

Data Protection Act 1998

Use of employee information

The following information tells you what Zurich does with the information you give us before, during and following your employment at Zurich, and how we protect your privacy. It also explains your rights under the Act.

Who controls your personal information?

Under the Data Protection Act 1998 we have to tell you who's responsible for deciding how your personal information is used. This is your employing company, who acts as the 'data controller' of your personal information. Details of your employing company can be found in your offer letter or on your monthly payslip.

Personal information in relation to your employment may be used by Human Resources, line management, pensions and the Ill Health Management Group.

Why do we need personal information?

We need relevant information to support any recruitment and employment decisions, and to enable us to fulfil our legal obligations and our duties as a responsible employer. To do this well we need to obtain information in respect of your personal situation – your work and education history, salary, bank account details and so on.

Additional personal information will also be created and used, such as appraisals, training and sickness records and Flexible Benefits.

Sometimes information is very private, for instance details about your physical and mental health or any court proceedings. In line with the Association of British Insurers' (ABI) Code of Practice, the Zurich Group has policies to ensure we keep sensitive personal information securely.

We use a variety of security technologies and procedures to help protect your information from inappropriate use, and we will continue to revise procedures and implement additional security features as new technology becomes available.

How will your privacy be protected?

Zurich is committed to ensuring we protect your privacy. This means we will:

- collect relevant information about you fairly
- tell you why we're collecting it and how we'll be using it
- use it only for our employment purposes and to comply with the law
- ensure that the information we collect and hold about you is accurate
- hold it only for so long as is necessary
- keep it secure
- share it with third parties only where we are required or allowed to do so by law
- not send it abroad without ensuring its security
- ensure you can exercise your rights under the Data Protection Act 1998.

We'll only share information as explained here, or if the law or a regulator say we have to (for example, the Financial Conduct Authority (FCA) or the Office of the Information Commissioner).

How do we use your information?

Examples of how we may use your personal information are:

- to comply with the law e.g. to respond to requests from the Department of Work and Pensions or the Child Support Agency
- to comply with the expectations of our regulators including allowing audits to take place
- to perform data analysis in order to protect the company and/or its customers from potential financial crime activities
- for administration purposes e.g.
 - to enter your details on the HR system to ensure you are paid correctly
 - for premises management e.g. vehicle registration numbers for car parking
 - Health and Safety at work e.g. accident recording and reporting

- to contact you or your nominated contact in the event of an emergency
- to inform third parties e.g. pension scheme trustees and companies who provide Flexible Benefits of your instructions
- to provide information to a trade union with your knowledge and consent when they act on your behalf in employment matters e.g. UFS or Unite
- to identify you when you contact us
- to provide references to third parties on request e.g. potential employers, mortgage lenders, letting agencies
- to ask carefully selected third parties to carry out work on our behalf, e.g. IT support, Global Employee Engagement Survey, creating an employee forum. In such cases, we will ensure that third parties act purely on our instructions and your information will be held securely whether in the UK or abroad
- to pass to other Zurich companies (which could be outside the UK) e.g. in the event of an internal transfer or to support Group initiatives
- to pass to other companies in the event of a company merger, acquisition or restructure
- to protect the integrity of the company, its employees and customers, monitoring may take place under the strict guidelines of the Data Protection Act. This monitoring could include:
 - interception of electronic communications (e.g. emails and attachments or instant messaging) and telephone calls
 - analysis of data in paper and electronic documents , email, Internet or telephony systems.*

Under exceptional circumstances, video or audio recordings, CCTV images, social networking sites and door entry data may be used in investigations.

Within Zurich we use a secure system called 'Employee Self Service' ('ESS'). This system contains all the key personal information held about you, including your monthly payslips. It's your responsibility to keep your personal information up-to-date and you will be prompted periodically through our UK Intranet to do so. Further information on ESS is available at UK Intranet Home > My employment > Access to ESS.

Your health information

We may use details about your health, such as the information you give us on the 'Statement of Health' form and any reports from your doctor/specialist/consultant to decide whether or not we need to make reasonable adjustments under the Equality Act 2010, or to provide support and assistance where required. E.g. rehabilitation/return to work programmes.

The Human Resources function will have access to your 'Statement of Health' form, which may be passed to the Company Medical Adviser, consultants, specialists and 3rd parties appointed by the company as and when appropriate.

What are your data protection rights?

You have certain rights under the Data Protection Act 1998. These include the right to:

- ask for a copy of your personal information – we charge £10 for this. Contact HR Services on 7900 3020 or 0845 3002 933, or by email to GBZ_HR Services
- correct information that is wrong.

Further information

If you have any further questions about how we use your personal information, please contact your line manager in the first instance or HR Services if you need more specific information.

If you have any further questions on the Data Protection Act and your rights under it, please visit our UK Intranet, where you'll find information on data protection and the contact details for the Data Protection team under Essential Information > Managing Our Business Risks > Data Protection.

* For details of the implications of call recording and any personal calls you make or receive on the Zurich telephony system, please refer to UK Intranet > Essential Information > Managing Our Business Risks > Data Protection > Employee Fair Processing Notice Call recording document.