

# Fair Processing Notice for Employees and Contractors

**This fair processing notice is applicable to all current and former employees and contractors employed within all subsidiary companies within the Isle of Man.**

Praxis is committed to protecting the privacy and security of your personal information.

This fair processing notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the Isle of Man Data Protection Act 2018 (the Isle of Man Data Protection Law).

All organisations active in the European Union (EU) will need to comply with the General Data Protection Regulation (GDPR) in addition to local data protection law. This privacy notice is therefore designed to ensure compliance with both the Isle of Man Data Protection Law and the GDPR.

It applies to all employees and contractors.

This fair processing notice should be read in conjunction with the Praxis Fair Processing Notice available here [www.praxisgroup.com/fair-processing-notice](http://www.praxisgroup.com/fair-processing-notice)

PraxisIFM Trust Limited and Praxis Group Services (IOM) Limited collectively referred to as Praxis, as your employer is a "data controller". Praxis can be contacted at 4<sup>th</sup> Floor, Exchange House, 54/58 Athol Street, Douglas, Isle of Man, IM1 1JD. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this fair processing notice.

Praxis' Human Resources Function supports the organisation's business objectives by effectively managing its people.

The HR Function comprises:

- > Day to Day Employee Cycle (see mainline list below)
- > Performance, Reward and Incentivisation
- > Culture and Values
- > Reporting Analytics
- > Reward and Benefits
- > Talent Management and Succession Planning
- > Learning & Development
- > Group Structure and Job Evaluation/Profiling
- > Policies and Procedures
- > Recruitment (see Candidate fair processing notice)

The controller acknowledge that all processing of personal data must be lawful, fair and undertaken with transparency. Appendix A (please see below) explains all of the processing which is being undertaken within the HR function for the purposes set out above.

The controller has implemented a strict protocol across their respective services within the HR function which ensures personal data is not retained, past the point in time when the purpose for which the personal data was collected and processed has been carried out. Where the relevant controller no longer considers there to be a lawful or legitimate basis to retain personal data, this information will be erased or destroyed in a safe and secure manner. For employees and contractors this will be six years after you cease being an employee or contractor of Praxis.

Praxis has a professional relationship with a third party supplier, Clarity, SIGMA, Sage etc., who provide support to and carry out maintenance on the IT infrastructure and systems for the organisation. For these third parties to carry out the function they are contracted to provide, there will be instances where they may have sight of your personal data.

The HR Function will only provide third parties with access to your personal data where there is a legitimate and lawful purpose for this access to be given in line with the Isle of Man Data Protection Act 2018 (the Isle of Man Data Protection Law) and our internal policies and directives.

Your personal data may also be shared with the Internal Audit function of Praxis as may be required for the completion of their relevant functions.

## APPENDIX A

HR Function	Personal Data	Purpose of Processing	Lawful Basis
Employee Life Cycle	<p>Basic personal data</p> <p>Identity data</p> <ul style="list-style-type: none"> <li>&gt; Full name, maiden name, marital status, title, date of birth, passport, GY code and Population Management identification number.</li> <li>&gt; Age and job role/title.</li> <li>&gt; Performance data</li> <li>&gt; Qualification data</li> </ul> <p>Financial data</p> <ul style="list-style-type: none"> <li>&gt; Salary information</li> <li>&gt; Start date</li> </ul> <p>Contact data</p> <ul style="list-style-type: none"> <li>&gt; Current and previous postal address, email</li> </ul>	<p>Identity data</p> <ul style="list-style-type: none"> <li>&gt; This personal data is provided by the data subject and is processed in connection with their employment with Praxis.</li> <li>&gt; This personal data is also used for the notification of certificated sickness, which is required under the terms of employment.</li> <li>&gt; This personal data is held on the data subject's personnel record and may be used when reviewing certain employment matters either specific to the individual or across the organisation. This may include promotion, disciplinary or grievance action, salary reviews and compensation, and contract termination</li> </ul> <p>Financial data</p> <ul style="list-style-type: none"> <li>&gt; This personal data is contained within the data subject's contract of employment and processed by HR delivery to monitor the financial elements of their employment and progression.</li> <li>&gt; This personal data is held on the data subject's personnel record and may be processed when carrying out a review of individual salary and/or salaries across the organisation. For the latter this information will be processed in a manner where salaries are collated into groups of employees, rather than being attributed to specific individuals, in order to maintain the data subject's privacy to the best extent possible in these circumstances.</li> </ul> <p>Contact data</p> <ul style="list-style-type: none"> <li>&gt; This personal data is collected directly from the data subject and is processed for the purpose of</li> </ul>	<p>The processing is necessary for the conclusion or performance of a contract.</p> <p>The processing is necessary for complying with applicable laws, regulations or other legal duties</p> <p>The processing is necessary for a health or social care purpose and is undertaken by a person who in the circumstances owes a duty of confidentiality</p>

	<p>address, former addresses and telephone numbers.</p> <ul style="list-style-type: none"> <li>&gt; Next of Kin</li> </ul> <p>Special category data</p> <ul style="list-style-type: none"> <li>&gt; Health data</li> <li>&gt; Criminal data</li> <li>&gt; Gender</li> </ul>	<p>corresponding with the data subject on matters relating to their employment.</p> <ul style="list-style-type: none"> <li>&gt; This personal data is also processed to ensure that annual leave entitlement is calculated correctly, sickness payments and other employment payments are processed.</li> </ul> <p>Health data</p> <ul style="list-style-type: none"> <li>&gt; This personal data is also processed to ensure that annual leave entitlement is calculated correctly, sickness payments and other employment payments are processed.</li> <li>&gt; This special category data is provided by the data subject, or their line manager, and processed for the purpose of the assessment of the working capacity of the data subject and for monitoring and processing information relating to absence from work due to sickness.</li> <li>&gt; This special category data is provided by the data subject, via their line manager, and processed for the purpose of sickness benefit recoveries.</li> <li>&gt; This special category data is provided by the data subject to enable Praxis to provide individuals who have a disability with the same opportunities and to make any reasonable adjustments</li> </ul> <p>Criminal data</p> <ul style="list-style-type: none"> <li>&gt; This special category data is provided by the data subject and processed in accordance with the pre-employment check regarding the completion of a DBS check which states the data subject's previous convictions.</li> <li>&gt; This data is used if a criminal conviction occurs during employment that impacts the terms of the employment contract.</li> </ul> <p>Gender</p> <ul style="list-style-type: none"> <li>&gt; This data is used for gender pay gap reporting.</li> </ul>	
Pensions	<p>Basic personal data</p> <p>Identity data</p>	<p>Identity data</p> <ul style="list-style-type: none"> <li>&gt; This personal data is provided by the data subject and processed in</li> </ul>	<p>The processing is necessary for the conclusion or</p>

	<ul style="list-style-type: none"> <li>&gt; Full name, maiden name, marital status, title and date of birth</li> </ul> <p>Financial data</p> <ul style="list-style-type: none"> <li>&gt; Bank account data and pensions information.</li> <li>&gt; Contact data</li> <li>&gt; Current and previous postal address, email address, former addresses, and telephone numbers. -</li> </ul> <p>Special Category data</p> <ul style="list-style-type: none"> <li>&gt; Health Data</li> </ul>	<p>order to facilitate the calculation and/or payment of pension benefits.</p> <p>Financial data</p> <ul style="list-style-type: none"> <li>&gt; This personal data is provided by the data subject and processed to facilitate the payment of pension benefits.</li> </ul> <p>Contact data</p> <ul style="list-style-type: none"> <li>&gt; This personal data is provided by the data subject, or their authorised representative, and processed to ensure that pension benefits can be paid to the correct individual.</li> </ul> <p>Health data</p> <ul style="list-style-type: none"> <li>&gt; This special category data will be provided by the data subject, their line manager or Occupational Health and may be processed if ill health retirement is being considered for the data subject. Pensions will require sight of Occupational Health's recommendations on such matters and potentially other medical documentation to undertake this process</li> </ul>	<p>performance of a contract</p> <p>The processing is necessary for a health or social care purpose and is undertaken by a person who in the circumstances owes a duty of confidentiality</p>
Payroll	<p>Basic personal data</p> <ul style="list-style-type: none"> <li>&gt; Identity data <ul style="list-style-type: none"> <li>● Full name, maiden name, marital status, title and date of birth</li> </ul> </li> <li>&gt; Financial data <ul style="list-style-type: none"> <li>● Bank account data and salary information</li> </ul> </li> <li>&gt; Contact data <ul style="list-style-type: none"> <li>● Current and previous postal address, email address, former addresses and telephone numbers.</li> </ul> </li> </ul>	<p>Identity data</p> <ul style="list-style-type: none"> <li>&gt; This personal data is provided by the data subject and processed so that monies relating to salary, wages or occupational pension can be paid to them.</li> </ul> <p>Financial data</p> <ul style="list-style-type: none"> <li>&gt; This personal data is provided by the data subject and processed to ensure that payments can be made to the employee or occupational pensioner</li> </ul> <p>Contact data</p> <ul style="list-style-type: none"> <li>&gt; This personal data is provided by the data subject, or their authorised representative, and processed to ensure that pay advices can be issued and contact can be made in the event of a pay query.</li> </ul>	<p>The processing is necessary for the conclusion or performance of a contract;</p>

If you have any questions about this fair processing notice, please contact [privacy.iom@praxisgroup.com](mailto:privacy.iom@praxisgroup.com)

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