

Employee and Associate Privacy Policy

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Other Related Documents

Data Protection Policy
Data Retention Policy

Information Security Manual
Information Security Policy

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The document owner is Jon Russell, The Information Security Director, while the Information Security Director retains responsibility for approving the document the annual review and update may be delegated to the Information Security Manager.

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1. Data Controller

Moorhouse Consulting (“**Moorhouse**”)
Dashwood House
69 Old Broad Street
London
EC2M 1QS

2. Description and Scope of Data Processing

What information does Moorhouse collect?

Moorhouse collects and processes a range of information about you, depending on whether you are an employee of Moorhouse or an independent contractor. This includes:

- your name, address and contact details, including email address and telephone number, date of birth and gender;
- the terms and conditions of your employment if you are an employee of Moorhouse or engagement if you are not an employee of Moorhouse;
- details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with Moorhouse if you are an employee of Moorhouse and/or clients if you are not an employee of Moorhouse;
- information about your remuneration, or fees if you are not an employee, including entitlement to benefits such as pensions or insurance cover;
- details of your bank account and national insurance number;
- information about your marital status, next of kin, dependents and emergency contacts;
- information about your nationality and entitlement to work in the UK;
- information about your criminal record;
- if you are an employee of Moorhouse, details of your schedule (days of work and working hours) and attendance at work;
- photographs and videos;
- if you are an employee of Moorhouse, details of periods of leave taken by you, including holiday, sickness absence, family leave and sabbaticals, and the reasons for the leave;
- if you are employee of Moorhouse, details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence;
- if you are employee of Moorhouse, assessments of your performance, including appraisals, performance reviews and ratings, training you have participated in, performance improvement plans and related correspondence; and
- if you are employee of Moorhouse, information about medical or health conditions, including whether or not you have a disability for which Moorhouse needs to make reasonable adjustments;

Moorhouse collects this information in a variety of ways. For example, if you are an employee of Moorhouse, data is collected from: (a) application forms, CVs or resumes; (b) your passport or other identity documents such as your driving licence; (c) forms completed by you at the start of or during employment (such as benefit nomination forms); (d) correspondence with you; and (e) interviews, meetings or other assessments.



In some cases, Moorhouse collects personal data about you from third parties. For example, if you are an employee of Moorhouse, the information collected from third parties will include references from former employers, information from employment background check providers, information from credit reference agencies and information from criminal records checks permitted by law. Moorhouse seeks information from third parties with your consent only.

Data is stored in a range of different places, including in your personnel file, in Moorhouse's HR management systems and in other IT systems (including Moorhouse's email system).

3. Purpose of Data Processing

Why does Moorhouse process personal data?

If you are an employee of Moorhouse, there will be a need to process your data for Moorhouse to enter into an employment contract with you and to meet its obligations under your employment contract if applicable. For example, it needs to process your data to provide you with an employment contract, to pay you in accordance with your employment contract and to administer benefit, pension and insurance entitlements. Similarly, if you are not an employee of Moorhouse, there will be a need for Moorhouse to process your personal data in order to administer a consultancy agreement through which a consultancy company supplies your services.

In some cases, Moorhouse needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check an employee's entitlement to work in the UK, to deduct tax, to comply with health and safety laws and to enable employees to take periods of leave to which they are entitled. For all positions, it is necessary to carry out criminal records checks to ensure that individuals are permitted to undertake the role.

In other cases, Moorhouse has a legitimate interest in processing personal data before, during and after the end of the employment relationship. Processing employee data allows Moorhouse to;

- run recruitment and promotion processes;
- maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency), and records of employee contractual and statutory rights;
- operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace;
- operate and keep a record of employee performance and related processes, to plan for career development, and for succession planning and workforce management purposes;
- operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled;
- obtain occupational health advice, to ensure that it complies with duties in relation to individuals with disabilities, meet its obligations under health and safety law, and ensure that employees are receiving the pay or other benefits to which they are entitled;
- operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to allow effective workforce management, to ensure that Moorhouse complies with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled;
- ensure effective general HR and business administration;
- provide references on request for current or former employees;
- respond to and defend against legal claims;



- maintain and promote equality in the workplace.

If a consultancy company is supplying your services to Moorhouse, there will be a need for Moorhouse to process your personal data in order to facilitate Moorhouse's legitimate business interest as a client of that consultancy company.

Where Moorhouse relies on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of employees or workers and has concluded that they are not.

Some special categories of personal data, such as information about health or medical conditions, is processed to carry out employment law obligations (such as those in relation to employees with disabilities, processing sick pay and for health and safety purposes).

4. Legal Basis for the Processing of Personal Data

Insofar as we obtain your consent for the processing of personal data, Art. 6 para. 1 lit. a GDPR serves as the legal basis.

In the processing of personal data required for the performance of a contract (such as your employment contract if you are an employee of Moorhouse), Art. 6 para. 1 lit. b GDPR serves as the legal basis. This also applies to processing operations required to carry out pre-contractual measures (for example, in the context of an application procedure). Similarly, if your services are being supplied to Moorhouse through a consultancy company, the same legal basis is relied upon by Moorhouse in order to facilitate its rights and obligations under that consultancy agreement.

Insofar as the processing of personal data is required to fulfil a legal obligation to which Moorhouse is subject, Art. 6 para. 1 lit. c GDPR serves as the legal basis.

If processing is necessary to safeguard a legitimate interest of Moorhouse or a third party and if the interests, fundamental rights and freedoms of the data subject do not outweigh the first-mentioned interest, Art. 6 para. 1 lit. f GDPR serves as the legal basis for processing.

5. Transfer of Personal Data

Who has access to data?

For the purposes described, we reserve the right to pass on your personal data to companies affiliated with us and/or service providers commissioned by us, if this is necessary and appropriate, taking into account your interests and those of Moorhouse or if such a passing on is necessary in order to enforce our rights in accordance with Art. 6 para. 1 sentence 1 f GDPR.

Otherwise, personal data will only be disclosed to third parties pursuant to Art. 6 para. 1 sentence 1 lit. a GDPR if we have your express consent, if we are legally obliged to do so pursuant to Art. 6 para. 1 sentence 1 lit. c GDPR or if this is required by Art. 6 para. 1 sentence 1 lit. b GDPR for the processing of contractual relationships with you. If you are an employee of Moorhouse, your information will be shared internally, including with members of the HR and recruitment team (including payroll), your line manager, managers in the business area in which you work and IT staff if access to the data is necessary for



performance of their roles. If you are not an employee, your information will be shared with your client point of contact at Moorhouse for the purpose of receiving services through your consultancy company.

Moorhouse shares your data with third parties in order to obtain pre-employment references from other employers, obtain employment background checks from third-party providers and obtain necessary criminal records checks from the Disclosure and Barring Service. Moorhouse may also share your data with third parties in the context of a sale of some or all of its business. In those circumstances the data will be subject to confidentiality arrangements.

Moorhouse also shares your data with third parties that process data on its behalf, in connection with payroll, the provision of benefits and the provision of occupational health services.

6. Data Security

How does Moorhouse protect data?

Moorhouse takes the security of your data seriously. Moorhouse has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties. Moorhouse takes the security of your data seriously. Moorhouse has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties. Moorhouse is accredited to Cyber Essentials Plus to ensure that it follows best practice for system security; it provides regular Information Security training to all employees; and access to personal data is restricted to those employees who need it to perform their duties. Our security measures are continuously improved in line with technological developments.

Where Moorhouse engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

7. Data Erasure and Secure Storage Duration

For how long does Moorhouse keep data?

The personal data of the person concerned will be deleted or blocked as soon as the purpose of secure storage ceases to apply. Furthermore, data may be stored if this has been provided for by the European or national legislator in EU regulations, laws or other provisions to which the person responsible is subject. The data will also be blocked or deleted if a secure storage period prescribed by the aforementioned standards expires, unless there is a need for further secure storage of the data for the conclusion or fulfilment of a contract.

8. Rights of the Data Subject



As a data subject, you have the following different rights:

8.1 Information Rights

You have the right to request information about your personal data processed by us in accordance with Art. 15 GDPR. In particular, you may request information about the purposes of processing, the category of personal data, the categories of recipients to whom your data have been or will be disclosed, the planned secure storage period, the existence of a right to rectification, deletion, restriction of processing or objection, the existence of a right of appeal, the origin of your data, if these have not been collected by us, and the existence of automated decision-making including profiling and, if applicable, meaningful information on their details.

8.2 Right of Correction

In accordance with Art. 16 GDPR, you have the right to demand the correction of incorrect or complete personal data stored by us without delay.

8.3 Right of Deletion

In accordance with Art. 17 GDPR, you have the right to request the deletion of your personal data stored with us, unless the processing is necessary to exercise the right to freedom of expression and information, to fulfil a legal obligation, for reasons of public interest or to assert, exercise or defend legal claims.

8.4 Right of Limitation of Processing

In accordance with Art. 18 GDPR, you have the right to demand the restriction of the processing of your personal data if you dispute the accuracy of the data, if the processing is unlawful, but you refuse to delete it and we no longer need the data, but you need it to assert, exercise or defend legal claims or if you have filed an objection against the processing in accordance with Art. 21 GDPR.

8.5 Right to Data Transferability

In accordance with Art. 20 GDPR, you have the right to receive the personal data you have provided to us in a structured, current and machine-readable format or to request its transfer to another person responsible.

8.6 Right to Revoke the Data Protection Declaration of Consent

According to art. 7 para. 3 GDPR you have the right to revoke your declarations of consent under data protection law at any time. As a result, we will no longer be allowed to continue processing data based on this consent. The revocation of consent shall not affect the legality of the processing carried out on the basis of the consent until revocation.

8.7 Right of Appeal to a Supervisory Authority

You have the right to complain to a supervisory authority pursuant to Art. 77 GDPR. As a rule, you can contact the supervisory authority at your usual place of residence or workplace or at our company headquarters.

8.8 Right of Objection



If your personal data are processed on the basis of legitimate interests pursuant to Art. 6 para. 1 sentence 1 lit. f GDPR, you have the right to object to the processing of your personal data pursuant to Art. 21 GDPR, provided that there are reasons for this arising from your particular situation or the disagreement regarding direct mail. In the latter case, you have a general right of objection, which we will implement without specifying a particular situation.

If you would like to make use of your right of revocation or objection, a corresponding notification via all known communication channels is sufficient.

8.9 Automated Decision in Individual Cases Including Profiling

You have the right not to be subject to a decision based exclusively on automated processing - including profiling - that has legal effect against you or significantly impairs you in a similar manner. This does not apply if:

1. if the decision is necessary for the conclusion or performance of a contract between you and the person responsible,
2. the legislation of the Union or of the Member States to which the person responsible is subject is admissible and that legislation contains appropriate measures to safeguard your rights, freedoms and legitimate interests; or
3. you have given your express consent.

However, these decisions may not be based on special categories of personal data pursuant to Art. 9 para. 1 GDPR, unless Art. 9 para. 2 lit. a or g GDPR applies and appropriate measures have been taken to protect your rights and freedoms and your legitimate interests.

In the cases referred to in (1) and (3), the person responsible shall take reasonable measures to safeguard your rights, freedoms and legitimate interests, including at least the right to obtain the intervention of a person by the person responsible, to state his own position and to challenge the decision.

If you would like to exercise any of these rights, please contact Irene Oldham at ireneoldham@moorhouseconsulting.com

If you believe that Moorhouse has not complied with your data protection rights, you can complain to Jon Russell jonrussell@moorhouseconsulting.com or Information Commissioner (ICO).

What if you do not provide personal data?

You have some obligations under your employment contract to provide Moorhouse with data. In particular, you are required to report absences from work and may be required to provide information about disciplinary or other matters under the implied duty of good faith if you are an employee. You may also have to provide Moorhouse with data in order to exercise your statutory rights if applicable, such as in relation to statutory leave entitlements. Failing to provide the data may mean that you are unable to exercise your statutory rights if applicable.

Certain information, such as contact details, your right to work in the UK and payment details, have to be provided to enable Moorhouse to enter a contract of employment with you if applicable. If you do not provide other information, this will: (a) if you are an employee of Moorhouse, hinder Moorhouse's ability to administer the rights and obligations arising as a result of the employment relationship efficiently if



applicable; or (b) If you are not an employee of Moorhouse, hinder or prevent Moorhouse from accepting services supplied from your consultancy company.

9. Updating and Changing this Privacy Notice

This data protection information is currently valid and is valid as of May 2018.

Due to the further development of our processes and procedures or due to changed legal or official requirements, it may become necessary to change these data protection notices.

10. Policy Enforcement

Violation of this policy may result in your access to Moorhouse ICT systems using your personal device being revoked. It may also lead to disciplinary action being taken against you in accordance with the company's disciplinary policies.

