



## Employee and Applicant

### Privacy Notice

#### Welcome to allpay's Employee and Applicant Privacy Notice

allpay Limited is committed to protecting and respecting your privacy.

We will keep any personal data which you provide to us safe and secure and use it in accordance with the UK Data Protection Act 2018, and UK General Data Protection Regulation (UK GDPR).

This privacy notice provides information on how allpay collects and processes your personal data when you work for us or apply to work for us in any capacity. It is important that you read this privacy notice together with our website privacy policy, your Contract of Employment and the Employee Handbook.

We reserve the right to modify this policy at any time by posting changes on this page. We suggest you check back regularly to see if we have made any changes.

#### 1. Important information and who we are

allpay is the data controller and is responsible for your personal data.

We have appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

##### Contact details

Data Protection Officer  
allpay Limited  
Fortis et Fides

Whitestone Business Park  
Whitestone  
Hereford  
HR1-3SE  
Email address: [dataprotection@allpay.net](mailto:dataprotection@allpay.net)

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please [contact us](#) in the first instance.

## 2. The data we collect about you

We may collect, use, store and transfer different kinds of personal data about you, which may include:

- **Identity Data** (for example: name(s), address, date of birth, marital status, gender)
- **Contact Data** (for example: telephone numbers and email addresses)
- **Financial Data** (for example: bank details, salary and benefits information)
- **Personal Circumstances Data** (for example: next of kin details and CV information)
- **Employment Records Data** (for example: compensation history, performance history, absence records, training records, maternity, paternity and parental leave)
- **Special Category Data** (for example: DBS results, credit checks where applicable, sickness or disability information, occupational health records, biometric data where used for secure access)
- **Disciplinary and Grievance Data** (where you are subject to, or party to, any form of disciplinary or grievance process)
- **CCTV and Security Data** (for example: images or footage captured on CCTV systems operated on company premises)

## 3. How is your personal data collected?

We use different methods to collect personal data, including:

- **Direct interactions** – where you provide information by completing application forms, HR documents, screening processes or other requests.
- **Indirect interactions** – where information is provided by internal third parties, such as your line manager, People and Talent Team, or through disciplinary or grievance investigations.
- **Third parties** – including background screening providers, payroll and pension providers, benefits providers, and occupational health services.
- **Publicly available sources** – such as LinkedIn or other professional platforms, where information is publicly accessible and relevant to the role.

## 4. How we use your personal data

We will only use your personal data for the purposes for which it was collected, which include:

- To assess suitability for employment, including background and right-to-work checks etc
- To fulfil our duties as your employer or prospective employer
- To administer pay, benefits, pensions, holidays, and employment records
- To manage performance, training, conduct, disciplinary and grievance matters
- To ensure the health, safety and security of employees, visitors and company property (including use of CCTV and access controls)
- To comply with legal, regulatory, safeguarding, and employment law obligations

## 5. Lawful basis for processing

We process personal data primarily under:

- **Article 6(1)(b)** UK GDPR – processing necessary for the performance of an employment contract or to take steps prior to entering into a contract
- **Article 6(1)(c)** – processing necessary to comply with a legal obligation
- **Article 6(1)(f)** – legitimate interests, such as maintaining workplace security and preventing fraud

Where **special category data** (including health, DBS, biometric or equality data) is processed, this is carried out in accordance with **Article 9(2)(b)** UK GDPR and relevant employment and safeguarding legislation, including allpay's background checking policy.

## 6. Disclosures of your personal data

We may share your personal data within allpay, including with your line manager, People Team, Finance Team, Compliance Team and IT teams.

We may also share personal data with trusted external third parties, including:

- Background screening providers
- Payroll, pension and benefits providers
- Occupational health and medical professionals
- IT, People systems and security providers
- Regulatory bodies and professional advisers where required

All third parties are required to respect the security of your personal data, to process it only in line with our instructions, and to comply with data protection law.

## 7. International transfers

We do not transfer, store or process your personal data outside of the European Economic Area.

## 8. Data retention

We retain personal data only for as long as necessary to fulfil the purposes we collected it for, including to satisfy legal, regulatory, payroll and employment requirements.

Typical retention periods include:

- Recruitment records: retained for a limited period following completion of the recruitment process
- Employment records: retained for the duration of employment and for a 6 year period thereafter
- Payroll and tax records: retained in line with statutory requirements
- DBS, screening and health data: retained in accordance with legal obligations and relevant codes of practice

Further details on data retention are available from The People Team or the Compliance Team.

## 9. CCTV, biometrics and workplace monitoring

CCTV operates on our premises for security, safety, and crime prevention purposes.

CCTV is not used for routine performance monitoring and access to footage is strictly controlled. It can, however, be used in the event of a potential breach of legislation, for example Health and Safety.

Where biometric data is used (for example, for secure access control), this processing is limited, proportionate, and subject to appropriate safeguards.

## 10. Automated decision making

We do not make employment decisions based solely on automated processing. Any automated screening or system-generated results are reviewed by an authorised member of the team before decisions are made.

## 11. Your legal rights

Under data protection laws, you have rights in relation to your personal data, including:

- The right to request access to your personal data
- The right to request correction of inaccurate or incomplete data
- The right to request erasure of personal data (where applicable)
- The right to object to processing in certain circumstances
- The right to request restriction of processing
- The right to request data portability

Some rights may be limited where processing is necessary to meet legal or employment obligations.

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues: [www.ico.org.uk](http://www.ico.org.uk).

If you wish to exercise any of these rights, please contact the People Team or the DPO.

## 12. Consequences of failing to provide personal data

If you do not provide personal data that is necessary for employment checks, payroll, safety, or legal compliance, we may be unable to progress your application, fulfil our contractual obligations, or continue your employment.

## 13. Further information

If you would like further information about how we process your personal data, including data security measures, lawful processing bases or retention periods, please contact the People Team or the Compliance Team.

*Victoria Preece*

**Victoria Preece**  
Director of Governance

APRIL  
2026