

Keystone Hospitality Limited

PRIVACY NOTICE

1. Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

2. Responsibilities

- 2.1. The Data Protection Officer / GDPR Representative is responsible for ensuring that this notice is made available to data subjects prior to Keystone Hospitality Limited collecting/processing their personal data.
- 2.2. All Employees/Staff of Keystone Hospitality Limited who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

3. Privacy Notice

3.1. About Us

Keystone Hospitality Limited is a private limited company, registered in the United Kingdom under 09569494.

Our Data Protection Officer / GDPR Representative and data protection representatives can be contacted directly here: dpo@keystone-group.net

Tel. 0844 225 1010

- www.keystone-hospitality.com

3.1.2 The types of personal data we collect and use

The personal data we collect from/process on candidates/workers is summarized below:

Type of information held	How this information is used
Name	To enable managers and administrators of the service to identify you and ensure work and payment details are accurate and properly relate to you
Address	To ensure compliance with legislation, regulations and organisational policy around the employment of workers and to enable managers and administrators
Age	To establish compliance with employment law and rates of pay and ensure appropriate handling of work assignments and duties
Date of Birth	To establish compliance with employment law and rates of pay and ensure appropriate handling of work assignments and duties
Availability to work	To enable managers and administrators to establish your availability to undertake work assignments

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Eligibility to work in the UK	To establish your legal right to work in the UK and compliance with the requirements of legislation and the work to be undertaken
Your employment status	To establish your current status as an employee, contractor or worker in order to ensure compliance with legislation and suitability to the work proposed to be undertaken
Passport, visa and other proof of identity documentation	To provide evidence of compliance with right to work, right to remain and status of working within the UK and in accordance with the organisation offering the work assignment and to support evidence of identity. Electronic versions of such documentation
Nationality	To support right to work and eligibility evidence and to capture diversity and equality measures and policies of the hiring organisation
Ethnic origin	To capture diversity and equality measures and policies of the hiring organisation
Gender	To capture diversity and equality measures and policies of the hiring organisation
Sexual orientation	To capture diversity and equality measures and policies of the hiring organisation
Registered disability status	To capture diversity and equality measures and policies of the hiring organisation and ensure managers and administrators can make reasonable adjustments and offer appropriate roles
Previous and current employment information	To provide managers and administrators with relevant information relating to prior work experiences, pay rates and other relevant information and to provide you with a record of work experience
Contact telephone number(s)	To enable managers and administrators to contact you in relation to work related matters and to provide information relating to your account and service
Contact email address	To enable managers and administrators to contact you in relation to work related matters and to provide information relating to your account and service
Student Reference Number	To enable organisations, including hiring managers and administrators to verify your student status and study information and to support proof of identity and eligibility for certain functions and services
Staff ID or Employer Number	To enable organisations, including hiring managers and administrators to verify your staff or employee status and to support proof of identity and eligibility for certain functions and services
National Insurance Number	To enable the payment for work and facilitate National Insurance contributions and deductions and to ensure compliance with current legislation and accounting requirements and to support proof of identity and eligibility
Tax Code and Taxation information	To ensure correct application of tax codes and to ensure compliance with legislation and accounting regulations
Employment start date	To ensure an accurate record is kept of all work you undertake and ensure compliance with necessary record keeping requirements
Work assignment start and end dates	To ensure an accurate record is kept of all work assignments undertaken over the system and provide an audit trail of those work assignments and to ensure compliance with all necessary record keeping requirements
Number of hours worked and on which days and at which times	To ensure an accurate record is kept of all work assignments undertaken and to ensure compliance with working hours rules and regulations and

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	organisational policy and to comply with all relevant record keeping requirements
Notes and messages between you and your manager/supervisor and service administrators	To provide you and your hiring manager and relevant administration staff with a record of certain correspondence relating to work assignments and work related activity to provide up to date messaging and notifications and provide a record of all such messaging and notes
Student loan information	To ascertain the status of any student loan(s) in order to provide institutions and administrators with accurate information and to ensure compliance in relation to taxation and earnings information and to ensure compliance with relevant legislation and regulations
Details of when your studies start and finish and what type of studies you are undertaking and the duration of those studies	To provide the institution and service administrators with accurate information relating to your studies and the corresponding rules around how you may work, in what roles and for how many hours and to ensure compliance with relevant regulation and legislation
Next of kin	To enable the institution to contact named next of kin in the event of exceptional instances such as emergencies, incapacitation etc
Emergency contact information	To enable the institution to contact named emergency contacts in the event of exceptional instances such as emergencies, incapacitation etc
Your skills and qualifications	To facilitate the offering of relevant work opportunities and to provide managers and administrators with information on your skills and qualifications for reporting and analysis
Your areas of interest in work and working preferences	To facilitate the offering of relevant work opportunities and to provide managers and administrators with information on your skills and qualifications for reporting and analysis
References from prior and current managers and employers	To provide managers and administrators with meaningful references relating to prior work in order to assess suitability to work offers and enabling managers and administrators to follow up and contact the named referees where appropriate
Rates of pay, holiday pay, national insurance contributions, pension payments, bonus and ancillary payments and any deductions from pay	To provide an accurate record of pay, holiday pay, national insurance contributions, pension payments, bonus and ancillary payments and any deductions from pay to yourself, relevant managers and administrators and relevant tax authorities and to provide a record that complies with all relevant taxation and pay requirements and regulations
Personal statements in support of being considered for a work or voluntary assignment	To enable you to provide potential hiring managers and administration staff with a personal statement that supports your interests, abilities or other points of note that may help with decision making and to provide information for reporting and analysis
Education history, locations and grades	To provide your online profile with an up to date list of relevant qualifications and education history, including locations, dates, grades and other relevant information to provide managers and administration staff with information that can assist the offering of appropriate work and to enable reporting and analysis
Curriculum Vitae	To enable you to store a Curriculum Vitae as a part of your profile to make it available to managers and administrators as part of finding and offering you work that matches your skills, interests and capability and to provide insight on previous roles
Supporting documents that you upload in support of being	To enable you to store any other documents, of your choice that may support your application or consideration for a role and to provide managers and

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considered for a work or voluntary assignment	administrators with information that will assist and inform the selection process
Details of previous work assignments including duration, timesheet information and rates of pay	To enable you, managers and administrators to access information relation to previous work experience, duration, pay rates and other information relevant to prior work roles to establish suitability to a role and to collate information for reporting purposes on activity, trends and spend
Photographic images of you	To enable managers and staff to associate your profile with you as an individual for identification and interaction purposes
Changes made to your profile, account and settings	To ensure a full audit trail of access to and changes to your online profile and account are maintained for safety, compliance and reporting purposes and to provide accountability for all such changes

3.1.2.1 Personal Data from third party sources

Keystone Hospitality Limited sources some personal data from third party sources, namely:

- The Caterer.Com website
- Selected job boards and CV websites that you may have registered with
- Referees and previous employers

In all instances Keystone Hospitality Limited will continue to process your personal data on the legal basis as described here and your rights to ask us to stop processing or to access/delete your data remain unchanged. Where you have registered with third party services (for example with Caterer.com) you will also be subject to that organisation's Privacy Policy, which you should obtain from that source directly.

3.1.3 Using your personal data: the legal basis and purposes

Keystone Hospitality will process your data in accordance with GDPR and Data Protection law for the purposes as stated in 3.1.2 and on the following legal basis:

As necessary **to perform our contract with you and with your employers:**

- To allow you to find work opportunities
- To enable employers to offer you work opportunities
- To properly record all relevant work activities
- To ensure you are paid correctly and in accordance with agreed work assignments and terms and conditions relating to any role

As necessary for our **own legitimate interests:**

- For good governance, business management, accounting, recording of activity and auditing our business operations
- To monitor all correspondence and activity in relation to your account and profile and those of people and institutions with an interest in hiring you
- To report on our business activities, undertake analysis, develop statistics and provide insights on our activities to legitimately interested parties

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- To send you information and marketing information-solely on services and issues relevant to you, your relationship with Keystone and/or employers or potential employers

As necessary to **comply with our legal obligations**:

- To provide relevant authorities with tax, NI, accountancy and other financial regulatory requirements
- To verify worker identity, right to work and other UKVI and regulatory requirements of workers and organisations
- For compliance with other regulatory and legal requirements and disclosures
- For detection, prevention and investigation of any criminal activity

Based on **your consent**:

- When you ask us to make your profile or any personal information available to third parties (for example employers or referees)
- To send you information where you have consented for us to do so

In all cases of consent based processing, that consent can be withdrawn via the Data Subject Access Request process at any time.

The only special categories of personal data captured or processed relate to racial and ethnic origin which some employers use to measure their equal opportunities performance, however all data subjects can opt whether or not to answer those questions when registering and creating their profile. Even where this information is given, the data subject retains the right to remove, delete or alter that information, in accordance with the Data Subject Access request process.

3.2. Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for Keystone Hospitality Limited to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

Keystone Hospitality maintains a Data Subject Access Request process (including you withdrawing consent and accessing any information, asking for personal data to be deleted, accessed or for processing to cease) which you can access at any time by contacting us as follows:

- Email: dpo@keystone-group.net
- Tel: 0844 225 1010

You may withdraw consent, cease processing, request to port personal data at any time by making a Data Subject Access Request. NB: you will be asked to provide proof of identity.

3.3. Disclosure

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Keystone Hospitality Limited will not pass on your personal data to third parties without first obtaining your consent, other than those instances listed below. The following third parties will receive your personal data for the following purpose(s) as part of the processing activities:

- Previous employers – to enable them to meet their contractual and legal obligations
- Current employers – to enable them to meet their contractual and legal obligations
- Prospective employers – to enable them to offer your work opportunities
- Contracted payrolls software providers – to enable certain services that facilitate your payment for work

3.4. Retention Period

Keystone Hospitality Limited will store and process personal data for up to 7 years in the interests of helping you find work (if you are a candidate) and/or helping you to find suitable employers (if you are an employing business or organization. You may request for your data to be amended or deleted at any time as per section 3.5

Keystone Hospitality Limited will maintain certain information as required to meet our legal obligations with taxation, financial record keeping and right to work laws.

If you choose to create an account using Keystone Talent Bank, your details will be stored and processed for as long as your account is kept active, and thereafter certain information will be stored up to 7 years as required to meet our legal obligations with taxation, financial record keeping and right to work laws.

3.5. Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.

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- Right to judicial review: in the event that Keystone Hospitality Limited refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved in the processing of your personal data.

3.6. Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Keystone Hospitality Limited you can contact Keystone's nominated Data Protection Officer at: dpo@keystone-group.net

You also have the right to complain to the Information Commissioner's Office. It has enforcement powers and can investigate compliance with data protection law: ico.org.uk

4. Further information

Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

“any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

How we use your information

This privacy notice tells you how we, Keystone Hospitality Limited will collect and use your personal data and is detailed in section 3.1.2

We make an important distinction between capturing and analysing general web traffic and your personal data we store and process as a registered user. The first category collects data about users' browsing actions and patterns, helping us to improve: our website, its content, features and general infrastructure performance. This type of data is collected by cookies and analysed with analytics software - no personal data is captured, this is aggregated data and does not identify any individual. The second category - registered users - does involve storing and processing of personal data for the purpose of related activities and services as detailed in 3.1.2

How we use Cookies

We use **Session Cookies** to provide security and carry information across pages of the Website and avoid you having to re-enter information; they are temporary and remain in the cookie file of your browser until you leave the Website.

We use **Persistent Cookies** to help when you return to the Website so we can tailor content and the presentation of the Website to match your preferences; they also assist in compiling anonymous,

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aggregated statistics that allow us to understand how users use the Website and so help us improve the structure of the Website. Persistent Cookies remain in the cookie file of your browser for much longer (though how long will depend on the lifetime of each specific cookie).

You have the ability to accept or decline cookies by modifying the settings in your browser. However, you may not be able to use all the interactive features of the Website if cookies are disabled.

Collecting personal data

All personal data you enter are captured via securely encrypted pages. Browsers display these security credentials using a padlock symbol; the exact format varies from browser to browser.

If you do not see a padlock symbol or the certificate details do not verify Keystone Hospitality Limited as the owner of the site – then do not enter any details and contact our Customer Services team on 0844 225 1010 or our nominated DPO at dpo@keystonetalentbank.com

Sensitive details like passwords and bank details are stored in an encrypted form and all Personal Data is stored within the EEA at a secure data centre which is certified to ISO27001 - the only auditable international standard for information security management systems. Daily, encrypted backups of all data are performed and stored off-site.

Why does Keystone Hospitality Limited need to collect and store personal data?

In order for us to provide you with a service we need to collect personal data for to enable prospective employers and other legitimate parties to offer you opportunities and information relating to work assignments. Please refer to Section 3.1.2 for a complete summary of the information we capture and what we do with it. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

In terms of being contacted for marketing purposes Keystone Hospitality Limited would contact you for additional consent.

Will Keystone Hospitality Limited share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to Keystone or your direct employer/and/or organization/institution in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with Keystone's procedures and data protection policy. If we wish to pass your personal data onto another third party, not directly involved in the provision of services to your or our clients, we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

How will Keystone use the personal data it collects about me?

Keystone will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information

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accurate and up to date, and not keep it for longer than is necessary. Keystone is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

Under what circumstances will Keystone contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

Can I find out the personal data that the organisation holds about me?

Keystone at your request, can confirm what information we hold about you and how it is processed. If Keystone does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Keystone or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

Acceptable Use Policy

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In using the web service clients agree to use it for the sole purpose of finding suitable Workers, offering them work related opportunities on behalf of their organisation and engaging with them through the system. Furthermore, users agree not to:

- Post, publish, distribute or disseminate material or information that is defamatory, infringing, obscene, indecent, threatening, abusive, harassing or unlawful;
- Post, publish, distribute or disseminate material or information that you do not have a right to transmit under any law or under contractual or fiduciary relationships (such as inside information or confidential information disclosed in the course of employment or under a confidentiality agreement);
- Impersonate any person or entity for the purpose of misleading others;
- Threaten, abuse, disrupt, stalk or otherwise violate the legal rights (including rights of privacy and publicity) of others;
- Post, publish, distribute or disseminate material or information that incites discrimination, hate or violence towards any person or group on account of their race, religion, disability, nationality or otherwise;
- Create any separate database in electronic or structured manual form by systematically downloading and storing all and any of the content.
- Use any information or material in any manner that infringes any copyright, trademark, patent or other proprietary right of any party;
- Use DirectTemping.com or Talent Bank in any manner that could damage, disable, overburden or impair the service or interfere with any other party's use and enjoyment of the services
- Attempt to gain unauthorised access to any of the Services, other accounts, computer systems or networks connected to the Website/Services through hacking, password mining or any other means.

Users acknowledge that Keystone Hospitality Limited own the copyright and all other intellectual property rights associated with the content, save where otherwise stated.

For further information or to request a Data Subject Access Request please contact:

dpo@keystone-group.net

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