



Security, Confidentiality & Data Protection

Data Protection

We will comply with all data protection laws in respect of both manual and computerised records and ensure that personal information is kept secure and disclosed only to those who need to know.

We will process your personal data in accordance with our data Privacy Notice and will ensure that your personal data is processed lawfully because the processing is necessary for the performance of the contract of employment between you and us.

Data Subject Access Requests (SAR)

If you wish to make a SAR, you should do so using a SAR Form which is available from the Head of People and should be completed and returned to them to progress the request. We will usually respond to SARs received within one month of receipt. However, this may be extended by up to two months if the SAR is complex and / or if numerous requests have been made. All SARs will be dealt with by the Head of People.

We do not charge a fee for handling normal SARs. However, we may charge reasonable fees for additional copies of information that have already been supplied to you and for requests which are found to be manifestly unfounded or excessive, particularly where requests are repetitive.

Data Privacy Notice

The purpose of this privacy notice is to make you aware of how and why we will collect and use your personal information both during and after your working relationship with the Company.

The Company is committed to being transparent about how it handles your personal information, to protecting the privacy and security of your personal information, and to meeting its data protection obligations under the General Data Protection Regulation (“GDPR”) and the Data Protection Act 2018.

This privacy notice applies to all current and former employees, workers and consultants of Heron and Brearley Group businesses which means: Heron and Brearley Limited, Okell’s Inns Limited, Mannin Retail Limited, Trade Distribution Limited, and Heron and Brearley Wholesale Limited, and all associated subsidiary businesses. It is non-contractual and does not form part of any employment contract, casual worker agreement, consultancy agreement or any other contract for services.

What Information We Collect



We will collect personal data, or personal information, which means any information about you from which you can be identified. It does not include data where your identity has been removed (anonymous data). Examples of the types of personal data we will collect include:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses
- Date of birth
- Gender
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process)
- Employment records (including job titles, work history, working hours, training records and professional memberships)
- Marital status and dependants
- Next of kin and emergency contact information
- National Insurance / Social Security / Insurance number
- Bank account details, payroll records and tax status information
- Salary, annual leave, pension and benefits information
- Start and (where applicable) end date of employment
- Location of employment or workplace
- Copy of passport and/or driving licence
- Remuneration history
- Performance information
- Disciplinary and grievance information
- Photographs, CCTV footage and other information obtained through electronic means such as a swipe card record
- Information about your use of our information and communications systems

We may also collect, store and use the following “special categories” of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions
- Trade union membership
- Information about your health, including any medical condition, health and sickness records
- Genetic information and biometric data
- Information about criminal convictions and offences

How We Use Your Data

We process your personal data for purposes including:

- Recruitment and onboarding
- Paying salary and benefits
- Performance and absence management
- Legal compliance (e.g., IoM Treasury/HMRC reporting)
- Health and safety
- IT administration and security
- Equal opportunities monitoring
- Internal communications (e.g legitimate business updates)
- Communications in relation to your employment
- Where it is necessary for its legitimate interests (or those of a third party), and your interests or your fundamental rights and freedoms do not override the Company's interests
- The Company may also occasionally use your personal information where we need to protect your vital interests (or someone else's vital interests)

Sharing Your Data

We may share your personal data with:

- Payroll providers
- Pension and benefits providers
- HMRC and other government bodies
- Occupational health providers
- IT service providers
- Legal or professional advisers (where necessary)

We ensure all third parties respect your data privacy and comply with UK/Isle of Man data protection laws.

Data Retention

We retain your personal data only as long as necessary for the purposes it was collected. This typically means:

- 6 years after the end of employment (for legal reasons)
- Some health and safety records may be kept longer

Your Rights

You have rights regarding your personal data, including:

- Access to your data
- Correction of inaccurate data
- Erasure (in certain circumstances)



- Restriction or objection to processing
- Data portability
- Right to lodge a complaint with the Information Commissioner

If you wish to exercise your rights or have any questions, please reach out to the HR team.