

## Privacy Notice

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## Version Control

Version	Change Description	Author	Date
0.1	Initial Draft	Leon Lonsdale	07/08/2018
0.2	Reworded data processing section	Leon Lonsdale	14/08/2018
0.3	Added data retention information	Leon Lonsdale	07/09/2018
1.0	Approved Version	Leon Lonsdale	19/09/2018
1.1	Updated 'Who processes your data'	Leon Lonsdale	19/11/2018
2.0	Approved Version	Leon Lonsdale	23/11/2018
2.1	Added 'Who does this apply to', 'Data Destruction' sections and tabulated the data retention section.	Leon Lonsdale	27/11/2018
2.2	Completely revamped for clarity and ease of reading	Leon Lonsdale	27/02/2019
2.3	Added more content about visitor data	Leon Lonsdale	14/03/2019
3.0	Approved Version	Leon Lonsdale	14/03/2019
3.1	Updated disclosure section to reflect new credit referencing supplier	Leon Lonsdale	18/03/2019
4.0	Approved	Leon Lonsdale	28/03/2019

## Approvals

Version	Approver	Title	Date
1.0	Amir Mirza	Data Protection Officer	19/09/2018
2.0	Amir Mirza	Data Protection Officer	23/11/2018
3.0	Amir Mirza	Data Protection Officer	14/03/2019
4.0	Amir Mirza	Data Protection Officer	28/03/2019

## Distribution

Version	Name	Title	Date
4.0	TCC Intranet	Knowledgebase	28/03/2019

## Introduction

Thank you for choosing The Contact Company as your place of work, and for taking the time to read our Privacy Notice.

We are a contact centre supporting high profile clients through various sectors of industry including retail, finance and technology. During your time here, there will be occasions in which we will receive your personal information (for example, your name, address and telephone number).

We recognise the trust that you place in us when you share your personal information with us, and are committed to operating with openness, honesty and transparency.

In this notice, we will provide you with details of:

- the personal information that we will collect when we engage with you
- How we will use and look after your personal information
- Your privacy rights and how the law protects you

## Purpose

In this Privacy Notice, we provide you with information on how we collect and process (use) your personal information.

We may use additional privacy notices to supplement this notice whenever we have a need to collect additional information, or process your information in ways that differ from those described here. In any event, those additional Privacy Notices will be provided to you prior to collection of additional information or when we process your information in a different way.

## Who we are

Launched in 2006, by CEO Asif Hamid MBE, the company was formed to provide exceptional service and drive cost efficiencies for businesses seeking a UK-based outsource customer service facility. As the largest privately-owned contact centre in the country, The Contact Company delivers economies of scale for all clients, whilst sharing best practice, to ensure it, and its clients, remain at the forefront of the customer service industry.

The business has grown exponentially in its first ten years: from a small start-up employing just six people, to a large, private sector employer. The quality of service and value

delivered by The Contact Company has been one of the catalysts for the growing number of organisations bringing their outsourced business to the UK from overseas.

From the start, the company has consistently invested 25% of its annual profits into staff training and development. We provide the highest quality candidates with access to comprehensive training, leading technology and purpose-built facilities to deliver an unrivalled level of service in our industry, meaning our customers benefit from the best.

## Contact Details

Our full contact details, if you wish to contact us are:

**Address:** The Contact Company, Queensgate, Grange Road East, Birkenhead  
**Post Code:** CH41 5FD  
**Phone:** 0845 303 4333  
**Email:** [enquiries@tcc.co.uk](mailto:enquiries@tcc.co.uk)

If you'd like to contact the Data Protection Officer, the full details are:

**Name:** Amir Mirza  
**Address:** The Contact Company, Queensgate, Grange Road East, Birkenhead  
**Post Code:** CH41 5FD  
**Phone:** 0845 303 4333  
**Email:** [Amir@tcc.co.uk](mailto:Amir@tcc.co.uk)

## Changes to the Privacy Notice

For information on what has been changed within this Privacy Notice, please refer to the change log found on page 2.

## Changes to your personal information

The ICO and the General Data Protection Regulation require that your information is kept up to date and is accurate at all times. You have the right to have us correct any of your information that you feel is inaccurate and non-current (Right to Rectification). Please contact us to provide any updates if your personal information changes.

## Types of Personal Information we collect about you

Personal information is any information relating to an identifiable living individual. We may collect, use, store and transfer different kinds of personal information about you whenever we engage with you, examples of information we may collect are:

- Identity information including your name and date of birth.
- Contact information including your address, email address and telephone number.
- Technical information when you visit our website, including your Internet Protocol (IP) address.
- Reference information including previous employers and character references.
- Emergency contact information including next of kin.
- Vehicle information if you require access to the company car park such as your vehicle registration number.
- Employer information if you are on a visit to the company, including your company name.

## Types of Personal Information we generate for you

During your time in the Contact Company we will create new data for you that will be considered your personal information:

- Usernames to access the company systems if required;
- Employee ID required to clock in and out at the beginning and end of your shifts and to help us identify you within the company, if required;
- Performance figures, such as Average Call Durations, if required; and
- Attendance figures, such as Bradford Score.

## Special Category Data we may collect about you

We do not generally collect any special categories of personal data about you (such as your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership). There are, however, a few occasions on which we do need to collect this information:

- Medical information – we may require doctors notes to confirm absences.
- Criminal Record Information – due to the nature of some of our clients business, we are required to perform a CRB check as part of the vetting process.

- Credit Reference information – due to the nature of some of our clients business, we are required to perform a Credit Check as part of the vetting process.
- Biometric data (such as finger prints) – our clock in and out system operates using fingerprint scanners.

## Referencing Personal Data in this Privacy Notice

Where we refer to personal information in this notice, it may include any or all of the data listed within the Personal Data collected, generated and Special Category Data sections above.

## How we collect your Personal Data

We collect your information in the following ways:

- The majority information that we collect will be collected directly from you – most of the information coming from your application form. If you are employed by an agency, they will provide us with your information on your behalf. If you are visiting, you will provide some details on the sign-in computer in reception;
- Special category data will be provided to us from third party organisations that specialise in the service required (CRB checks and credit checks) and who have been thoroughly researched to ensure quality of practice. You may also provide some of this information yourself;
- Generated personal data will be created using technology;
- Cookies are used on the company website automatically. Please see our website Privacy Policy for more information on cookies.

## Legal basis for processing your personal information

UK data protection law (the General Data Protection Regulation) requires us to have a “legal basis” for processing (using) your personal data. The legal bases we rely on are:

- Where we have your specific consent to use your personal information for a specific purpose (for example, where we contact you by email).
- Where we process your personal information for our legitimate interests (or those of a third party). Please see “Legitimate Interests” – below.
- Where the processing of personal information is necessary to perform a contract with you (for example, where you have purchased a product from us).

- Where the processing of personal information is necessary to comply with a legal or regulatory obligation that applies to us (for example, in some instances, we may be required to share your information with the Information Commissionaires Office, other regulators or law enforcement agencies) or to use your information for due diligence or ethical screening purposes.

## How we will use your information

We will not sell your personal information (nor will we purchase additional information). We do not use automated profiling for marketing purposes nor will we use it for any other marketing purposes without your consent. We will only contact you in a way that is consistent with our relationship with you (how you would usually expect to be contacted and for reasons you might expect in accordance with your relationship, and with materials you would expect to receive from us).

We will use your personal information to:

- To contact you by phone;
- So that we can ensure you have the tools required to work comfortably;
- To provide relevant training;
- To create required user accounts and system profiles;
- To analyse your performance;
- To record and analyse your attendance;
- To notify you about changes to our services;
- To invite you to interviews for roles you have applied for;
- Internal record keeping;
- To pay your wages; and
- To ensure your income tax is paid.

## Building our understanding

We may use your information to help us understand your skills, motivations and needs in order to ensure that you find yourself in the most suitable position and that we provide you with the correct tools and technologies for you to complete your role and do so comfortably.

## Legitimate Interests

When we use our legitimate interests as the legal basis for processing your personal information, we will consider and balance any potential impact on you and your rights

before we process your personal information. We will only then proceed where we believe our interests are not overridden by the impact on you. Our legitimate interests include the interests of our organisation in conducting and managing our operations to enable us to give you the best service and the best and most secure experience. Specific examples of this include:

- Analysis of performance
- Monitor attendance
- Create relevant user accounts and have our clients do the same

## Disclosure of your personal information

Your personal information may be shared with the following:

Third Party	Description
Mitrefinch	Mitrefinch is a system used to assist in monitoring attendance with a view to expediting payroll. They supply fingerprint scanners which are used at the start and end of each shift to record arrival and departure.
Disclosure Services & Credit Reference Agencies	Should your role require it, your personal information will be provided to Disclosure Services to complete DBS checks as part of our vetting process. Similarly, information will be passed to Veriphy to perform credit reference checks.
Google Analytics/Cookies	Please see the Privacy Notice on The Contact Company website ( <a href="http://www.tcc.co.uk">www.tcc.co.uk</a> ) which explains, in detail, our use of Google Analytics and Google Cookies.
HMRC/Regulators	We are under a legal duty to disclose or share your personal information in order to comply with legal obligations, including to HM Revenue & Customs, regulators and other authorities.
Clients	Your personal information will be shared with the one of our clients if you're placed in employment within the campaign that supports them. The client will use this information to create your user accounts within their systems, and in some cases, provide your managers with performance statistics.

We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions. Some of our partners run their operations outside of the EEA (European Economic Area) and this may include countries that have different data protection laws. We will always take steps to make

sure appropriate protections are in place (in accordance with UK data protection law) and that information is safeguarded.

## Children

We will collect personal information and engage with you in accordance with this privacy notice, however, please note, if you are under 16, you must have your parent or guardian's permission before you provide us with any personal information.

If you are 14 or under we will require a parent or guardian's to accompany you before we engage with you and we will ask such parent or guardian to verify in writing that we may engage with you (and will typically then collect the parent or guardians' personal information and not that of the child).

## Data Security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

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

## Data Retention – How long we will keep your data

We will only retain your personal information 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 and to enable us to continue to tell our story (which will include reference to archive material).

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

At the end of an agreed retention period your information will either be securely and confidentially destroyed or anonymised. Anonymisation is the process of either encrypting or removing personal information from data sets, so that it is not possible to identify individuals from the data.

If you would like any more specific information, ask your line manager to log an ARC Helpdesk ticket and we will endeavour to answer your questions.

## Your rights to your personal information

Under certain circumstances, you have rights under data protection laws in relation to your personal information:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information in certain circumstances e.g. where it is no longer necessary for us to retain it. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal information where we are relying on the legitimate interest basis (or those of a third party) or where we are processing your personal information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your personal information which overrides your rights and freedoms.
- **Request restriction** of processing of your personal information in certain circumstances.
- **Request the portability of your personal information** to you or to a third party. We will provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is

the case at the time you withdraw your consent. In addition, we may not always be able to fulfil a request to withdraw consent in the event that it would come at substantial business cost to do so.

## Exercising your rights

In order to exercise any of these rights you will need to make a request using the ARC Helpdesk accessible via The Contact Company Intranet (or ask your line manager to do so if you do not have access), or by emailing [GDPR@tcc.co.uk](mailto:GDPR@tcc.co.uk) if you are not an employee.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Upon making your request we will respond to you within one calendar month. If one calendar month ends on a Saturday, Sunday or Bank Holiday, then the end of the calendar month will be considered close of business of the next available working day.

## Right to Complain

You have the right to make a complaint or raise any concerns that you have, that relate to our approach to your personal information to the Information Commissioner's Office (the regulatory authority for data protection issues in the UK ([www.ico.org.uk](http://www.ico.org.uk))). We would appreciate it if you could let us know if you contact the ICO. If you feel able to contact us before making contact with the ICO, we will take your concerns seriously and we promise to work with you to resolve any issues that you have (noting that we will tell you if you should refer the issue to the ICO and that we may also need to tell the ICO).