

The Management Centre:
Privacy Notice for Staff and Customers 2022/2023

1. Introduction

The Management Centre is the data controller in relation to your information, as defined in the Data Protection Act 2018 and is committed to protecting your rights, in line with the Data Protection Act 2018 (DPA) and the General Data Protection Regulation (GDPR).

The Management Centre nominated representative for data protection legislation, and the Data Protection Officer is:

Facilities and HR Manager
The Management Centre
College Road
Bangor
Gwynedd LL57 2DG

This statement explains how The Management Centre handles and uses your personal information during your time at the Centre as a member of staff or as a customer. The Management Centre is committed to protecting your personal information and to being transparent about what information it holds. The Management Centre adheres to a range of data protection related policies and procedures in place at Bangor University which can be found here:

<https://www.bangor.ac.uk/governance-and-compliance/dataprotection/index.php.en>

2. Staff: What information do we collect about you?

The Management Centre will collect information about you throughout its dealings with you as a prospective and current member of staff. We will keep a record of the details you provided on your application form (or equivalent), any supporting documents we request as part of the recruitment and selection process, additional details provided by any referees and records following any interview process.

The types of personal information processed include, though is not limited to, the following:

Applicant Data

- All documentation you provide to us a part of the application process.
- References received from your named referees as part of the application process.

- Records of the recruitment and selection process including any records following the interview process. The information you give us will be kept confidential, will be shared strictly in accordance with the requirements of recruitment and selection, and your personal information will not be disclosed to third parties without your prior consent except where necessary to confirm factual information provided by you.
- Personal data of unsuccessful candidates will be deleted after a period of 12 months unless otherwise instructed or required for legislative purposes. If you are successful, the information is retained and transferred to your confidential staff record.

Staff Data

- Your name, address and contact details, any telephone numbers you provide us with, date of birth and gender.
- Details of your qualifications, skills, experience, and employment history, including start and end dates with previous employers and within The Management Centre.
- Salary information, pay progression and awards, pension information.
- Details of your bank account and national insurance number.
- Information about your nationality and entitlement to work in the UK documentation.
- Your emergency contact details if provided by you.
- Any applications for promotion/re-grading which you have submitted or have been submitted on your behalf by your manager together with any references received as part of this process.
- Details of periods of leave taken by you, including holiday*, sickness absence, family leave, and special leave.
- Information gathered for the purposes of equal opportunities monitoring (e.g., ethnic origin, sexual orientation, religious beliefs, disability information). Any reports/returns produced using this type of data will be anonymised.
- Details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence.
- Your PDR record*.
- Your staff development record – details of training you have participated in and contractual development requirements.
- Your confidential occupational health record.
- For certain roles information about past criminal convictions may be processed as detailed under Bangor University DBS Policy.
- Information related to the prevention and detection of crime and the safety and security of staff and students, including, but not limited to, CCTV recording and data relating to breaches of The Management Centre regulations.

* Holiday, and PDR records are maintained at The Management Centre

Some of this data may be categorized as special categories data, as defined by the Data Protection Act 2018.

3. How will your information be used?

It is not possible to state every purpose for which your information will be used by The Management Centre however, in most cases, your personal information is either necessary for the performance of our contractual obligations with you or necessary for compliance with a legal obligation.

e.g. Eligibility to Work in the U.K, Real time Information (RTI), Equality Act 2010 and The Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011.

It may also be required in order that we may fulfil tasks required in the public interest
e.g. HESA reporting (detailed in your contract of employment) and, for certain positions, to carry out criminal record checks - Disclosure & Barring Service checks (DBS).

The following are examples of how information is likely to be used:

- To assess your suitability for a role.
- To undertake pre-employment right to work checks and, for visa nationals, continuation of employment checks.
- To administer payroll, pension and other standard employment functions.
- To ensure effective HR and business administration
- To deliver facilities, services and benefits to you, and where appropriate, to monitor your use in line with University policies e.g., Acceptable Usage of IT Services.
- To communicate effectively with you by post, email and phone.
- To support your development, training, safety and wellbeing requirements.
- To fulfil and monitor our requirements under the Equality Act 2010 and The Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011.
- To obtain Occupational Health advice to ensure we comply with our duties in relation to individual health conditions, meet our obligations under Health & Safety law.
- To ensure you receive pay, or other benefits, to which you are entitled to.
- To ensure we comply with our responsibilities under public safety legislation.
- Where relevant, to monitor, evaluate and support your research and enterprise activity.
- To enable us to contact others in the event of an emergency - If you have provided us with this information we understand that you have done so having obtained the named person's permission before sharing their details with us.
- To compile statistics and conduct surveys and research for internal and statutory reporting purposes (e.g., Higher Education Statistics Agency (HESA)).
- To respond to statutory requires (e.g., Benefits Agency as required by the Social Security Administration Act 1992)
- To share information with Public Health Wales in relation to the notification of notifiable infectious diseases.

4. Who receives your information?

The Management Centre and Bangor University Human Resources Team, Payroll and Pensions, have access to your personal data and are responsible for maintaining your personal file and records on the HR system.

Other colleagues, including your Manager and, where appropriate, line manager and departmental administrators, Finance, Planning and limited Bangor University Digital Services staff will have some access to your records as necessary to perform their duties and business tasks.

Where necessary, personal information will be shared internally between The Management Centre and professional service departments across the University and, in relation to particular processes, such as investigations or appeal panels, other senior University staff/members of Council. Information will not be disclosed to third parties without your consent, or, unless it is permitted by law or contract.

This section outlines the major organisations and the most common circumstances in which The Management Centre discloses information about its staff. Where this involves international transfer, information will only be transferred if it meets the conditions outlined in the Data Protection Act 2018.

- The external providers of staff benefits including USS and BUPAS.
- Bangor University is licensed to sponsor migrant staff under Tier 2 and Tier 5 of the points-based system. The Management Centre and Bangor University will provide data about staff on the Tier 2 and Tier 5 Visas to the Home Office and its departments in order to fulfil its duties under its license.
- Relevant Government Departments including HMRC and UK Visa and Immigration (UKVI)
- Where you have given permission for information to be shared with relevant Trades Unions and external enquirers (e.g., a bank for mortgage reference, letting agencies, your solicitor for recovery of salary in injury claims).
- UK agencies with duties relating to prevention and detection of crime, collection of a tax or duty or safeguarding national security. You should note that there is a statutory duty for higher education institutions to have due regard to the need to prevent individuals from being drawn into terrorism. This may mean that, in particular circumstances, the University will need to pass on personal data to coordinating bodies and partner organisations such as local government and the police. Also courts or Coroners' Offices.
- Auditors, solicitors, insurers and other agents of The Management Centre and Bangor University may require access to personal data from time to time where this becomes necessary.
- These decisions will always be made on a case-by-case basis by the Deputy Secretary/Head of Governance Services, Bangor University.
- On occasion and where necessary, debt recovery and control companies in order to recover debt on behalf of the University, where internal debt recovery procedures have been unsuccessful.
- On occasion, where necessary and where you have given permission, to medical practitioners to obtain Occupational Health advice to ensure we comply with our duties in relation to individual health conditions.
- Public Health Wales in relation to the notification of infectious diseases.
- NHS Wales Test, Trace and Protect Service to support the contact tracing process under Covid-19 regulations, when required.

- Any other disclosures that The Management Centre and Bangor University makes will be in accordance with data protection legislation and your interests and rights will be carefully considered.

Your basic contact details and role appear on our online directory.

Staff working in customer, or 'front-facing' positions may be expected to wear name badges as appropriate and may also have their names displayed on till receipts. Names and photographs may also be displayed on The Management Centre noticeboards.

5. Further information relating to your data

Your rights

You have a right to access your personal information, to object to the processing of your personal information, to rectify, to erase, and restrict your personal information. If you have provided consent to The Management Centre to process any of your data then you also have a right to withdraw that consent. Please visit the Bangor University Data Protection webpages for further information in relation to your rights:

<https://www.bangor.ac.uk/governance-and-compliance/dataprotection/index.php.en>.

Any requests or objections should be made in writing to The Management Centre Data Protection Officer in the first instance.

Security

Data protection legislation requires us to keep your information secure. This means that your confidentiality will be respected, and all appropriate measures will be taken to prevent unauthorised access and disclosure. Only members of staff who need access to relevant parts or all of your information will be authorised to do so. Information about you in electronic form will be subject to password and other security restrictions, and paper files will be stored in secure areas with controlled access.

Retention

The Management Centre retains your information in line with established retention schedules. Further information can be found in the University's retention schedule which can be accessed here:

<https://www.bangor.ac.uk/governance-and-compliance/records-management.php.en>

Complaints

If you are unhappy with the way in which your personal information has been processed you may, in the first instance, contact The Management Centre Data Protection Officer using the contact details above.

If you remain dissatisfied then you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at: -

The Information Commissioner

2nd Floor

Churchill House

Churchill Way

Cardiff CF10 2HH

Tel: 02920 678 400

Your responsibilities

You have a responsibility to keep your personal details up to date. During the course of your employment there are a number of circumstances in which you may have access to personal information about others, either at The Management Centre or elsewhere, such as at a work placement. You are expected to treat this in a responsible and professional manner and are legally required to do this under data protection legislation, as well as any professional ethics, codes of conduct or local rules and regulations. If you are made aware of personal information in confidence you are expected not to disclose this information to anyone without that individual's consent, unless there are exceptional circumstances. You should also not seek to gain others' personal data if you are not entitled to it. Disciplinary action will be considered for any Management Centre member of staff who breaches data protection legislation or a duty of confidence.

6. Customers:

This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we will store and handle that data and keep it safe.

For example, we will explain things such as our credit checking procedure and how we combine data across The Management Centre and its parent company Bangor University to combine information so that we have detailed information on your preferences.

What is The Management Centre?

The Management Centre is a Residential Conference and Business Centre situated in the heart of Bangor University. We are a wholly owned subsidiary and trade as a limited company, but where possible, adhere to the policies and procedures of Bangor University.

- **Bedrooms:** Our 56 bedrooms are graded as 4 star by Visit Wales and we have achieved the Visit Wales Business Class Gold Standard for our meeting and conference rooms.
- **Conferences and Events:** The Management Centre is licensed for civil ceremony weddings and can cater for wedding receptions, gala dinners and a myriad of other events in our licensed 1884 Restaurant, Bar and Hugh Owen Hall.
- **Training:** The Management Centre works closely with our training partners Grŵp Llandrillo Menai and Bangor University to offer a wide range of industry -recognised and professional qualification.

For simplicity throughout this notice, ‘we’ and ‘us’ means The Management Centre and its departments.

Explaining the legal bases, we rely on

Data protection legislation (in this instance both UK law and also the General Data Protection Regulation “GDPR”) sets out a number of different reasons for which a company may collect and process your personal data, including:

- **Consent:** In specific situations, we will need to collect your consent in order to process your data and we do this, for example, by inviting you to tick a box to receive email newsletters. When collecting your personal data, we will always make clear to you which data is necessary for us to hold in order to carry out a particular service.
- **Contractual obligations:** In certain circumstances, we need your personal data to comply with our contractual obligations, and we will make this clear to you.
- **Legal compliance:** If the law requires us to, we may need to collect and process your data. For example, we can pass on details of people involved in fraud or other criminal activity affecting The Management Centre to law enforcement.
- **Legitimate interest:** In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests. For example, passing information to finance for billing.

Information we collect

Where you visit The Management Centre or use our website, we will collect and process the following personal data about you:

- **Information you give us:** This is information that you give us when e.g., completing a web form, booking a bedroom, event, or training course, or by corresponding with us e.g., reporting a problem. The information you give us may include your name, title, age, gender, address, email address, phone number, records of communications sent to you by The Management Centre, or communications received from you, any of your social media usernames if you interact with us through those channels, and financial details. We also hold information regarding any specific assistance you have advised us you may need in the event of an emergency.
- **Information we collect about you:** Every time you use our website we collect certain information about you, including your IP address, location, browser type, and referral source, length of visit, number of page views, full Uniform Resource Locators (URL) and your navigation around our website. This information is collected by the cookies we use. See section 9 below for information on cookies. When on our premises, which have CCTV systems operating for the security of both customers and staff members, please be aware that these systems may record your image during your visit.
- **Information we receive from other sources:** This is information we receive about you if you use any of the other services we provide, for example attending a networking event held in conjunction with one of our business partners. In this case you will have been informed when the data was collected that it would be shared internally and would be combined with any data that we already hold about you collected through the website. We will also have told you for what purpose we will share and combine your data. The Management Centre will not capture or store your personal data in person or via our website without your knowledge and consent.

Information collected on our Website is owned by The Management Centre. We will not sell, share or rent this information to others in ways different from what is stated in this Privacy Notice.

The Management Centre website may contain links to and from the websites of third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies and the way in which they manage their data. Please check these policies before you submit any personal data to these third-party websites.

How we use the personal data we collect

We want to provide you with the best possible customer experience. One way to achieve that is to get the richest picture we can of who you are by combining the data we have about you.

Provided that we have informed you of this, and have your consent, data protection legislation allows us to do this in order to better understand our customers and provide the highest levels of service.

If you wish to change how we use your data, you'll find details in the 'What are my rights?' section below.

If you choose not to share your personal data with us, or refuse certain contact permissions, we might not be able to provide some services you have requested.

We use personal data held about you in the following ways:

- The personal data provided by you on our online web forms, or when you contact us by phone or in person, will be used for the purposes of processing your enquiry. By submitting your enquiry you are consenting to your data being processed by The Management Centre in line with your enquiry, for example your personal data will be shared with our partners if you make an enquiry regarding training.
- We use the anonymised analytical data we gather to analyse trends, administer the Website, track user movements and gather broad demographic information for aggregate use.
- Provided you have consented at the point of us collecting your personal data/submitting the enquiry web form, we may use your personal data to communicate relevant marketing information about The Management Centre and our goods and services by mail, email, SMS, telephone, or targeted advertising on social media and other online platforms such as on Google. This may include information on:
 - information about a course you may be interested in applying for
 - information about a course you have applied for
 - promotion of The Management Centre's services
 - notification of events such as Networking events held in conjunction with our business partners
 - promotion of discounts and seasonal special offers
 - If you no longer wish to receive marketing information, please email info@themanagementcentre.co.uk. You will also be given the opportunity to opt out of receiving marketing information on each piece of marketing information we send to you.
- The technical information we collect using cookies will be used for the purposes set out in Section 9 of this policy.
- The information we receive from other sources may be combined with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).
- To send you survey and feedback requests to help improve our services. These messages will not include any promotional content and you can opt out at any time.
- The Management Centre shall not sell or otherwise transfer your personal data to any third parties except as set out in this privacy policy which may include the following circumstances:

- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of The Management Centre, our staff, or others. This includes exchanging information with third parties for the purposes of fraud protection and credit risk reduction.

How we store your personal data and how long do we keep it for?

Once we have received your information, we will use appropriate organisational and security measures to prevent unauthorised access to your personal data.

Your personal data is stored by The Management Centre in accordance with Bangor University's Record Retention Schedule and the Immigration (Hotel Records) Order 1972.

What are your rights regarding your personal data?

The Management Centre aims to keep your personal data up to date and welcomes any updates to your details or corrections to any inaccuracies you choose to provide. Please help us keep our records updated by informing us of any changes to your email address and other contact details.

You have the right to request:

- Access to the personal data we hold about you.
- The correction of your personal data when incorrect, out of date or incomplete.
- That we stop using your personal data for direct marketing (either through specific channels, or all channels).
- That we stop any consent-based processing of your personal data after you withdraw that consent.

You can contact us to request to exercise these rights at any time as follows:

To ask for a copy of your information: please write to Facilities and HR Manager, The Management Centre, College Road, Bangor, Gwynedd, LL57 2DG

To ask for your information to be amended: please email info@themanagementcentre.co.uk

Your right to withdraw consent

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

Where we rely on our legitimate interest

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation.

We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

Direct marketing

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request.

There are several ways you can stop direct marketing communications from us:

- Click the ‘unsubscribe’ link in any email communication that we send you. We will then stop any further emails.
- Write to: Events and Marketing Officer, The Management Centre, College Road, Bangor, Gwynedd, LL57 2DG
- Email: info@themanagementcentre.co.uk

Checking your identity

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice.

If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

Automated Decision Making

No automated decision-making processes are utilised with The Management Centre or any of its departments.

Cookies

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. By using our website(s) you are agreeing that we can place cookies on your device. Currently our cookies include your language preferences and information on the pages within our website which you visit. However, all usage data is aggregated and does not show the activities of any given individual or computer. We only use cookies to enable us to provide the best online service for you. Our analytics data includes information about your computer and includes your IP address, browser type, domain name, access times and referring website addresses. This information is used by The Management Centre for the operation of the service, to maintain quality of service and to provide general statistics regarding use of The Management Centre website.

Passwords

Where you have been provided with (or where you have chosen) a password which allows you to access certain parts of the website, you are responsible for keeping the password safe and confidential. You must not share a password with anyone.

The complaints process

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you should contact us in the first instance: please write to Facilities & HR Manager, The Management Centre, College Road, Bangor, Gwynedd, LL57 2DG

You also have the right to lodge a complaint with the Information Commissioner's Office. You can contact them by calling 0303 123 1113. Or go online to www.ico.org.uk/concerns (opens in a new window; please note we can't be responsible for the content of external websites)

*Reviewed by The Management Centre Executive Team
August 2022*