



UK

Recruitment Privacy Notice (how we use staff and contractors' personal information)

Location	Oxford Campus, C/o Activate Learning, Jericho Building, Oxford OX1 1SA
Monitoring	The Principal and Office Manager – all members of staff
Overall responsibility	Board of Directors
Created	February 2023
Last review date	August 2025
Next review date	August 2026 or when necessary

EM Normandie UK Limited (hereafter 'EMN', 'EMN UK', 'the school') is committed to protecting your privacy. This privacy notice explains how we collect, use and share your personal information, and your rights in relation to the personal information we hold. The Notice applies to employees, workers and contractors of EMN. EMN is a controller of personal information and subject to the Data Protection Act 2018 and the UK's General Data Protection Regulation(GDPR).

Please note that, because of EMN's particular circumstances as tenants of premises inside Oxford's Further Education College run by Activate Learning, some personal data has to be communicated to Activate Learning and Activate Learning's Privacy Notice for Staff therefore also applies. This can be found at www.activatelearning.ac.uk/who-we-are/privacy-and-data-protection.

We may collect, use and share your personal information in order to meet the company's obligations as an employer or as the result of a contractual agreement between EMN and yourself. We are setting out below the type of information we may collect, how it may be used, how long we may keep it and with whom it may be shared.

1. The information we may hold

The information that we collect, hold and share may include

- personal information (such as name, date of birth, address, telephone number, bank account details, national insurance number, contact details, photographs, your nationality and your country of birth)
- documentary evidence as proof of your identity, address and your right to live and work in the UK (such as your passport or driving licence, an online or other proof of your right to work, utility bills)
- records of safeguarding checks which we have undertaken including the number of the Disclosure and Barring Service Certificate we received, a record that we confirmed your identity, the documents you supplied which allowed us to do this, and your right to work in the UK including any visa which you may hold
- contract information (such as the number of hours you have been contracted for, the amount to be paid for each hour, the dates of your engagement, billing and payment)
- characteristics (such as whether you have a disability, your gender, your race or ethnicity, your religion or belief, your sexual orientation, the languages you speak)



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- employment information (such as attendance records, disciplinary records, performance management information, appraisal records and training records, data created in the course of your duties)
- skills and experience information (such as details you provided as part of your application to join us, your CV, details of your employment history, references provided by previous employers or others, results of selection tests and notes made at the selection activities you took part in)
- medical information (such as doctor contact details, relevant medical conditions, fit notes received from your doctor and reports from the Occupational Health)
- contract information (such as your start date, your salary history and current salary, terms and conditions of employment, income tax and national insurance contributions, membership of pension schemes, other employment benefits)
- activity information (such as emails, IT logs, access logs, CCTV, and documents created or captured in the course of your employment)

2. Why do we hold your information?

We use this information to

- ensure that the EM Normandie UK Campus can function
- provide members of staff or contractors with the means to access our premises
- ensure the proper execution of duties in the role for which a member of staff or contractor has been employed or engaged
- facilitate the development of employment policies and strategies
- ensure compliance as a provider of Education in the UK in a wider sense and in particular as a provider of Higher Education subject to the rules and regulations outlined by the Office for Students as the independent regulator of Higher Education Providers in the UK
- ensure compliance with international accreditation bodies and degree awarding institutions
- enable IT functions and support
- comply with any contractual obligations
- pay you for the work you have undertaken
- engage providers of employment benefits such as Private Health Care, Income Protection, Life Insurance
- ensure compliance with Pension Regulations
- ensure compliance with Safeguarding and Prevent guidance
- ensure adherence to our contractual obligations as a tenant
- deduct from your income any amounts due to us as well as income tax and national insurance contributions, pension and any other contributions, whether due by law or agreed with you, and remit them to Her Majesty's Revenue and Customs (HMRC) and/or any other organisation to which they are due
- comply with any legal obligation with regards to requests from agencies such as the police, local authority, the court and tribunal system, the NHS, etc.
- any other circumstance in which we are required to use information and there exists a lawful basis for us to do so



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3. The lawful basis for using this information

Under the UK General Data Protection Regulation (UK GDPR), the lawful basis we rely on for processing this information are,

- your consent. You are able to remove your consent at any time. You can do this by contacting the Office Manager or the Principal at EM Normandie UK Limited, Jericho Building, Oxpens Road, Oxford, OX1 1SA, or
- we have a contractual obligation, or
- we have a legal obligation, or
- we have a vital interest, or
- we need it to perform a public task, or
- we have a legitimate interest

4. Collecting staff and contractors' information

The majority of information you provide to us is necessary for us to meet our obligations as an employer or within the context of alternative contractual agreements between us and failure to supply such information may mean that we are unable to fulfil our contract of employment or service contract with you.

We may from time to time ask you to provide us with information on a voluntary basis. When this is the case, it will be clearly explained, and you do not have to give us this information.

In some circumstances, we may want to obtain information regarding you (other than from third parties). We will normally seek your consent before obtaining such information.

5. Storing staff information

We store staff information securely and in line with our Data Protection Policy. A copy of our Data Protection Policy and associated procedures can be obtained from your supervisor or can be accessed on the company's website. A copy of Activate Learning's policy on data protection regarding tenants' employees can be found on their website at www.activatelearning.ac.uk/who-we-are/privacy-and-data-protection/

6. We hold staff information for the following timeframes

We will retain your personal information for a period of 10 years from the date you leave our employment/engagement unless we are advised or required to keep data for a longer period of time by law, by the ICO (Information Commissioner's Office) or in the context of our insurance arrangements. Please see details of specific retention times below. You can contact your supervisor or the person responsible for HR if you would like more information regarding this.

- 20 years
 - Parental leave information : 20 years after the birth of the child
 - Pension records: 20 years after the benefit ceases
 - Pension scheme investment policies: 20 years from the ending of any benefit payable under the policy



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- 50 years (in line with our insurers' requirements)
 - Employment and engagement applications, references, identity verification records, Disclosure and Barring Service or similar Statutory Disclosure reference numbers and pertinent related correspondence
 - Records (yearly) of training delivered to all relevant personnel regarding our safeguarding policy and its Updates
 - Records of any abuse allegations or incidents and action taken including notifications to the appropriate authorities
 - Copies of relevant information and accompanying correspondence relating to abuse assault or molestation of children or vulnerable adults whilst in our care or responsibility, or allegations made against you to this effect.
- Until the individual's 100th birthday (in line with the ICO's suggested retention schedule)
 - Records in relation to the termination of employment, e.g. early retirement, severance or death in service
- Permanently
 - Senior executives' records in relation to the company, (that is, those on a senior management team or their equivalents) such as company incorporation documents, shareholdings, resolutions, memorandum of articles, annual returns, register of directors' interests, share documents, accounts, liability policies, pension scheme documents
- Assessments under health and safety regulations

7. We routinely share staff and contractors' information with

- Activate Learning (our landlords)
- Pension providers and advisors (e.g., Scottish Widows, Salvus Pension Trust – Altyx Financial Planning Ltd, etc.)
- Solicitors
- Occupational Health providers
- HMRC
- Courts and Tribunal Services
- Department of Work and Pensions
- Auditors (KLSA LLP)
- Accountants (e.g., TaxAgility)
- Private Health, Income Protection and other employee benefits insurance providers
- Banks e.g. (HSBC, CIC)
- BACS
- Payroll providers
- HR advisors
- Disclosure and Barring Service
- UK Visa and Immigration Services, where appropriate
- Debt recovery agencies if you fail to settle a debt with us and we are unable to work with you to achieve a solution
- IT support and security services (e.g., EMN France, Cloud Controlled)
- Insurance and Employee benefit brokers (e.g., Marsh, Mercer)
- Insurers (e.g., Ecclesiastical, Markel, Bupa, Canada Life, etc.)
- Accreditation agencies and organisations (e.g., Office for Students, QAA, OIA, EFMD, AACSB, ASIC, BSIS, etc.)



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- Degree awarding instances and regulatory bodies in France (e.g., Ministère de l'Éducation Nationale)
- Organisations in relation to our registration as Higher Education Provider in the UK and as potential Student Visa sponsor licensee and those who provide support in our dealings with these organisations (e.g., the Office for Students, Hesa, Prevent, UKVI, Holmes and Partners, etc.)
- Other organisations or agencies appointed by government for specific tasks

We do not share information about our staff and contractors with anyone unless it is necessary and in line with the lawful basis for processing listed above, or with the consent of the person concerned.

Employees' and contractors' contact details (such as name, job title, email address and/or phone number) may be shared with external partners and, in some cases, published on the website, as required for the execution of their duties.

In order to facilitate effective workings across the EM Normandie Group worldwide, your professional information, including contact details and photographs, may be shared internally throughout the Group (that is to say: with the parent organisation in France as well as EM Normandie operations in other countries), including within Group-wide communications such as the newsletter.

8. Your data protection rights

Under data protection law, you have rights including

- your right of access - You have the right to ask us for copies of your personal information
- your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete
- your right to erase - You have the right to ask us to erase your personal information in certain circumstances
- your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances
- your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances
- your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances
- you are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you

9. Contact

In order to exercise one of these rights or to discuss anything in this privacy notice, please contact the Office Manager or the Principal at

EM Normandie UK Limited
Jericho Building
Oxpens Road
Oxford
OX1 1SA
Tel: 01865 681 412

or

The company's DPO (Data Protection Officer),

Melissa Gleyo
dpo@em-normandie.fr

10. Concerns

If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office on tel. 0303 123 1113.

Annex 1 - control table

Version	v1	Name	Role	Date
Created by :		Birgit Muller	Office Manager	Aug 2021
Approved by :		Miriam Schmidkonz, Principal		
Version	v2	Name	Role	Date
Amended by :		Birgit Muller	Office Manager	Feb 2023
Changes approved by :		Miriam Schmidkonz, Principal		
Version	v3	Name	Role	Date
Amended by :		Birgit Muller	Office Manager	Aug 2024
Changes approved by :		Miriam Schmidkonz, Principal		
Version	v4	Name	Role	Date
Reviewed by:		Birgit Muller	Office Manager	Aug 2025
		Changes to DPO, additional organisations (e.g., OfS), collection of Right to Work and documents proving identity and address		
Approved by :		Miriam Schmidkonz, Principal		
Version		Name	Role	Date
Reviewed by:		Birgit Muller	Office Manager	Feb 2023
Changes approved by :		Miriam Schmidkonz, Principal		
Version		Name	Role	Date
Reviewed by:		Birgit Muller	Office Manager	Aug 2024
Changes approved by :		Miriam Schmidkonz, Principal		