

# **DABBERS PRIVACY NOTICE STAFF**

## **BACKGROUND:**

Kinzo Limited understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our customers and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

### **1. Information About Us**

Kinzo Limited is a company registered in England and Wales under number 12745507, and whose registered office is at 146 New London Road, Chelmsford, CM2 0AW. We trade as “Dabbers Social Bingo”.

Data Protection Officer: Alastair Oatey

### **2. What Does This Notice Cover?**

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

### **3. What Is Personal Data?**

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in the Appendix, below.

### **4. What Are My Rights?**

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 10.
- b) The right to access the personal data we hold about you. Part 9 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 10 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 10 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal

basis for using your personal data, you are free to withdraw that consent at any time.

- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) We do not use automated decision-making or profiling.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 10.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 10.

## 5. **What Personal Data do you store?**

The table in the Appendix shows the personal data that we generally hold for staff. The information is either provided by you (eg when applying for work), through a third party introduced by you (eg for a reference) or by us in the normal course of business (eg performance management information).

The table also details where the information is stored and how long we keep it for.

## 6. **How Do You Use My Personal Data?**

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The basis for using your data is to enter into a contract of employment with you.

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, or telephone with information, news, and offers on our products and services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 11.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

## 7. **How and Where Do You Store or Transfer My Personal Data?**

We will only store your personal data in the UK. This means that it will be fully protected under the

Data Protection Legislation.

#### 8. **Do You Share My Personal Data?**

We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

We may share your personal data with other companies in our group. This includes subsidiaries and/or a holding company and its subsidiaries.

We may sometimes contract with the following third parties to supply products and/or services.

- Performance Pay (Payroll)
- Troncmasters Ltd (Independent Tronc Master)

If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 6.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

#### 9. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request not more than one month after receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

#### 10. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Alastair Oatey):

Email address: [dab@dabbers.bingo](mailto:dab@dabbers.bingo).

Telephone number: 020 3176 3139.

Postal Address: Dabbers Social Bingo, 18-22 Houndsditch, London, EC3A 7DB.

**11. Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available on our website. This Privacy Notice was last updated on 1<sup>st</sup> March 2024.

## Appendix: Data held

### Staff

Legal basis: Entering into a contract of employment; legal obligation (eg right to work)

Review period: yearly

Purpose of data	Data held	Location held	Retention period
Recruiting you	Personal data includes any information you provide to apply to work with us.	If paper, on file in the venue. If electronic, in google drive or dropbox	6 months if you are unsuccessful, otherwise 6 years from the end of your employment.
Supporting your engagement and your performance in your role	Personal data includes: <ul style="list-style-type: none"> <li>i. personal details, including name, contact details (phone, email, postal, both work and personal) and photograph;</li> <li>ii. your current and any previous role descriptions;</li> <li>iii. your current and any previous contracts of employment and related correspondence;</li> <li>iv. your training and development qualifications, requests and requirements.</li> <li>v. your CV and training records</li> </ul> Special category data includes: <ul style="list-style-type: none"> <li>i. any occupational health assessments and medical information you have provided, and related work requirements;</li> </ul>	If paper, on file in the venue. If electronic, in google drive or dropbox	6 years from the end of your employment, following which we will only keep a record of your name and the dates of employment so that we can provide employment references if requested.
Ensuring that you have the right to work	Personal data includes: <ul style="list-style-type: none"> <li>i. your recruitment information (including your original application and associated information submitted at that time);</li> <li>ii. other data relating to your recruitment (including your offer of employment and related correspondence, references we took up on your appointment, and any pre-employment assessment of you);</li> </ul> Special category data includes: <ul style="list-style-type: none"> <li>i. evidence of your right to work in the UK (e.g. copy of your passport).</li> </ul>	If paper, on file in the venue. If electronic, in google drive or dropbox	6 years from the end of your employment
Paying and rewarding you for your work	Personal data includes: <ul style="list-style-type: none"> <li>i. your bank details;</li> <li>ii. details of your pension scheme;</li> <li>iii. your current and previous salary and other earnings (e.g. maternity pay, overtime), and the amounts you have paid in</li> </ul>	If paper, on file in the venue.  If electronic, in google drive or dropbox.  Electronically at the	Payroll records are kept for three years from the end of the tax year that they relate to.

Purpose of data	Data held	Location held	Retention period
	<ul style="list-style-type: none"> <li>iv. statutory taxes correspondence relating to your pay, pension and any other remuneration.</li> </ul>	<p>payroll provider.</p> <p>Electronically at the Tronc Master</p>	
Administering HR-related processes	<p>Personal data includes:</p> <ul style="list-style-type: none"> <li>i. records of your induction training;</li> <li>ii. records of your performance appraisals;</li> <li>iii. records, where they exist, of any investigation or review into your conduct or performance;</li> <li>iv. records of absences from work (including but not limited to annual leave entitlement, sickness leave, parental leave and compassionate leave)</li> <li>v. correspondence regarding any matters relating to your employment and any related issues (including but not limited to changes to duties, responsibilities and benefits, your retirement, resignation or exit from the Company and personal and professional references provided by the Company to you or a third party at your request).</li> </ul>	<p>If paper, on file in the venue.</p> <p>If electronic, in google drive or dropbox</p>	6 years from the end of your employment
Maintaining an emergency contact point for you	Personal data includes details of your preferred emergency contact, including their name, relationship to you and their contact details.	<p>If paper, on file in the venue.</p> <p>If electronic, in google drive or dropbox</p>	Retained until you leave
Monitoring equality and diversity	<p>Personal data includes information relating to your age and gender.</p> <p>Special category data includes information relating to your nationality and ethnicity.</p>	<p>If paper, on file in the venue.</p> <p>If electronic, in google drive or dropbox</p>	6 years from the end of your employment
Accident records	Name, contact details	On hard copy in the venue and electronically on Google Drive	Data may be deleted or anonymised from three years after the incident

The data we hold may be used to disclose personal information about you to external organisations, as permitted or required by law.