

WORKFORCE PRIVACY NOTICE

About this privacy notice

This privacy notice has been written to provide you with information about how London Luton Airport Limited (trading as Luton Rising) (“Luton Rising”, “we”, “us”, “our”) handles or intends to handle personal information relating to our workforce in accordance with the UK General Data Protection Regulation (“**UK GDPR**”). This notice relates specifically to our collection and use of personal information of our workforce, including all employees, workers, consultants and contractors.

This notice applies to current and former employees, workers, consultants and contractors. This notice does not form part of any contract of employment or other contract to provide services.

About us

We are London Luton Airport Limited, trading as Luton Rising. We are a private limited company (company number 02020381). Our registered office address is Hart House Business Centre, Kimpton Road, Luton, LU2 0LA. We are registered as a data controller with the Information Commissioner’s Office and our registration number is ZA535129.

We aim to process information about you fairly, lawfully, and in a transparent manner. The aim of this notice is to provide you with sufficient information for you to be able to understand what we are doing with your information. If you are unsure how we are handling information about you or you think we could improve our privacy information, please let us know.

Information we collect

We collect store and hold a range of information about you during the course of our relationship including the following categories of personal information:

- Contact details including your name, email address, postal address and telephone numbers.
- Personal details such as your date of birth and your gender.
- Next of kin and emergency contact details.
- National insurance number.
- Bank account details, payroll records and tax status information.
- Salary, annual leave, pension and benefits entitlement.
- Day rate, or other agreed rates of pay, in relation to consultants and contractors.
- Start date and leaving date.
- 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, holidays, training records and professional memberships).
- Performance information.
- Disciplinary and grievance information.
- Information about your use of our ICT systems.
- CCTV footage.
- Photographs.

Sensitive personal information we collect

We may also collect, store and use the following more sensitive types of personal information (known as “special category data”):

- Information about your race or ethnicity, religious beliefs, sexual orientation, and political opinions.
- Trade union membership.
- Information about your health, including any medical condition and sickness records.

How information is collected

We collect personal information about employees, workers, consultants and contactors through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies.

We will collect additional personal information in the course of job-related activities throughout the period of you working for us.

Purposes for processing

We have set out below a description of all the ways we plan to use your information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. We may process your information for more than one lawful ground depending on the specific purpose for which we are using your information.

Purpose/Activity	Type of Information	Lawful Basis for Processing Information
To make a decision about your recruitment or appointment	Contact details Personal details Rates of pay Recruitment information	Performance of a contract
To determine the terms on which you work for us	Contact details Personal details Rates of pay Recruitment information	Performance of a contract
To ensure you are legally entitled to the work in the UK	Contact details Personal details Recruitment information	Performance of a legal obligation
To pay you and, if you are an employee or deemed employee for tax purposes, deducting tax and National Insurance contributions	Contact details Personal details National insurance details Bank, payroll and tax details	Performance of a legal obligation Performance of a contract
To provide benefits to you	Contact details Personal details Employment records or terms	Performance of a contract

	of service	
To enrol you in a pension arrangement in accordance with our statutory automatic enrolment duties	Contact details National insurance number Bank, payroll and tax details	Performance of a legal obligation
To administer the contract we have entered into with you	Contact details Personal details Employment records or terms of service	Necessary to comply with our legal obligations Necessary for our legitimate interests to run our business, provision of IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise
For business management and planning, including accounting and auditing	Contact details Personal details Employment records or terms of service Salary or payment details	Necessary for our legitimate interests to run our business and manage our workforce
To conduct performance reviews, managing performance and determining performance requirements	Contact details Personal details Employment records or terms of service Performance information	Necessary for our legitimate interests to run our business and manage our workforce
To make decisions about your continued employment or engagement	Contact details Personal details Employment records or terms of service Performance information	Necessary for our legitimate interests to run our business and manage our workforce
To make arrangements for the termination of our working relationship	Contact details Personal details Employment records or terms of service Performance information	Performance of a contract Necessary for our legitimate interests to run our business and manage our workforce
For education, training and	Contact details	Performance of a legal

development requirements	Personal details Employment records or terms of service Performance information Training records	obligation Performance of a contract
To monitor your use of our information and communication systems to ensure compliance with our data protection and security policies	Contact details Personal details Details of ICT use	Necessary for our legitimate interests to run our business, provision of IT services and to ensure network security
To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution	Contact details Personal details Details of ICT use	Necessary for our legitimate interests to run our business, provision of IT services and to ensure network security

Purposes for processing – Sensitive personal information

We have set out below a description of all the ways we plan to use your information, and which of the legal bases we rely on to do so

Purpose/Activity	Type of Information	Lawful Basis for Processing Information
To ascertain your fitness to work	Contact details Personal details Health and medical information	Performance of a legal obligation
To manage sickness absence	Contact details Personal details Health and medical information	Performance of a legal obligation
To comply with health and safety obligations	Contact details Personal details Health and medical information	Performance of a legal obligation
To make reasonable adjustments	Contact details Personal details Health and medical information	Performance of a legal obligation
To ensure meaningful equal	Information about your race or	Performance of a task in the

opportunity monitoring and reporting	national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation	public interest
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Sharing personal information

Where necessary or required, we may share your personal information as follows:

- With third party service providers, in connection with services performed on our behalf. For example, our IT provider, payroll provider and pension administration.
- With government bodies and law enforcement agencies.
- With third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

This list is not exhaustive as there are other circumstances where we may also be required to share information, for example:

- To meet our legal obligations.
- In connection with legal proceedings (or where we are instructed to do so by Court order).

Our relationships with third party services providers are governed by contractual provisions with us and they only have access to personal information to perform the described purposes and may not use it for other purposes.

Where we store personal information

The personal information that we collect is stored within the UK and European Economic Area (EEA). However, there may be some circumstances where it is necessary to transfer and store personal information at a destination outside the UK or the EEA. In these circumstances, we will take all steps reasonably necessary to ensure that personal information is treated securely and in accordance with data protection law and, in the event that personal information is transferred outside the UK or the EEA, shall ensure that this is carried out subject to the requirements of the UK GDPR.

How long we keep it for

We will only retain 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. For information collected in relation your engagement with Luton Rising, this will usually be kept for a period of up to 6 years following the termination of our working relationship.

Your rights

Under the UK GDPR and the Data Protection Act 2018, you have the following rights:

- **Right of access** - You have the right of access to information we hold about or concerning you.
- **Right of rectification or erasure** - If you feel that any data that we hold about you is inaccurate you have the right to ask us to correct or rectify it. You also have a right to ask us to erase information about you where you can demonstrate that the data we hold is no longer needed by us, or if you withdraw the consent upon which our processing is based, or if you feel that we are unlawfully processing your data.
- **Right to restriction of processing** – In certain circumstances, you have a right to request that we refrain from processing your data.

- **Right of portability** – In certain circumstances, you have a right to receive any personal data that you have provided to us in order to transfer it onto another data controller.
- **Right to object** – In certain circumstances, you have a right to object to our processing of your personal data.
- **Right to withdraw consent** - In the circumstances where you may have provided consent to the collection, processing and transfer of personal information for a specific purpose has been provided, you have the right to withdraw consent for that specific processing at any time.

Please note, there are some specific circumstances where these rights do not apply and we can refuse to deal with your request.

To exercise any of these rights, please contact Luton Rising's Data Protection Officer using the contact details below.

Complaints

If you have a concern about the way we are collecting or using personal information, we would ask that you raise your concern with us in the first instance by using the contact details below.

You also have a right to lodge a complaint with the Information Commissioner's Office (ICO) should you feel that we have not handled your information in line with legislative and regulatory requirements. They can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
0303 123 1113 | www.ico.org.uk

Contact Details

For further information on how to request your personal information, exercise any of your data protection rights or request further information in relation to how and why we process your information, you can contact us by emailing the Data Protection Officer at DataProtection@lutonrising.org.uk.

Alternatively, you can write to the Data Protection Officer at the following address:

Data Protection Officer
Hart House Business Centre
Kimpton Road
Luton
LU2 0LA

Changes to this privacy notice

We may change this privacy notice from time to time. This privacy notice was last updated in April 2022.