

Contact Details

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What is Data Protection?

Failure to protect personal data poses a risk to clients, to staff and to the reputation of the company, as well as risking financial penalties for the company. Fleet Alliance will:

- Comply with GDPR and current UK Data Protection law.
- Adopt best practices.
- Respect individuals' rights.
- Be open and honest with individuals whose data is held by the company.
- Provide training and support for staff who handle personal data, so that they can act confidently and consistently in relation to data protection.

What is Personal Data?

Personal data is any information that may allow an individual to be identified from that information. This includes information such as name, addresses, contact numbers, financial details, date of birth, National Insurance number, payment or bank details, etc.

Employee Data Protection

GDPR and Data Protection legislation relates to employee data as well as customer data. We respect your data and have taken additional steps to protect your personal data.

What data do we hold about employees?

There are two types of data that we may hold about employees:

- Personal Data
- Sensitive Personal (Special Category) Data

1. Personal Data

The types of personal data the company may hold about you includes:

Category of Data	Reason why we process this data (Purpose)	Lawful Basis for Processing (Article 6)	Retention Period
Title and Full Name	For staff records and contact purposes	Performance of a contract - Processing is necessary to fulfil the obligations under an employment contract.	Length of employment plus 6 years
Address Details	For staff records and contact purposes	Performance of a contract - Processing is necessary to fulfil the obligations under an employment contract.	Length of employment plus 6 years
Date of Birth/Age	To address benefit related queries where age is a relevant	Performance of a contract - Processing is necessary to fulfil the	Length of employment plus 6 years

	factor or for the purposes of applying our retirement policy	obligations under an employment contract.	
Marital Status	To address benefit related queries or for tax purposes	Performance of a contract and Compliance with a legal obligation	Length of employment plus 6 years
Recruitment records (including application forms, interview notes, scoring and employment/education history, CV)	For recruitment purposes	Legitimate Interests – we need to ensure employees are qualified and have the relevant experience to carry out the role.	1 year for unsuccessful candidates, length of employment plus 6 months for successful candidates
Identification Documentation, e.g. passport, proof of address documents	To confirm right to work, verify employees' identity and carry out background checks.	Compliance with a legal obligation – Processing is required to comply with the Immigration Act 2016.	Length of employment plus 2 years
Right to work information e.g. work permit, visa	To confirm right to work	Compliance with a legal obligation – Processing is required to comply with the Immigration Act 2016.	Length of employment plus 2 years
Contact Details	For contact purposes	Performance of a contract – Processing is necessary to fulfil the obligations under an employment contract, to contact employees with critical business updates or in the event of emergencies.	Length of employment plus 6 years
Emergency Contact / Next of Kin Details	For emergency contact purposes or for the administration of certain flexible company benefits	Emergency Contact: Legitimate Interests – we have a legal and ethical duty to ensure the safety and well-being of our employees while at work. Having emergency contact details helps fulfil this duty. It allows us to ensure the employee's wellbeing in the event of an illness, accident or emergency at work so that we can notify their next of kin. Flexible Benefits:	Length of employment

		Performance of a contract - Processing is necessary to fulfil the obligations under an employment contract.	
National Insurance Number	For payroll processing and tax purposes	Compliance with a legal obligation - Processing is required to comply with tax reporting	Length of employment plus 6 years
Bank Details	For payroll processing	Performance of a contract - Processing is necessary to fulfil the obligations under an employment contract.	Length of employment
Payroll records (including salary, overtime, expenses, bonus, etc)	For payroll processing and tax purposes	Performance of a contract - Processing is necessary to fulfil the obligations under an employment contract.	5 years after the end of tax year covered by the records
Financial Records Check	Annual fitness and propriety checks	<p>Senior Managers and Approved Persons: Compliance with a legal obligation - Processing is required to comply with FCA SM&CR regulations.</p> <p>All other employees: Legitimate Interests - as a regulated financial services firm, it is in our interests to ensure our staff are suitable to conduct regulated activities to protect customer data, vulnerable customers, our reputation and to prevent financial crime.</p>	<p>Background check 6 years post-employment</p> <p>Any adverse findings - length of employment</p>
Conflict of Interest declarations	To mitigate the risk of conflicts of interest	Compliance with a legal obligation - Processing is required to comply with FCA requirements	Length of employment plus 6 years
Performance / Training / Disciplinary Records	For performance management, employee training, and disciplinary procedures.	Legitimate Interests - we need to ensure that our employees perform their role to expected standards, are appropriately trained to carry out their role and	Length of employment plus 6 years

		conduct themselves appropriately.	
Fire warden training records	To ensure fire wardens are appropriately trained	Compliance with a legal obligation – Processing is required to comply with HSE requirements	Length of employment plus 6 years
First aid training records	To ensure first aiders are appropriately trained	Compliance with a legal obligation – Processing is required to comply with HSE requirements	Length of employment plus 6 years
Health and safety training records (for all employees and representatives)	To ensure employees are appropriately trained	Compliance with a legal obligation – Processing is required to comply with HSE requirements	Length of employment plus 5 years
Equality Diversity and Inclusion Data (Caring Responsibilities and Education)	For equal opportunities monitoring	Consent – employees can voluntarily provide this information and can delete it at any time.	Length of employment
Log in details / usernames	To provide you access to our systems	Performance of a contract – Usernames and login details are necessary to grant staff access to company systems, resources, and data relevant to their job duties. This ensures information security, protects confidential information and provides accountability and audit trails.	Length of employment
Photographs	To show a thumbnail photo on the organisation chart in the HR system	Consent – employees can voluntarily provide their photograph and can request it to be deleted it at any time.	Length of employment

2. Sensitive Personal Data

The types of sensitive personal data we may hold about our employees includes:

Category of Data	Reason why we process this data (Purpose)	Lawful Basis for Processing (Article 6)	Retention Period
Race/Ethnic Origin	For equal opportunities monitoring	Consent – employees can voluntarily provide this information and can delete it at any time.	Length of employment

Religious Beliefs	For equal opportunities monitoring	Consent – employees can voluntarily provide this information and can delete it at any time.	Length of employment
Sexual Orientation	For equal opportunities monitoring	Consent – employees can voluntarily provide this information and can delete it at any time.	Length of employment
Disability	For equal opportunities monitoring	Consent – employees can voluntarily provide this information and can delete it at any time.	Length of employment
Gender/Gender Identity	For equal opportunities monitoring	Consent – employees can voluntarily provide this information and can delete it at any time.	Length of employment
Health/Sickness Records*	The information is used recording sick leave for statutory sick/maternity pay purposes, fulfilling health and safety obligations, ensuring compliance with equality laws and monitoring and controlling sickness related absence.	<p>Compliance with a legal obligation (statutory sick/maternity pay purposes, fulfilling health and safety obligations, ensuring compliance with equality laws)</p> <p>Legitimate Interests (monitoring and controlling sickness related absence). Knowing the nature of an illness can help determine appropriate return-to-work procedures or offer support for recovery. This can benefit both the employee and the company by facilitating a smoother return to work.</p>	Length of employment plus 6 years
DVLA Driver Record (licence status, unspent penalties, endorsements, revocations, disqualifications, suspension, health-related driving restrictions and entitlement to drive a vehicle).	To confirm employees' entitlement to drive a vehicle for employees eligible for a company car.	Consent – the Driving Licence Verification Service check can only be done where the employee signs a consent form in advance.	Length of employment

Biometric Fingerprint	For secure entry access to office premises	Consent – employees can choose to use the fingerprint access or use an access key card instead.	Length of employment
Criminal Offence Records	Criminal offences disclosed during the job application process and/or annual checks (and which are not exempt from disclosure under the Rehabilitation Offenders Act) and data created in the event of criminal offence allegations being made against an employee may be retained in order to assess and mitigate risk against the company	Senior Managers and Approved Persons: Compliance with a legal obligation – Processing is required to comply with FCA SM&CR regulations. All other employees: Performance of a contract – Criminal offences disclosed during the pre-employment checks and annual checks and data created in the event of criminal offence allegations being made against an employee.	Length of employment
Location Data	Employees are required to sign in and out of the office on a 'Sign In App'. This is required in the event of an emergency to ensure we know which staff are on the premises. Where staff have opted to use the 'Sign in App' on their mobile phone and they have enabled automatic sign in/sign out, location data is captured to automatically sign them in and out of the office.	Consent – it is the employee's choice to download the mobile sign in app as there is the alternative to use the tablet in the office.	Length of employment

***Sensitive health data may be shared with emergency services and/or an emergency contact in the event of a health or mental health emergency where there is risk of serious harm to the employee or to others.**

We will only share necessary and proportionate information with relevant and appropriate emergency services or health professionals that can help mitigate the risk of serious harm to the employee or to others.

We may also share necessary and proportionate information with a worker's next of kin or emergency contact.

(c) Vital interests

Article 9(2)(c) permits you to process special category data if:

“processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent”.

You don't need a DPA Schedule 1 condition to rely on vital interests or an appropriate policy document.

Where do we get personal information from?

We collect your information from the following places:

- From staff members directly
- Employment agency
- Referees (external or internal)
- Pension administrators or government departments (e.g. HMRC and DWP)
- Experian
- Driver and Vehicle Licensing Agency (DVLA) via Driver Check

Who do we share employee data with?

Occasionally we may share your data with the following third parties:

Third-Party	Type of Data Shared	Reason for Sharing
HMRC	Income and/or benefits information	Tax, income and benefits
Mattioli Woods	Full name, email address, date of birth, national insurance number, salary information and pension contribution information	Pension Management
Aviva Pensions	Full name, email address, date of birth, national insurance number, salary information and pension contribution information	Pension Management
Aviva Lifestyle	Email address	Set up access to Aviva Lifestyle benefits
BVRLA	Full name	Set up access to BVRLA Training platform
FABS team	Full name, address and DOB	For sending of flowers/gifts on special occasions or events. FABS obtain consent from employees to obtain this data.
Sign-in App	Full name and email address	Emergency purposes/sign-in and sign-out

We use the following data processors for the following reasons:

Third-Party	Type of Data Shared	Reason for Sharing
Experian/Certn	Full name, email address, proof of identity and proof of address	Background check, adverse financial check, past employment reference check.
Driver Check	Full name, DOB and email address	Driving licence check for company car.
Euro Systems IT	Full name, email address, system log ins	To manage our IT systems.
Bamboo HR	Full name, DOB, work email address	To provide our HR platform.
Limitless	Full name, email address, system log ins	To manage our CRM/Concilium /e-Fleet systems.
Focus	Full name, email address, system log ins	To provide our telephony and call recording services.
SAGE	Name, bank details, NI number, email address, DOB, Sex, Marital Status	For payroll processing.
Text Local	Name, Mobile number	To provide a text messaging service to contact staff during disruption events or emergencies.

Sharing information outside of the UK

Where necessary, our data processor(s) may transfer staff information outside of the UK. When doing so, we comply with the UK GDPR, making sure appropriate safeguards are in place. Please contact the People & Culture team for more information.

Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal data.

Your right to rectification - You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal data in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal data in certain circumstances.

Your right to object to processing - You have the right to object to the processing of your personal data in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances.

Your right to withdraw consent – When we use consent as our lawful basis you have the right to withdraw your consent.

You don't usually need to pay a fee to exercise your rights. If you make a request, we have one calendar month to respond to you.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

How to complain

If you have any concerns about our use of your personal data, speak to your line manager or you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

you suspect misuse of the data held about you by your employer, you should notify your line manager or Compliance Team. If you do not feel comfortable notifying these parties, you should contact the Information Commissioner's Office (ICO) for guidance and/or to report a breach: <https://ico.org.uk/>

Document version control

Version	Author	Date	Changes
0	Siobhan Connelly	15/08/2018	Policy creation
1	Nicola Flynn	12/03/2019	Updated with new FA fonts and made interactive pdf
2	Megan Golightly	28/08/2019	Minor updates.
3	Nicola Richmond	09/09/2019	Typo corrected
4	Lynda Gibson	15/08/2024	Updated data that is processed, added lawful bases, retention periods and data processors.
5	Lynda Gibson	12/12/2024	Changed reference to Roswell IT to Euro Systems
6	Lynda Gibson	07/10/2025	Added EDI data: Caring Responsibilities, Education, Religious Beliefs, Sexual Orientation, Disability, Gender/Gender Identity. Added financial records check.