------------|----------------|--------------------------------------------------------------------------------------|------------------|
| POL039       | Mhairi Shields | Mhairi Shields |  | 24 August 2026   |

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## 1. What is this notice?

This is the GDPR Privacy Notice of Venesky Brown. Our contact details are:

4A Rutland Square  
Edinburgh  
EH1 2AS

Telephone: 0131 357 2140

Email: [info@venesky-brown.co.uk](mailto:info@venesky-brown.co.uk)

As an employer Venesky Brown must meet its contractual, statutory and administrative obligations. We are committed to ensuring that the personal data of our employees, workers and subcontractors is handled in accordance with the principles set out in the General Data Protection Regulation (GDPR).

This privacy notice explains what to expect when Venesky Brown collects personal information about you. This notice should be read in conjunction with our GDPR and Data Retention Policies. When appropriate we will provide a 'just in time' notice to cover any additional processing activities not mentioned in this document.

## 2. Who does this notice apply to?

This notice applies to all current and former employees, agency staff, workers and subcontractors. This notice also applies to Limited Company Contractors that we engage with. However, the information we will process about you will vary depending on your specific role and personal circumstances.

This notice does not form part of your contract, and we may amend the notice at any time.

## 3. Data protection queries

If you have any questions about this privacy notice or how we handle your personal data, please contact Mario Holligan, our Data Protection Manager (DPM) at [GDPR@venesky-brown.co.uk](mailto:GDPR@venesky-brown.co.uk).

## 4. The kind of information we hold about you

Personal data means any information about an individual from which they can be identified. It does not include data where the identity has been removed (anonymous data). We will collect, store and use the following categories of personal data about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth
- Gender
- Marital status and dependents
- Next of kin and emergency contact information
- National Insurance number

- Bank account details, payroll records and tax status information
- Salary, annual leave, pension and benefits information
- Start date
- Location of employment or workplace
- Copy of driving licence if applicable
- Recruitment information – including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process
- Employment records – including job titles, work history, working hours, training records and professional memberships
- Compensation history
- Performance information
- Disciplinary and grievance information
- CCTV footage
- Photographs

We may also collect, store and use the following “special categories” of more sensitive personal data:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Trade union membership
- Information about your health, including any medical condition, health and sickness records
- Information about criminal convictions and offences
- Disclosure information

## 5. How is your personal data collected?

We typically collect personal data about employees, workers and subcontractors through the application, recruitment or engagement process, either directly from individuals or sometimes from our client or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background agencies.

We will collect additional personal data in the course of the services you provide to us throughout the period you provide services to us.

If, under the contract you have agreed with us, you have the right to send a substitute or engage hired assistants, we may need to collect some personal data relating to the substitute/assistants you choose to send, for health and safety purposes and to ensure the substitute/assistant has the necessary skills and expertise to provide the services. Where this is the case, we will notify you at the time.

## 6. How we will use information about you

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

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

- Where we need to comply with a legal obligation
- Where it is necessary for our legitimate interest (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal data in the following circumstances, which are likely to be rare:

- Where we need to protect your interests (or someone else's interests)
- Where it is needed in the public interest or for official purposes.

## 7. Situations in which we will use your personal information

We need all the categories of information in the list above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases, we may use your personal data to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal data are listed below:

- Making a decision about your recruitment or appointment
- Determining the terms on which you work for us
- Checking you are legally entitled to work in the UK
- Paying you and, if you are an employee, deducting tax and national insurance contributions
- Liaising with your pension provider
- Administering the contract we have entered into with you
- Business management and planning, including accounting and auditing
- Conducting performance reviews, managing performance and determining performance requirements
- Making decisions about salary reviews and compensation
- Assessing qualifications for a particular job or task, including decisions about promotions
- Gathering evidence for possible grievance or disciplinary hearings
- Making decisions about your continued employment or engagement
- Making arrangements for the termination of our working relationship
- Education, training and development requirements
- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work
- Ascertaining your fitness to work
- Managing sickness absence
- Complying with health and safety obligations
- To prevent fraud
- To monitor your use of our information and communication systems to ensure compliance with our IT policies
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution
- To conduct data analytics studies to review and better understand employee retention and attrition rates
- Equal opportunities monitoring

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

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

## 8. Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 9. Special categories of personal data

'Special categories of personal data' means information about your racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; health; sex life or sexual orientation; criminal convictions, offences or alleged offences; genetic data; or biometric data for the purpose of uniquely identifying you.

### 9.1 How we use particularly sensitive personal data

"Special categories" of particularly sensitive personal data require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal data in the following circumstances:

- In limited circumstances, with your explicit written consent
- Where we need to carry out a legal obligation
- Where it is needed in the public interest, such as for equal opportunities monitoring
- Where it is needed to assess your working capacity on health grounds subject to appropriate confidentiality safeguards.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

### 9.2 Our obligations as an employer

We will use your particularly sensitive information in the following ways:

- We will use information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws
- We will use 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

- We will use information about your race, national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting
- We will use trade union membership information to pay trade union premiums, register the status of a protected employee and to comply with employment law obligations.

### 9.3 Do we need your consent?

We do not need your consent if we use special categories of your personal data in accordance with our written policy to carry out our legal obligations or exercise specific rights. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

## 10. Information about criminal convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided, we do so in line with our Data Protection Policy.

Less commonly, we may use information relating to criminal convictions where necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We may also process such information about members or former members in the course of legitimate business activities with the appropriate safeguards.

## 11. Sharing your personal information with third parties

We may share your personal data with the following third parties if this is required by law; necessary to enter or carry out our contract with you or administer the working relationship with you; where we have another legitimate interest in doing so; or where it is necessary to protect your vital interests or those of another person:

- JK Business Services Limited (Payroll and Accountancy services)
- CB Escala Ltd (Payroll and Accountancy services)
- Agilla Ltd (IT services)
- HiBob (HR system)
- Legal advisers
- Benefit providers
- Our clients – in accordance with providing working finding services
- Banking providers
- Intermediary service suppliers including umbrella companies and commercial contractors
- Health professionals and occupational health providers involved in your care.

- Potential or actual purchasers of the business, or other third parties in the context of a possible sale or restricting of the business
- For business promotion we may share details of your name, work location, job title and photographs of you
- Any person specified by you, where you ask us to provide data to that person
- Other third parties as necessary to comply with the law e.g. HMRC and Health and Safety Executive

All our third-party service providers and other entities are required to take appropriate security measures to protect your personal data in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 12. Automated decision making

We do not envisage taking any decisions about you based solely on automated processing (i.e. without human involvement), which have a legal or similarly significant effect on you.

## 13. Transferring your personal data outside the United Kingdom

We may transfer your personal data outside of the UK. If we do, you can expect a similar degree of protection in respect of your personal data.

## 14. Data security

We have put in place measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way. In addition, we limit access to your personal information to those employees, agents, contractors and third parties who have a business need to know and are subject to a duty of confidentiality.

We have put procedures in place to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## 15. Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it, including to satisfy any legal, accounting or reporting requirements.

You can find details of how long we will retain your personal data for in our Data Retention Policy.

## 16. Your rights

You have the following rights:

- **Access:** you have the right to ask us for copies of your personal data.

- **Correction:** you have the right to ask us to correct information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Deletion:** you have the right to ask us to erase your personal data in certain circumstances.
- **Objection:** you have the right to object to the processing of your data in certain circumstances.
- **Restriction:** you have the right to ask us to restrict the processing of your personal data in certain circumstances.
- **Transfer:** you have the right to ask that we transfer the data you gave us to another organisation, or to you, in certain circumstances.

You will not usually have to pay a fee to access your personal data (or exercise any of your other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

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

## 17. Right to withdraw consent

In the limited circumstances where you have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact Mario Holligan. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

## 18. How to complain

If you're unhappy with how we've handled your personal data, we'd like the chance to put things right. Please contact us by phone on 0131 357 2140 in the first instance, so that we can try to resolve your complaint informally.

If you're not satisfied at this stage, please contact our Quality Manager, Lindsey Gatherer, at [lindsey@venesky-brown.co.uk](mailto:lindsey@venesky-brown.co.uk). Alternatively, you can write us at 4A Rutland Square, Edinburgh, EH1 2AS. Full details of how we handle complaints are set out in our Complaints Policy.

You also have the right to complain to the Information Commissioner's Office (ICO) at any time, although we would appreciate the opportunity to resolve your concern directly first. The ICO's details are as follows:

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

Helpline number: 0303 123 1113

## 19. Privacy notice review

This privacy notice will be monitored by the HR team and reviewed annually. 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 changes. We may also notify you in other ways from time to time about the processing of your personal data.