

## WHAT IS THE PURPOSE OF THIS DOCUMENT?

Post Office Limited is committed to protecting the privacy and security of your Personal Information.

This privacy notice describes how we collect and use personal information about you during and after your engagement with the Post Office Agent, in accordance with Data Protection legislation, and is applicable to all Agents' Assistants.

Post Office Limited is a "data controller". This means we are responsible for ensuring that when you entrust your personal information to us we hold and use that personal information solely for business purposes. This notice applies to Agents' Assistants. We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so you are aware of how and why we are using such information.

## DATA PROTECTION PRINCIPLES

Post Office Limited will comply with Data Protection Legislation. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up-to-date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

## THE INFORMATION WE HOLD ABOUT YOU

Personal information, or personal data, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data that require a higher level of protection.

We will collect, store and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers and personal email addresses.
- Date of birth.

- Gender.
- Marital Status
- Location of Post Office
- Employment history, employment conduct and appeals information.
- CCTV footage Information about your use of our information and communications systems.
- We may also collect, store and use the following “special categories” of more sensitive personal information:
- Information about criminal convictions and offences.

### **HOW IS YOUR PERSONAL INFORMATION COLLECTED?**

We collect personal information about Agents' Assistants through your application to work for a Post Office Agent and through your employment with the Agent. Post Office will receive information from a vetting background check provider. We collect additional information from third parties including: former employers, government agencies, the Courts, law enforcement agencies, credit reference agencies or other background check agencies.

### **HOW WE WILL USE INFORMATION ABOUT YOU**

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to comply with a legal obligation.
2. Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your vital interests (or someone else's interests).
2. Where it is needed in the public interest.

### **Situations in which we will use your personal information**

We need all the categories of information in the list above primarily to allow us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests of our own provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

- Making a decision about your ability to sell Post Office products and services.
- Checking you are legally entitled to work in the UK.
- Making decisions about your continued appointment.
- Compliance training.
- Dealing with legal disputes involving you including accidents and complaints.
- For the security, equality, health and safety obligations.
- To prevent fraud.
- To monitor your use of our information and communication systems to ensure compliance with our IT policies.
- To ensure network and information security, including preventing unauthorised access to our computer and

electronic communications systems and preventing malicious software distribution.

Some of the above grounds for processing will overlap and there may be several grounds that justify our use of your personal information.

### **If you fail to provide Personal Information**

If you fail to provide certain information when requested, we may not be able to proceed with your appointment or we may be prevented from complying with our legal obligations.

### **Change of purpose**

We will only use your personal information for the purposes we collected it for, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis that allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION**

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations and in line with our Protecting Personal Data Policy.
3. Where it is needed in the public interest, and is in line with our Protecting Personal Data Policy.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public

### **Do we need your consent?**

We may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information we would like and the reason we need it, so you can carefully consider whether you wish to consent. You should be aware that it is not an obligatory requirement that you agree to any request for consent from us.

## **INFORMATION ABOUT CRIMINAL CONVICTIONS**

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our protecting personal data policy.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal

claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We may also process such information about members or former members in the course of legitimate business activities with the appropriate safeguards.

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the Agents' Assistant vetting and security check process, or we may be notified of such information directly by you in the course of your engagement with the Agent. We will use information about criminal convictions and offences in the following ways:

- Suitability for selling Post Office products
- Ongoing suitability to offer Post Office services
- For security purposes.
- Fraud and anti-money laundering monitoring and detection.

We use your personal information about criminal convictions to comply with regulatory and statutory obligations placed upon Post Office Limited including anti-money laundering legislation, Proceeds of Crime Act, Regulatory Investigatory Powers Act and counter-terrorism.

#### **AUTOMATED DECISION-MAKING**

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

We do not envisage that any decisions will be taken about you using automated means; however we will notify you in writing if this position changes.

#### **DATA SHARING**

We share your data with third parties, including third-party service providers.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU.

If we do, you can expect a similar degree of protection in respect of your personal information.

#### **Why might you share my personal information with third parties?**

We will share your personal information with third parties where required by law, where it is necessary to administer the relationship with you or where we have another legitimate interest in doing so.

#### **Which third-party service providers process my personal information?**

"Third parties" includes third-party service providers (including contractors and designated agents). The following

activities are carried out by third-party service providers: credit referencing, criminal records checks, IT services, learning and development, security.

### **How secure is my information with third-party service providers?**

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **What about other third parties?**

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

### **Transferring information outside the EEA**

Where we transfer the personal information we collect about you outside the EEA in order to perform our contract with you, we will ensure that the necessary safeguards have been applied to the transfer including the use of Model Clauses, Consent, Binding Corporate Rules or Privacy Shield.

If you require further information about this, you can contact the Post Office Limited Data Protection Officer at [data.protection@postoffice.co.uk](mailto:data.protection@postoffice.co.uk)

## **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 Post Office employees, suppliers, 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. Details of these measures may be obtained from the Post Office Limited Data Protection Officer who can be contacted at [data.protection@postoffice.co.uk](mailto:data.protection@postoffice.co.uk).

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

## **DATA RETENTION**

### **How long will you use my information for?**

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. Details of retention periods for different aspects of your personal information are available in our retention policy which is available on request.

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

## **RIGHTS OF ACCESS, CORRECTION, ERASURE AND RESTRICTION**

### **Your rights in connection with personal information**

By law you may have the right to:

- **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 it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Information Rights Team in writing at [Information.rights@postoffice.co.uk](mailto:Information.rights@postoffice.co.uk).

#### **No fee usually required**

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 for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

#### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

#### **RIGHT TO WITHDRAW CONSENT**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Information Rights Team at [Information.rights@postoffice.co.uk](mailto:Information.rights@postoffice.co.uk). Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

#### **DATA PROTECTION OFFICER**

We have appointed a Data Protection Officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Data Protection Officer at [data.protection@postoffice.co.uk](mailto:data.protection@postoffice.co.uk). You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

## **CHANGES TO THIS PRIVACY NOTICE**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

**If you have any questions about this privacy notice, please contact the Data Protection Officer at [data.protection@postoffice.co.uk](mailto:data.protection@postoffice.co.uk).**

---

**END OF DOCUMENT**

This page is intentionally left blank.