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# **Employee/Applicant Privacy Policy**

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**March 2026**

## Employee / Applicant Privacy Policy

### 1. Purpose of the Employee / Applicant Privacy Policy

Danny Sullivan Group Limited supplies skilled labourers to construction, engineering and industrial sites and employs office-based personnel to support our operations.

This policy applies to all employees of Danny Sullivan Group Limited (DSG) and its subsidiaries (Danny Sullivan & Sons Ltd, Diamond Construction & Engineering Recruitment Limited, and Danny Sullivan Group Academy Limited), contractors, workers, agency workers, volunteers and any third party with access to our IT systems or data

This Privacy Notice explains how we collect, use, store and share personal data relating to:

- Employee personal data (1100+ workers)
- Applicant data
- Client contractual information
- Payroll and financial data
- Site access credentials
- Commercially sensitive tender information

For the purposes of UK data protection law, Danny Sullivan Group Limited is the Data Controller. We process personal data in accordance with the UK GDPR, the Data Protection Act 2018 and the reforms introduced under the Data (Use and Access) Act 2025 (DUAA), which came into force on 5 February 2026.

If appointed, our Data Protection Officer (DPO) can be contacted at:

- [rezam@dannysullivan.co.uk](mailto:rezam@dannysullivan.co.uk)
- 0208 961 1900

### 2. Data Processors

We use carefully selected third-party service providers (“data processors”) who process personal data on our behalf under written contracts, including:

- Payroll and pension providers
- Recruitment and Applicant Tracking Systems (ATS)
- Time and attendance systems
- IT service providers and cloud hosting providers
- Document storage providers
- Health surveillance providers
- Training and certification bodies
- Background checking providers
- Accountants and legal advisors

All processors are required to implement appropriate technical and organizational security measures.

### 3. How we collect Data

We collect personal data:

Directly from you:

- During recruitment
- When you sign an employment contract
- When you provide compliance documents
- Through timesheets and work records
- During performance reviews
- Through HR processes

From third parties:

- Recruitment agencies
- Previous employers (references)
- Training and accreditation bodies
- Background screening providers
- Occupational health providers
- Client companies where you are assigned
- Public authorities where legally required

Categories of Personal Data we collect

Identification Data

- Full name
- Address
- Date of birth
- National Insurance number
- Passport or right-to-work documentation
- Photograph

Contact Data

- Email address
- Telephone numbers
- Emergency contact details

Employment Data

- CV and qualifications
- Employment history
- Skills certifications
- Training records

- Performance records
- Disciplinary and grievance records

#### Payroll & Financial Data

- Bank details
- Salary and pay rate
- Tax code
- Pension details

#### Compliance & Safety Data

- Health and safety training
- Accident records
- Risk assessments
- Right to work checks

#### Special Category Data (where necessary)

- Health information (fitness to work, medical conditions)
- Occupational health reports
- Trade union membership (if applicable)

#### Technical Data (Office-based Employees)

- IT usage logs
- Email usage
- System access records
- Device information

### 4. How we use Data

We process personal data for legitimate business purposes, including:

#### A. Contractual Necessity

To:

- Pay employees
- Allocate workers to client sites
- Manage employment contracts
- Administer benefits and pensions

#### B. Legal Obligation

To:

- Comply with HMRC requirements
- Conduct right-to-work checks
- Meet health and safety obligations
- Maintain statutory records
- Report workplace incidents

### C. Recognised Legitimate Interests (Under DUAA)

Under Article 6(1) UK GDPR (as amended), we may process data where necessary for “recognized legitimate interests”, including:

- Preventing and detecting fraud
- Safeguarding vulnerable individuals
- Disclosing information to public authorities where required
- Ensuring network and information security

Where we rely on recognized legitimate interests, we document the necessity of processing. You retain the right to object to such processing.

### D. Standard Legitimate Interests

We may process data where necessary for our legitimate interests, including:

- Workforce planning
- Managing client relationships
- Ensuring service quality
- Business administration
- Internal reporting
- IT security monitoring

### E. Consent

We may rely on consent for:

- Certain occupational health assessments
- Use of photographs for marketing purposes
- Optional benefits

You may withdraw consent at any time.

## 5. Automated Decision-Making

We may use automated systems for:

- Payroll processing
- Time tracking
- Workforce allocation
- Compliance alerts

Under the updated GDPR provisions introduced by the DUAA:

- Significant solely automated decisions (without meaningful human involvement) are permitted provided safeguards are in place.
- Where special category data is involved, explicit consent or another lawful basis may be required.

You have the right to:

- Request human review
- Make representations
- Contest decisions

#### 6. How we disclose Data

We may share employee data with:

- Client companies where you are assigned
- Payroll and pension providers
- HMRC and regulatory bodies
- Health and safety authorities
- Occupational health providers
- Legal advisors
  
- IT and cloud service providers
- Law enforcement agencies where required

Where required by recent case law developments, we may disclose specific recipient information in response to subject access requests unless disproportionate or impossible.

### 7. International Data Transfers

Some service providers may store data outside the UK.

Where we transfer personal data internationally, we ensure compliance with UK's updated transfer regime under the DUAA, including:

- Transfers to countries approved under the UK "data protection test"
- Use of appropriate safeguards (such as approved contractual clauses)
- Risk-based assessments where required

### 8. How we store and protect Data

We implement appropriate technical and organizational measures including:

- Encrypted systems
- Secure cloud storage
- Access controls
- Role-based permissions
- Secure document retention systems
- Staff training

Retention periods vary depending on the type of data. Examples:

- Payroll records: 6 years
- Right-to-work documentation: Duration of employment + 2 years
- Accident records: In line with health and safety requirements
- Recruitment records (unsuccessful candidates): 6-12 months

Data is securely deleted or anonymized when no longer required.

## 9. Data Subject Rights

Under UK data protection law, you have the right to:

- Access your personal data
- Rectify inaccurate data
- Erase data (where applicable)
- Restrict processing
- Object to processing
- Data portability
- Not be subject to unlawful automated decisions

### Clarification of Large Requests

Where we hold a large amount of information about you, we may request clarification of your access request under Article 12A UK GDPR. The response time may pause while we await clarification.

### Right to complain (Effective 19 June 2026)

From 19 June 2026, you will have a statutory right to lodge a complaint directly with us. We will:

- Acknowledge your complaint within 30 days
- Provide a response without undue delay

## 10. How to Complain

If you are unhappy with how we process your data, you may contact: [complaints@dannysullivan.co.uk](mailto:complaints@dannysullivan.co.uk)

You also have the right to complain to the UK supervisory authority:  
Information Commissioner's Office

Website: [www.ico.org.uk](http://www.ico.org.uk)

Helpline: 0303 123 1113

## 11. Changes to this Privacy Policy

We may update this Privacy Notice from time to time to reflect:

- Legal changes
- Regulatory guidance
- Business changes

We will notify employees via email or internal communication channels of any significant updates.

## 12. Contact

If you have any questions about this Privacy Notice, or how we handle your personal data, please contact:

- [rezam@dannysullivan.co.uk](mailto:rezam@dannysullivan.co.uk)
- 0208 961 1900
- 22 Barrets Green Road, Park Royal, London, NW10 7AE



Russell Deards  
General Counsel & Company Secretary  
1<sup>st</sup> March 2026