

Privacy Policy (Employees and Contractors)



Together

We are **Clemark Group**,

Registered in England & Wales under **Associate Enterprises Limited** and including all wholly owned subsidiaries. We also trade as Assent, Lorators, Clemark.

Our integrated management system covers the provision of consultancy, auditing, training, creative, technology and other professional services delivered in-person and remotely to ensuring the quality of products/services and the security of all information.

1. Who We Are

Associate Enterprises Limited (“we”, “us”, “our”) provides consultancy, audit services, online platforms (including LMS services) and other professional services.

We are the **data controller** for the personal data described in this Privacy Policy.

Contact details

Email: desk@assent1.com

Address Details see <https://www.clemarkgroup.com/about/>

2. Scope of This Policy

This policy applies to:

- Employees
- Workers and contractors
- Job applicants (where relevant to employment records retained)

3. The Personal Data We Collect

We process the following categories:

3.1 Core Employment Data

- Name and contact details
- Employment contract details
- Job role and organisational data

3.2 Payroll & Financial Data

- Bank details
- Salary and pay records
- Tax and National Insurance details
- Pension information

3.3 HR Records

- Personnel files
- Performance records
- Annual leave records
- Training and development records

3.4 Absence & Health Data (Special Category)

- Sick leave records

- Health-related absence information

Processed under:

- Article 9(2)(b) UK GDPR and Schedule 1 DPA 2018 employment condition

3.5 Recruitment Data

For successful candidates:

- Contact details
- Employment history
- Qualifications
- References

For diversity monitoring (where applicable):

- Ethnicity
- Disability information

Special category data is processed in line with employment law obligations.

3.6 Contractor / Consultant Data

- Contact details
- Qualifications
- Skills, experience and project history

Typically retained for up to **7 years after last engagement**.

4. How We Use Your Personal Data

We use employee and contractor data to:

Purpose	Lawful Basis
Manage employment contracts	Article 6(1)(b) – Contract
Pay employees and meet tax obligations	Article 6(1)(c) – Legal obligation
Manage HR records and performance	Article 6(1)(b) – Contract
Monitor absence and workforce wellbeing	Article 6(1)(b) + Article 9(2)(b)
Recruitment and onboarding	Article 6(1)(b) or (a)
Maintain workforce diversity data	Article 9(2)(b)
Engage and manage contractors	Article 6(1)(a) or (b)

5. Special Category Data

We process limited special category data such as:

- Health (sickness absence)
- Diversity data (ethnicity, disability)

This is processed:

- For employment law purposes
- Under appropriate safeguards
- In line with Schedule 1 of the Data Protection Act 2018

6. Where We Get Personal Data From

We collect personal data from:

- You directly
- Recruitment processes (including references)
- Recruitment platforms (e.g. Indeed)
- Previous employers (where applicable)

7. Sharing Your Personal Data

We may share your data with:

7.1 Group Companies and Affiliates

We may share personal data within our corporate group, including:

- Parent companies
- Subsidiaries
- Affiliated or related companies

This is for purposes such as:

- Delivering our services
- Internal administration
- Business operations and reporting

All group companies are required to:

- Process personal data in accordance with this Privacy Policy
- Apply appropriate security and confidentiality controls

7.2 External Providers

- Payroll providers
- Pension providers
- HR and recruitment systems
- Accounting systems (e.g. for reporting to HMRC)

7.3 Authorities

- HMRC
- Regulatory bodies

7.4 Internal Access

- HR personnel
- Line managers (as necessary)
- Internal auditors

All sharing is controlled and limited to what is necessary.

8. International Transfers

Where systems are cloud-based, your data may be processed outside the UK.

We ensure safeguards such as:

- UK adequacy regulations
- Standard contractual clauses

9. Data Retention

We retain employee and contractor data as follows:

Data Type	Retention
Personnel files	6 years after employment ends
Payroll data	3–6 years post-employment
Pension records	Up to 75 years
Financial records	Minimum 7 years
Recruitment data (unsuccessful)	6 months
Contractor data	Up to 7 years after last engagement

10. Data Security

We implement appropriate technical and organisational measures, including:

- Encrypted storage and transfer
- Access controls and role-based permissions
- Restricted HR and finance systems

11. Your Rights

You have the following rights under UK GDPR:

- Access your personal data
- Correct inaccurate information
- Request deletion (where applicable)
- Restrict processing
- Object to processing
- Data portability (where applicable)

Some rights may be limited where data must be retained for legal obligations (e.g. tax records).

12. Automated Decision-Making

We do **not carry out automated decision-making or profiling** affecting employees or contractors.

13. Data Protection Responsibilities

Employees and contractors are required to:

- Handle personal data in line with company policies
- Maintain confidentiality
- Report any data breaches promptly

14. Complaints

If you are unhappy with how we handle your data, you can contact us first:

<https://assentuk.freshdesk.com/support/tickets/new>.

We will acknowledge your complaint within 30 days and investigate without delay. We will provide a response to your complaint and communicate the outcome.

If you are not satisfied with our response, you have the right to submit a complaint to the Information Commissioner's Office (ICO):

Website: <https://www.ico.org.uk>

Telephone: +44303 123 1113

15. Updates to This Policy

We may update this policy periodically. The latest version will be provided internally.