

PRIVACY POLICY - Employees, Job Applicants & Contractors

1 Who are we?

We are GB Bank Limited, formally known as The Model T Finance. Our data protection registration is ZA503192, which is renewed annually.

GB Bank is the data controller and has overall responsibility for your personal data (collectively referred to as "we", "us" or "our" in this privacy policy).

We have appointed a data protection officer, DPO, who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your information rights, please contact our DPO using the details set out below.

2 Purpose

GB Bank (GBB) is committed to protecting the privacy and security of your personal data.

GBB is a 'data controller' as defined by UK data protection legislation. This means that we are responsible for determining how we collect, hold, and use your personal data.

This privacy policy describes how we collect, hold, and use your personal data during and after your working relationship with us. It applies to current and former employees, job applicants, temporary staff, associates, and contractors. This notice does not form part of any contract of employment or other contract to provide services.

It is important that you read this policy, together with any other privacy policy we may provide on specific occasions when we collect or process your personal data, so that you are aware of how and why we are using your personal data.

3 Data protection principles

We comply with current UK data protection legislation which states that the personal data we hold must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

4 Personal data

4.1 The data we collect about you

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

Some data is considered particularly sensitive because of the serious impact that it might have on the individual concerned if the data was lost or stolen. For this reason, we will provide a higher level of protection for this 'special category' data.

We will process the following types of categories of personal data as part of the GBB recruitment process, this includes when you send us your CV for any future positions:

- **Identity data** such as date of birth, photograph, gender, marital status, next of kin and Emergency contact information.
- **Contact details** such as name, title, addresses, telephone numbers, and personal email addresses.
- **Recruitment data** such as nationality, entitlement to work in the UK, qualifications, work history, experience, references, and DBS checks.
- **Employment data** such as the terms and conditions of your employment, start and finish dates, salary or fee payments, benefits, pension, work patterns and place of work, National Insurance number, attendance, holidays, sickness, disciplinary or grievance issues, disabilities and information about your driving licence and insurance documents (if you drive on company business).
- **Financial data** such as bank account details, payroll records, tax status information.
- **Performance data** such as performance reviews, performance development plans and training.
- **Technical data** such as your login data.
- **Activity data** such as activity logs for our IT systems and databases.
- **Communications data** such as the emails you send or receive via our email system.

We may also process hold or use special category data that is specific to information about your health, including any medical condition, health and sickness records and criminal conviction data, gathered as a result of your DBS check.

4.2 How we use your personal data

We will only use your personal data when we have a valid legal basis to do so. Most commonly, we will use your personal data in the following circumstances:

- In the performance of the contract, we have entered into with you.
- In order to comply with a legal obligation.
- When we have a legitimate interest (or a third-party has a legitimate interest) and your data privacy rights do not override those interests.

We may also use your personal data in the following situations:

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

4.3 Situation in which we will use your personal data

We have indicated the purpose or purposes for which we are processing, or will process, your personal data, the categories of data involved and the lawful basis for processing. We may process your personal data using more than one lawful basis.

Purpose/Activity	Type of Data	Lawful Basis
Recruitment	<ul style="list-style-type: none"> • Identity • Contact • Recruitment • Criminal offence data (result of DBS) • Special category data: Race, Ethnicity, Health 	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary to comply with a legal obligation • Necessary for our legitimate interests
Employment	<ul style="list-style-type: none"> • Identity • Contact • Recruitment • Employment • Financial • Performance • Technical • Communications • Special category data: Race, Ethnicity, Health 	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary to comply with a legal obligation • Necessary for our legitimate interests e.g., monitor equal opportunities or contact your next of kin in an emergency.
Marketing	<ul style="list-style-type: none"> • Images • Quotes • Biographies • Work contact details 	<ul style="list-style-type: none"> • Necessary for our legitimate interests. • When we have obtained your consent.
Business planning including use of data analytics and equal opportunities monitoring	<ul style="list-style-type: none"> • Recruitment • Employment • Performance • Special category data: Race, Ethnicity, Health 	<ul style="list-style-type: none"> • Necessary for our legitimate interests
To protect the security of commercial and personal and special category data in our care by securing and monitoring activity within our network, internet, and email	<ul style="list-style-type: none"> • Identity • Technical • Usage • Activity • Communications 	<ul style="list-style-type: none"> • Necessary for our legitimate interests • Necessary to comply with a legal obligation
To monitor your use of our information and communication systems to ensure compliance with our IT policies	<ul style="list-style-type: none"> • Identity • Technical • Usage • Activity • Communications 	<ul style="list-style-type: none"> • Necessary for our legitimate interests

To safeguard you and for the prevention and detection of crime.	<ul style="list-style-type: none"> • Images only (CCTV - entering and exiting GB Banks premises) 	<ul style="list-style-type: none"> • Necessary for our legitimate interests
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4.4 If you fail to provide personal data

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).

4.5 Change of purpose

We will only use your personal data for the purpose(s) 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 explain the legal basis which allows us to do so.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

4.6 How we use special category data

We only collect, hold, and use special category data when we have a specific requirement for such data and a lawful basis to do so. GBB will implement additional safeguards to ensure the data is kept secure and free from unauthorised access. We process special category data in the following circumstances:

- In order to carry out our legal obligations or exercise our rights in connection with your employment such as using health data to ensure your health and safety in the workplace and assess your fitness to work, provide appropriate workplace adjustments, monitor, and manage sickness absence and administer benefits.
- Where it is in the public interest to collect, hold and use special category data, such as the use of race and ethnic origin data in equal opportunities monitoring and reporting or the use of health data in relation to an occupational pension scheme.

We may also process special category data 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.

In limited circumstances, i.e., not a condition of your contract of employment with us, we may be required to request your written consent to process a special category of data. If and when this occurs, we will advise you of the special category of data we would like to process and a detailed explanation of what it will be used for. This is to help you make an informed decision about consenting for us to use your data in this way.

4.7 Information about criminal convictions

We only collect information about criminal convictions if it is appropriate given the nature of your role and where we are legally able to do so. We will collect this information during the recruitment process, this will be sourced directly from yourself or through the Disclosure and Barring Service check, DBS, we conduct as part of the recruitment process.

- We may also collect this data directly from you, during the course of our working relationship.

- We will use information about criminal convictions and offences in the following ways.
 - Making a decision about your recruitment or appointment.
 - Making decisions about your suitability to perform your role for all customer or third-party activities.
 - Making decisions about your continued employment or engagement.
 - Making arrangements for the termination of our working relationship.

4.8 Automated decision making

Automated decision-making takes place when an electronic system uses personal data to make a decision without human intervention, such as a recruitment aptitude test which uses pre-programmed algorithms and criteria.

For automated decision-making which may have a legal or similarly significant effect on individuals then we will only progress under the following circumstances:

- Where it is authorised by law such as for the purposes of fraud or tax evasion.
- Where it is necessary to perform a contract with you and appropriate measures are in place to safeguard your rights.
- In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

If we seek to use special category data within an automated process, we will only do so under the following circumstances: -

- With your explicit consent; or
- When processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard your fundamental rights and interests.

We will notify you in advance if we intend to use your personal data in an automated decision-making process. We will also provide you with information in relation to the automated decision making, for example:

- The categories of data that will be used in the decision-making process.
- Why these categories are considered pertinent.
- How any profile used in the automated decision-making process is built, including any statistics used in the analysis.
- The envisaged consequences of such processing.

We will notify you of the result of the automated decision making and also provide you with information on how to:

- Obtain an explanation of the decision reached after such assessment.
- Express your point of view in relation to the automated decision.
- Request that a human reconsider the decision made by the automated process.

5 Data sharing

We may share your data with third parties, including third-party service providers. We require third parties to respect the security of your data and to treat it in accordance with the law.

Where data is transferred outside of the UK, we take steps to ensure that appropriate measures and controls are in place to protect that data in accordance with relevant data protection regulations or EU Standard Model Contracts.

5.1 Why might you share my personal data with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

5.2 Which third-party service providers process my personal data?

'Third parties' includes third-party service providers who we refer to as data processors (i.e., contractors and designated agents). The following activities are carried out by third-party service providers:

- Payroll and pension administration.
- IT services (such as for email and collaboration tools).

5.3 How secure is my data with third-party service providers?

All our data processors are required to take appropriate security measures to protect your personal information in line with the requirements of the Data Protection Act 2018 and the UK GDPR. We do not allow our data processors 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.

5.4 Will you share my data with other third parties?

We may share your personal information with other third parties who are considered separate data controllers, i.e., a regulator or other organisations in order to comply with the law.

6 Data security

We have put in place measures to protect the security of your data. Details of these measures are available upon request.

We have put in place appropriate organisational and technical security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors, and other third-party data processors who have a business 'need to know'. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality. Details of these measures may be obtained from the Data Protection Officer (DPO), dpo@thegbb.co.uk.

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

7 Data retention

7.1 How long will we retain your personal data?

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

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. At the end of the appropriate retention period, your personal data will be securely disposed of in accordance with our data retention policy.

In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case we may use such data without further notice to you.

All data relating to unsuccessful candidates will be retained for 6 months as will CVs sent to us for future vacancies.

8 Right of access, correction, erasure, and restriction

Your personal data is retained until the purpose for its collection and processing has been met, at which point it will be securely destroyed.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your working relationship with us.

8.1 Your rights in connection with personal data

Under certain circumstances, by law you have the following rights in relation to your data:

Right of access	Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
Right to rectification	Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected.
Right to erasure	Request of your personal data. This enables you to ask us to delete personal data where there is no legal basis for continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below.)
Right to object	Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal data for direct marketing purposes.
Right to restriction	Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data, for example if you want us to establish its accuracy or the reason for processing it.
Right of portability	Request the transfer of your personal data to another party.
Right to object to automated decision making	You have the right not to be subject to automated decision-making and can require that any such decisions are reviewed by a human.

8.2 Submitting a request

If you wish to exercise any of these rights, please contact our DPO by email, dpo@thegbb.co.uk, or by post to:

Data Protection Officer
PO Box 147
Innovation House Coniston Court
Blyth Riverside Business Park
BLYTH
NE24 9FX

You will not normally have to pay a fee to exercise any of these rights, however, we may charge a reasonable fee if your request is repetitive, or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We will always try to respond to any legitimate request within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case we will notify you of this and keep you updated.

8.3 What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the data (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.

8.4 Right to withdraw consent

In circumstances when you have provided your consent for GB Bank to process your personal data you have the right to withdraw your consent at any time. To withdraw your consent please contact the DPO on dpo@thegbb.co.uk.

Once we have received notification that you have withdrawn your consent, we will no longer process your data for the purpose or purposes you originally agreed to.

9 Data protection officer

We have appointed a DPO to oversee compliance with this privacy policy. If you have any questions about this privacy policy or how we handle your personal information, please contact the DPO by email to dpo@thegbb.co.uk or by post to:

Data Protection Officer
PO Box 147
Innovation House Coniston Court
Blyth Riverside Business Park
BLYTH
NE24 9FX

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK's independent body set up to uphold information rights <https://ico.org.uk/make-a-complaint/>.

10 Changes to privacy policy

We reserve the right to update this privacy policy at any time. We may also notify you in other ways from time to time about the processing of your personal data.

This privacy policy was last updated November 2023.