



Privacy Notice

Sanctuary Tribe Ltd

This privacy notice explains what you can expect us to do with your personal information.

Contact Details

If you have any questions about this privacy notice or how we handle your personal information, please get in touch:

Email: lauren-faye@sanctuary-tribe.com

What Information We Collect, Use, and Why

We collect and use personal information for a number of different purposes, set out below.

To Comply with Legal Requirements

We collect or use the following personal information to comply with legal requirements:

- Name
- Contact information
- Identification documents

For Recruitment Purposes

We collect or use the following personal information for recruitment purposes:

- Contact details (e.g. name, address, telephone number or personal email address)
- Copies of passports or other photo ID
- Employment history (e.g. job applications, employment references or secondary employment)
- Education history (e.g. qualifications)
- Right to work information

For Dealing with Queries, Complaints or Claims

We collect or use the following personal information for dealing with queries, complaints or claims:

- Names and contact details
- Addresses
- Witness statements and contact details
- Relevant information from previous investigations
- Information relating to health and safety (including incident investigation details, reports and accident book records)
- Correspondence

For Employment Administration, Performance Management and Employee Relations

We collect or use the following personal information for new starter administration, performance management and employee relations purposes:



- Names and contact details
- Gender
- Pronoun preferences
- Occupation
- Date of birth
- Third-party information (such as family members or other relevant parties)
- Payment details (including card or bank information for transfers and direct debits)
- Employment details (including salary, sick pay and length of service)
- Health and wellbeing information (such as medical records or health conditions)
- Records of meetings and decisions

Lawful Bases and Your Data Protection Rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. The UK GDPR sets out a list of possible lawful bases, and you can read more about these on the [ICO's website](#).

The lawful basis we rely on for each purpose can affect which of your data protection rights apply. Your rights are summarised below; you can read more about them, and any exemptions that may apply, on the ICO's website.

- **Right of access** – You can ask us for copies of your personal information, along with details of where we obtained it and who we share it with. Some exemptions may apply.
- **Right to rectification** – You can ask us to correct or delete personal information you believe is inaccurate or incomplete.
- **Right to erasure** – You can ask us to delete your personal information.
- **Right to restriction of processing** – You can ask us to limit how we use your personal information.
- **Right to object to processing** – You can object to us processing your personal data.
- **Right to data portability** – You can ask us to transfer your personal information to another organisation, or to you.
- **Right to withdraw consent** – Where we rely on consent as our lawful basis, you can withdraw that consent at any time.

If you make a request, we will respond without undue delay and, in any event, within one month. To exercise any of these rights, please contact us using the details above.

Our Lawful Bases for Collecting and Using Your Data

Complying with Legal Requirements

- **Contract** – We need to collect or use this information to enter into or carry out a contract with you. All data protection rights may apply, except the right to object.

Recruitment Purposes

- **Contract** – We need to collect or use this information to enter into or carry out a contract with you. All data protection rights may apply, except the right to object.



- **Legal obligation** – We need to collect or use this information to comply with the law. All data protection rights may apply, except the rights to erasure, to object and to data portability.
- **Legitimate interests** – We collect or use this information because it benefits you, our organisation or someone else, without causing an undue risk of harm. All data protection rights may apply, except the right to portability. Our legitimate interest is that previous work experience and education information helps us assess a candidate's application and confirm we are making a suitable hire with the right experience and skills.

For more information about our use of legitimate interests as a lawful basis, please contact us using the details above.

Dealing with Queries, Complaints or Claims

- **Consent** – We rely on the permission you've given us after providing you with all the relevant information. All data protection rights may apply, except the right to object. You can withdraw your consent at any time.

Employment Administration, Performance Management and Employee Relations

- **Consent** – We rely on the permission you've given us after providing you with all the relevant information. All data protection rights may apply, except the right to object. You can withdraw your consent at any time.
- **Contract** – We need to collect or use this information to enter into or carry out a contract with you. All data protection rights may apply, except the right to object.

Where We Get Personal Information From

We collect personal information from the following sources:

- Directly from you
- Previous employment
- From the employer

How Long We Keep Information

We keep personal information only for as long as necessary for the purposes described in this notice, and in line with our legal obligations. Our retention periods are set out below.

Data Type	Retention Period	Trigger Point	Legal Basis for Period
Employee contracts & personal details	6 years	Date employment ends	Limitation Act 1980 (contractual claims)
Bank details & payroll records	6 years	Date employment ends	HMRC statutory requirement
ER documents (disciplinarys, grievances)	6 years	Date employment ends	Potential Employment Tribunal claims
Performance documents	6 years	Date employment ends	Potential legal claims
Sickness & absence records	6 years	Date employment ends	Disability discrimination risk



Special category / health data	6 years	Date employment ends	Employment law and ICO guidance
CVs — successful hire	6 years	Date employment ends	Part of employment record
CVs — unsuccessful candidates	12 months	Date of decision	ICO guidance; discrimination risk
Interview notes	12 months	Date of decision	ICO guidance; discrimination risk
Right to work documents	2 years	Date employment ends	UK Visas & Immigration requirement
Sanctuary Tribe staff contracts	6 years	Date employment / contract ends	Limitation Act 1980
Client engagement records	6 years	Date engagement ends	Contractual / legal claims

Who We Share Information With

We may share personal information with:

- Professional or legal advisors

How to Complain

If you have any concerns about how we use your personal information, please contact us in the first instance:

Email: lauren-faye@sanctuary-tribe.com

If you remain unhappy after raising a complaint with us, you also have the right to complain to the Information Commissioner's Office (ICO):

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline: 0303 123 1113

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