



EUROPEAN HUMAN RESOURCES DATA PROTECTION POLICY

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Haines Business Systems Ltd
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Introduction

The company respects the privacy of individuals working for it and has created this policy to establish and maintain high standards of data protection for personal information – that it uses in the normal employment context – about its employees based in Europe.

This policy is consistent with the Data Protection Directive (95/46/EC) and has been designed to enable those parts of the company, operating within the European economic area to fulfil their obligations as “data controllers” under the Directive.

In broad terms, this policy describes what categories of personal information are processed by the company in connection with various employment-related purposes, how it is handled (both inside the company and when it is made available outside), and what rights you may have in connection with its processing. This policy further sets out the rules that must be complied with by all company employees in handling personal information.

In this policy, “personal information” refers to information which relates to an individual, and which identifies that individual, either directly or indirectly (together with other information that is reasonably likely to come into the company’s possession).

It is important that any parts of the Company that operate in specific countries throughout the European Economic Area register with the appropriate data protection authorities with respect to the processing of personal information as described in this policy. The company will strive to operate within applicable laws.

This policy applies to personal information about the company’s current and former employees, agency or freelance workers (to the extent that any personal information described is received by the company) and job applicants (successful and unsuccessful) who are employed, or engaged by, or applied for employment with, this company (including any subsidiaries that have been set up within the European Economic Area). For the purposes of this policy, this information is known collectively as “Worker Information”. This policy does not apply to personal information about individuals who are employed or engaged by related companies (either owned by, or associated with) to this company, set up outside the European