

GDPR: DATA PRIVACY NOTICE FOR CUSTOMERS AND SUPPLIERS

Made To Order Limited are committed to protecting and respecting your privacy.

This policy and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR").

1. Definitions

Data controller - A controller determines the purposes and means of processing personal data.

Data processor - A processor is responsible for processing personal data on behalf of a controller.

Data subject – Natural person

Categories of data: Personal data and special categories of personal data

Personal data - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

Special categories personal data - The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

2. Who are we?

Made To Order Limited is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are: 0161 9298601. For all data matters contact our Data Representative Rebecca Owen on owen_r@subwaynorthwest.com.

3. The purpose(s) of processing your personal data

We use your personal data for the following purposes:

To place orders with our suppliers

To pay our suppliers

To Maintain our accounts and records

To invite our suppliers to periodic social and/or charity events

- To take payment from our customers
- To deliver catering orders to our customers
- To reply to customer comments
- To report accidents and incidents to the relevant authorities

4. The categories of personal data concerned

With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

Suppliers

- Contact name and contact details
- Bank account

Customers

- Name and contact details
 - Delivery address for catering orders
 - Payment details for catering orders
 - Redacted card details
- We have obtained your personal data from:

Suppliers

- Company website (publicly accessible source)
- Recommendation
- Your representative
- Invoices, credit notes and statements

Customers

- Customers completing catering order forms
- Customer paying with their credit/debit card
- Customers providing details to us

5. What is our legal basis for processing your personal data?

a) Personal data (article 6 of GDPR)

Our lawful basis for processing your general personal data:

<input type="checkbox"/> Processing necessary for the performance of a contract with the data subject or to take steps to enter into a contract	<ul style="list-style-type: none"> • To place orders with our suppliers • To pay our suppliers • To Maintain our accounts and records • To invite our suppliers to periodic social and/or charity events • To take payment from our customers • To deliver catering orders to our customers • To reply to customer comments
<input type="checkbox"/> Processing necessary for compliance with a legal obligation	<ul style="list-style-type: none"> • To report accidents and incidents to the relevant authorities

6. Sharing your personal data

Your personal data will be treated as strictly confidential, and will be shared only with internal employees of the company where necessary. There may be occasion where we share your data with legal authorities (the Police/EHO and/or our insurance companies).

7. How long do we keep your personal data?

Type of data	Reason for Retention	Length of retention
Suppliers – contact details and payment details (on invoices)	Purchase ledger Business contact	6 years plus current year
Store Customers – redacted number on merchant copy of credit card	Defend chargebacks	18 months
Catering Customers contact details	Delivery of product	6 years from last order
Catering Customers – payment details (credit cards)	Take agreed payment	6 years from last order
Catering customers – payment details (paid on account)	Sales Ledger	6 years
Customers' name and contact details (from customer comments)	To respond to comments where necessary	6 years for customer complaints
Name and address of injured party (accident form)	For insurance purposes	3 years after last communication

We keep your personal data for no longer than reasonably necessary.

8. Providing us with your personal data

We require your personal data as it is a contractual requirement

9. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;

- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

10. Transfer of Data Abroad

We do not transfer personal data outside of the EEA.

11. Automated Decision Making

We do not use any form of automated decision making in our business

12. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

13. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

14. How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact our Data Representative, Rebecca Owen on owen_r@subwaynorthwest.com.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the Information Commissioners Office on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.

GDPR: DATA PRIVACY NOTICE FOR JOB APPLICANTS

1. Why have you been given this privacy notice?

Made To Order Limited is a "data controller". This means we are required under data protection legislation to notify you of how we will, collect process and store your personal data during the application and recruitment process. We will also explain what rights you have in relation to how we process your personal data.

2. What are our obligations to you in relation to how we process your personal data?

We are required by law to ensure that when processing any of your personal data that it is:

- 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 in a form which permits you to be identified for only as long as necessary for the purposes we have told you about.
- Kept securely.

3. What personal data will we collect, use and store about you?

In order to process your job application we will collect the following information about you:

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- details of your availability;
- information about your current level of remuneration, including benefit entitlements;
- information about your entitlement to work in the UK;
- assessment interview, psychometric test, technical assessment
- pre-employment screening, disclosure and barring service

4. How do we collect your personal data?

We will collect this information from a range of sources, which will include your application form, CV, your passport or other identity documents, or information provided directly by you through interviews or other forms of assessment.

The organisation will also collect personal data about you from third parties, such as references supplied by former employers.

5. How will we use your personal data?

Throughout the recruitment process we will need to process your personal data for one or more of the following lawful bases:

- a) Where we need to process your personal data to take specific steps at your request before entering into a contract with you or we need to process data to enter into a contract with you. This may include making reasonable adjustments to the recruitment process to accommodate

- disabilities as and when requested.
- b) Where we need to process your personal data to comply with a legal obligation, for example if your application is successful we will check your right to work in the UK before a job offer is made.
 - c) Our legitimate reason for processing your personal data is to enable us to gather data so that we can assess which candidate's skills and experience is the best match with our job role requirements and therefore suitable for employment. We also need to process job application information in order to respond to and defend against legal complaints. We will process your personal data for these legitimate reasons provided that your interests and fundamental rights do not override those interests.
 - d) Where we need to protect your interests (or someone else's interests).
 - e) Where it is needed in the public interest [or for official purposes].

6. When will we use your personal data?

During the application and recruitment process and for a short period after the recruitment process, we will use your personal information for specific purposes. The list below describes the purpose of our processing, the personal data involved (from clause 3 above) and the lawful basis for our processing (from clause 5 above):

Purpose	Personal data involved	Lawful basis for processing
Right to work in the UK check	ID documentation (see www.gov.uk/government/publications/acceptable-right-to-work-documents-an-employers-guide for a list of acceptable document	Legal Obligation
Contact details to contact you to organise interview/conduct screening/offer you a job	Name, telephone number, address, email address	Legitimate interest
Assess a candidates suitability against the vacancy person specification	Qualifications, skills, experience and employment history, references, availability, information about your current level of remuneration, including benefit entitlements, assessment interview, psychometric test, technical assessment, pre-employment screening, criminal convictions	Legitimate interest

The organisation will not use your data for any purpose other than recruitment purposes. You are not obliged to provide consent but if consent is provided you are free to withdraw your consent at any time.

7. What happens if you do not provide us with information?

We will only ask you to provide information which we believe is necessary for the application and recruitment process. You are under no statutory or contractual obligation to provide data during the recruitment process. However, if you do not provide sufficient information, we may not be able to process your application properly or at all. Also we may not be able to meet our legal obligations towards you with regard to reasonable adjustments.

8. What happens if we need to use your personal data for a new purpose?

We have indicated above a list of circumstances in which we will use your data. We will usually only use your personal data as indicated. However, if we consider that it is necessary and reasonable to use your personal data for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so.

9. How do we use your special categories information?

Any personal data which reveals your ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, genetic, biometric or health data, sex life and sexual orientations will be regarded as special categories of personal data. We will only use this data in the following ways:

- In order to comply with employment and other laws to ensure that the recruitment process is conducted in a fair and inclusive manner.
- To ensure we meet our health and safety and equality obligations towards you we will use information about your physical or mental health or disability status to make appropriate reasonable adjustments to the recruitment process.
- Where it is needed in the public interest, for example for equal opportunity monitoring and reporting.

There may be circumstances where we need to process this type of information for legal claims or to protect your interests (or someone else's) and you are not able capable of giving your consent or where the relevant information has already been made public. An example of what the list may look like is as follows:

Purpose	Category of personal data	Lawful basis	Additional condition for processing
Equal opportunity monitoring	Race information	Legitimate interest	Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment
Considering Reasonable adjustments	Health data	Lawful requirement	Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment

10. Do we need your consent to use special categories data?

If we are using your personal sensitive data in accordance with the lawful purposes set out in this

privacy notice, in these circumstances we do not need your written consent to use sensitive personal data.

However, in limited circumstances, we may request your written consent to allow us to process your sensitive personal data. If it becomes necessary to request your consent to process your sensitive personal data, we will provide you with details of the information that we require and why we need it, so that you can decide whether you wish to provide your consent. It is not a condition of applying for the role with us that you must agree to any request for consent. Giving consent will always be a decision made by your freewill/choice.

11. Criminal convictions

Given the nature of the role and duties you will perform we, will request and hold information about criminal convictions. In addition, where applicable we will only request this information if you are successful in your application and where we are legally entitled to do so.

12. Automated decision making

During the application and recruitment process we will not rely on any automated decision making.

13. Will we share your personal data with third parties?

We will not share your data with third parties, unless your application for employment is successful and you accept our offer of employment.

14. Which third party service providers will we share your personal data with?

Former employers to obtain references for you

15. Third party service providers and data security

Third party service providers are only permitted to process your personal data in accordance with our specified instructions. They are also required to take appropriate measures to protect your privacy and personal information. We do not allow your information to be used by the third parties for its own purposes and business activities.

16. Will we share your personal data with other entities within our business group?

Your information will be shared internally for the purposes of the recruitment exercise. This includes:

- Members of the HR team
- Interviewers involved in the recruitment process
- Managers in the business area with a vacancy
- IT staff

17. Will we transfer your personal data outside of the European Economic Area?

The organisation will not transfer your data outside the European Economic Area.

18. How do we ensure your personal data is secure?

We take your privacy and protection of data very seriously. Consequently, we have put in place appropriate security measures to prevent unauthorised use of your personal data. Details of the measures which are in place can be obtained from Rebecca Owen (owen_r@subwaynorthwest.com). We will notify you and any applicable regulator of any suspected unauthorised use of your personal data.

19. How long will we keep your personal data?

We will retain your personal data for as long as is necessary to fulfil the purposes for which it was collected for.

If your application for employment is unsuccessful, we will hold your data on file for 6 months after the end of the relevant recruitment process.

If you agree we will keep your personal data on file, for a further 6 months for consideration for future employment opportunities.

At the end of that period or once you withdraw your consent your data will be deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held will be available in our data retention policy.

20. How will we store your data?

Your data will be stored in a number of different places, including on your application record, in HR management systems and on other IT systems (including email).

21. Your duty to inform us of any changes

In order that we can ensure that the personal data we hold in relation to you is accurate, it is important that you keep us informed of any changes to that data.

22. What rights do you have in respect of how we use your personal data?

Subject to legal limitations you have the right to:

- **Request access to your data:** You can ask us to provide a copy of the personal data we hold about you.
- **Request corrections to be made to your data:** If you think that your personal data is incomplete, inaccurate you can ask us to correct it.
- **Request erasure of your data:** If you consider there is no lawful basis for us to continue processing your data you can ask for that data to be deleted or removed.
- **Object to the processing of your data:** If our lawful basis for processing your data relates to a legitimate business interest (or third party interest) you can raise an objection to that interest. You can also object to us using your information for direct marketing purposes.
- **Request that processing restrictions be put in place:** If you believe that your information is being processed without a lawful reason or that the information is incorrect you can request that a freeze/restricting is placed on the processing of the information until your concerns are addressed.
- **Request a transfer of your personal data:** You can ask us to transfer your personal data to a third party.

If you wish to exercise any of the above rights please contact owen_r@subwaynorthwest.com.

23. Will I have to pay a fee?

You will not be expected to pay a fee to obtain your personal data unless we consider that your request for access to data is unfounded or excessive. In these circumstances we may charge you a reasonable fee or refuse to comply with your request. We may also charge a reasonable fee where we have supplied a copy of your personal data and you then request another copy of the same information.

24. Before we comply with your request

Whenever you make a request for access to personal data, to ensure that we are releasing personal data to the correct person we may ask questions to confirm your identity.

25. Right to withdraw your consent

If we have asked for your written consent to obtain information, you have the right to withdraw your consent at any time. To withdraw your consent please contact Rebecca Owen (owen_r@subwaynorthwest.com). Once we receive your notice of withdrawal we will cease processing your data unless we have any other lawful basis on which to continue processing that data.

26. Who is responsible for ensuring that rights and obligations under this privacy notice are met?

We have appointed a Data Protection Officer to ensure that your personal information is handled in accordance with this privacy notice, the data protection laws and any changes that might be made to those laws. If you have any concerns or complaint relating to how we process your personal data you are entitled to contact the Information Commissioner's Office. This office oversees all UK data protection issues.

27. Important information about this privacy notice

This notice does not form part of any contract of employment or any other contract to provide services. We reserve the right to amend or update this privacy notice at any time. We will provide you with a new notice when we make any updates.

28. How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact our Data Protection Officer on owen_r@subwaynorthwest.com. If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the Information Commissioners Office on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.

GDPR: MADE TO ORDER LIMITED - DATA PRIVACY NOTICE FOR EMPLOYEES

1. Why have you been given this privacy notice?

Made To Order Limited is a “data controller”. This means that we are required under data protection legislation to notify you of how we will process your personal data both during the employment relationship and post termination. This notice will explain how we collect your personal data, its use, storage, transfer and security. We will also explain what rights you have in relation to how we process your personal data. It is important that you read this notice, together with any other privacy notice we may provide during your employment, so that you are aware of how and why we are processing your personal data. This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time.

2. What are our obligations to you in relation to how we process your personal data?

We are required by law to ensure that when processing any of your personal data that it is:

- 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 in a form which permits you to be identified for only as long as necessary for the purposes we have told you about.
- Kept securely.

3. What personal data will we collect, use and store about you?

- Your name, salutation, addresses, contact numbers, and personal email addresses.
- Date of birth.
- Gender.
- 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.
- Copy of nominated drivers driving licence
- 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 and other information obtained through electronic means such as swipe card records.
- Information about your use of our information and communications systems.
- Photographs.
- Business contact details
- Finger/thumb prints

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

- 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.
- Biometric data.
- Information about criminal convictions and offences.

4. How do we collect your personal data?

We collect your personal data by a variety of means. At recruitment stage we have already collected data through the application process directly from you or an employment agency. We may sometimes collect additional information from third parties including former employers and credit reference agencies.

Whilst you are working with us periodically we may need to collect additional personal information from you not identified on the above list but before doing so we will provide you with a written notice setting out details of the purpose and the lawful basis of why we are collecting that data, its use, storage and your rights.

5. How will we use your personal data?

For the most part we will use your personal data for one of the following lawful bases:

- a) Where we need to perform the contract we have entered into with you.
- b) Where we need to comply with a legal obligation.
- c) Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. For example using your photo in internal newsletters or using cctv in store, passing your business contacts to relevant stores/business.

There are other rare occasions where we may use your personal data, which are:

- d) Where we need to protect your interests (or someone else’s interests).

e) Where it is needed in the public interest (or for official purposes).

6. When will we use your personal data?

During your employment and for a short period after the relationship has ended, we will use your personal information for specific purposes. The list below describes the purpose of our processing, the personal data involved (from clause 3 above) and the lawful basis for our processing (from clause 5 above):

Purpose	Category	Lawful Basis
Determining the terms on which you work for us.	Name, Start Date, remuneration	Contract
Checking your right to work in the UK.	Right to work documentation	Legal Obligation
When making payments to you to also including any necessary tax and NI deductions.	Bank Details, NI Number, Tax status	Legal Obligation
Providing the following benefits to you; Pension, Death In Service, Private Medical. Liaising with your pension provider and making payments.	Date of Birth, Gender, Contact details, salary, start date	Legal Obligation and Contract
Administration related to the performance contract of employment. Business management and work force planning, including accounting and auditing. Conducting and managing reviews of performance and determining performance requirements.	Performance details	Contract
Making decisions regarding remuneration, bonus, commission and compensation. Making decisions regarding promotions to include assessing qualifications for a particular role	Salary, annual leave, pension and bonus information, qualifications	Contract
Gathering evidence for a possible disciplinary or gathering evidence in respect of an informal complaint or grievance. Making decisions about your continued employment or engagement. Making arrangements for the termination of our working relationship.	Performance details/conduct concerns	Contract
Education, training and development requirements.	Performance	Contract

	details, contact details	
Dealing with legal disputes involving you or other employees, workers and contractors, including accidents at work.	Contact details, date of birth, performance details	Legal Obligation
Managing sickness absence, ascertaining your fitness to work.	Health	Contract and Legal Obligation
Complying with health and safety obligations, completion of accident book and RIDDOR reporting	Contact details, date of birth	Legal Obligation
Prevention of fraud through CCTV monitoring	Image	Legitimate Interest
Monitoring use of our information and communication systems to ensure compliance with our internal procedures and prevention of security lapses and breach of data protection laws. Preventing malicious software distribution	Data use	Legal Obligation
Gathering data analytics to assess retention and attrition rates	Start Date	Legitimate interest
Providing emergency contacts for store security	Contact details	Contract
Evidencing company vehicle driver's eligibility to drive	Driving Licence	Legal Obligation
Providing your business contact address (business email/telephone number/address) to customers, stores, Franchisees and suppliers	Business Contact details	Contract
Clocking on and off shift	Finger print/thumb	Contract

It's possible that some of the grounds for processing will overlap.

7. Your failure to provide information

We will only ask you to provide information which we believe is necessary for the performance of the contractual employment relationship (for example bank account details to pay you) or our associated legal obligations (for example giving salary information to HMRC). If you fail to provide certain information when requested we may not be able to meet our contractual obligations to you or we may not be able to fulfil our legal obligations.

8. What happens if we need to use your personal data for a new purpose?

We will only use your personal data for the stated purposes, unless we consider that there is a need to use it for another reason and that reason is compatible with the original purpose. However, if we consider that it is necessary and reasonable to use your personal data for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so.

There may be circumstances where we have to process your personal data without your knowledge or consent, where this is required by law and in compliance with the above rules.

9. How do we use your sensitive personal information data?

Any personal data which reveals your, ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, genetic, biometric or health data, sex life and sexual orientations will be regarded as special categories of personal data. We will only use this data in the following ways:

- In order to comply with employment and other laws when processing and managing situations connected with absences arising in relation to your sickness or family/ dependant related leave.
- To ensure we meet our health and safety obligations towards you and other employment related obligations we will use information about your physical or mental health or disability status to assess your capability to perform your role, monitor and manage your sickness absence, provide appropriate workplace adjustments and administer health related benefits.
- Where it is needed in the public interest, for example for 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.

There may be circumstances where we need to process this type of information for legal claims or to protect your interests (or someone else's) and you are not able capable of giving your consent or where the relevant information has already been made public.

Purpose	Category of personal data	Lawful basis	Additional condition for processing
Managing absence, exploring reasonable adjustments for employees with disabilities.	Health	Legal obligation	For the assessment of the working capacity of the employee and medical diagnosis
Finger prints	biometric	Legitimate business	Exercising specific

		interest	rights and obligations of the controller (or of the data subject) in the field of employment
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10. Do we need your consent to use sensitive personal data?

If we are using your personal sensitive data in accordance with our written policy to perform our legal obligations or exercise specific rights connected to your employment, in these circumstances we do not need your written consent to use sensitive personal data.

However, in limited circumstances, we may request your written consent to allow us to process your sensitive personal data. For example, your written consent will be required before we instruct a medical practitioner to prepare a medical report. If, it becomes necessary to request your consent to process your sensitive personal data, we will provide you with details of the information that we require and why we need it, so that you can decide whether you wish to provide your consent. It is not a condition of your contract of employment with us that you must agree to any request for consent. Giving consent will always be a decision made by your freewill/choice.

11. Criminal convictions

We envisage that we will hold information about criminal convictions.

We will only collect information about criminal convictions if it is appropriate given the nature of the role and duties you will perform and where we are legally entitled to do so (Processed under Article 10, Part 3 of GDPR). We will use information about criminal convictions and offences in the recruitment process.

We have in place policy and safeguards which we are required by law to maintain when processing this data.

12. Automated decision making

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

13. Will we share your personal data with third parties?

In order to meet our legal obligations connected with your employment relationship it is necessary to share your personal information with certain third parties (see below). We also need to share your data when we have legitimate business reasons for doing so and also where it is necessary in order to perform your contract.

14. Which third party service providers will we share your personal data with?

The following third-party service providers process personal information about you for the following purposes:

Third Party Name	Purpose for Sharing Information
Sage (UK) Limited	Payroll
Nest Corporation/Scottish Widows plc	Pension Provider

Unum Limited	Executive Income Replacement Plan
ADT Fire & Security Plc/Guardian Electronic Security Plc	Store security alarm companies
Datel Computing Limited/Hands-on Computer Solutions Limited/Wayne Bloore/Cloud9 Software Limited/Birchwood Computers Ltd	IT Services
Arthur J. Gallagher Insurance Brokers Ltd	Insurance Company
Riskworks Business Services Ltd	Insurance Company
Omnilife Insurance Company Limited	Death in Service
Cigna Healthcare	Private Medical
Nexus Solicitors Ltd	Company Solicitor
RSM Tax and Accounting Limited	Financial Auditors
HMRC	Comply with Tax and Revenue legislation
HSBC Bank Plc	Make payments to you

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

15. Third party service providers and data security

Third party service providers are only permitted to process your personal data in accordance with our specified instructions. They are also required to take appropriate measures to protect your privacy and personal information. We do not allow your information to be used by the third parties for its own purposes and business activities.

16. Will we share your personal data with other entities within our business group?

As a consequence of the need to report on business performance, accounting, internal business transformations and IT activity your personal data will be shared with other entities within the business group.

17. Will we transfer your personal data outside of the European Economic Area (EEA)?

We do not transfer personal data outside the EEA.

18. How do we ensure your personal data is secure?

We take your privacy and protection of data very seriously. Consequently, we have put in place appropriate security measures to prevent unauthorised use of your personal data. Details of the measures which are in place can be obtained from Rebecca Owen (owen_r@subwaynorthwest.com). We will notify you and any applicable regulator of any suspected unauthorised use of your personal data.

19. How long will we keep your personal data?

We will retain your personal data for as long as is necessary to fulfil the purposes for which it was collected for. Details of retention periods for specific purposes are available in our data retention policy which is available from Rebecca Owen (owen_r@subwaynorthwest.com). When your employment relationship comes to an end with our business we will either retain or securely destroy

your personal data in accordance with our data retention policy or other applicable laws and regulations.

20. Your duty to inform us of any changes

In order that we can ensure that the personal data we hold in relation to you is accurate, it is important that you keep us informed of any changes to that data.

21. What rights do you have in respect of how we use your personal data?

Subject to legal limitations you have the right to:

- **Request access to your data:** You can ask us to provide a copy of the personal data we hold about you.
- **Request corrections to be made to your data:** If you think that your personal data is incomplete, inaccurate you can ask us to correct it.
- **Request erasure of your data:** If you consider there is no lawful basis for us to continue processing your data you can ask for that data to be deleted or removed.
- **Object to the processing of your data:** If our lawful basis for processing your data relates to a legitimate business interest (or third party interest) you can raise an objection to that interest. You can also object to us using your information for direct marketing purposes.
- **Request that processing restrictions be put in place:** If you believe that your information is being processed without a lawful reason or that the information is incorrect you can request that a freeze/restricting is placed on the processing of the information until your concerns are addressed.
- **Request a transfer of your personal data:** You can ask us to transfer your personal data to a third party.

If you wish to exercise any of the above rights please contact Rebecca Owen (owen_r@subwaynorthwest.com).

22. Will I have to pay a fee?

You will not be expected to pay a fee to obtain your personal data unless we consider that your request for access to data is unfounded or excessive. In these circumstances we may charge you a reasonable fee or refuse to comply with your request.

23. Confirmation of identity

Whenever you make a request for access to personal data, we may request specific information to confirm your identity. This is usually done to ensure that we are releasing personal data to the correct person.

24. Right to withdraw your consent

If we have asked for your written consent to obtain information, you have the right to withdraw

your consent at any time. To withdraw your consent please contact Rebecca Owen (owen_r@subwaynorthwest.com). Once we receive your notice of withdrawal we will cease processing your data unless we have any other lawful basis on which to continue processing that data.

25. Important information about this privacy notice

We reserve the right to amend or update this privacy notice at any time. We will provide you with a new notice when we make any updates.

26. How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact our Data Representative, Rebecca Owen (owen_r@subwaynorthwest.com). If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the Information Commissioners Office on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.