EMPLOYEE PRIVACY NOTICE

Last updated 03 March 2026

1. Our Commitment to Protecting Employee Data

Dakota Hospitality Limited ("the Company") is committed to protecting your personal information and complying with all applicable data protection laws, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

2. What Is Personal Data?

Under UK GDPR, personal data means any information relating to an identified or identifiable individual. This includes things like your name, personnel ID, contact details, location data, or any other information that can be linked to you directly or indirectly.

3. Why We Use Your Personal Data

We may use your personal data for the following reasons:

- Contract – to fulfil our employment contract with you
- Legal obligation – to meet legal requirements
- Vital interests – to protect someone's life in an emergency
- Public task – to carry out official functions or tasks in the public interest
- Legitimate interests – to support our business operations, provided this does not override your rights

4. Sharing Your Personal Data

We will only share your personal data when necessary and in line with the lawful bases outlined above as outlined in Appendix One – Employment Data Retention Periods and Appendix Two – Health and Safety Retention Periods. These tables also explain the reasons for processing and the applicable retention periods.

In addition to the tables in Appendix One and Appendix Two, the Company may share your personal data with external legal advisors when required for legal advice or to manage legal claims. These advisors, along with authorities or regulators where disclosure is required by law or court order, may not be listed in the appendices due to the situational nature of such sharing.

It is understood that personal data may be processed through Microsoft 365 applications, including but not limited to Outlook email and SharePoint, as part of the Company's standard business operations. The Company has appointed Astro Communications Ltd to act as an extension of its IT department and uses Darktrace Holdings Ltd as its cybersecurity. In addition, some employees may use the Company's licensed Claude AI tool on their devices to support workflow efficiency; while this tool may process data as part of those tasks, it does not use personal data for model training, and it is not used to make any automated decisions regarding your employment.

In addition to the purposes outlined in Appendix One, the Company may share your personal data with relevant government bodies to process payroll and meet our statutory employer obligations. Such disclosures will only occur where there is a legal obligation or a lawful basis under data protection legislation. In certain circumstances, we may also share your personal data with HM Revenue & Customs (HMRC), other government departments and regulatory authorities, law enforcement agencies such as the police, and courts or tribunals, where required by law or in response to lawful requests.

5. Your Rights

You have the right to:

- Request a copy of the personal data we hold about you
- Ask us to correct inaccurate or incomplete data
- Withdraw your consent (where processing is based on consent)

Please refer to the Company's Data Protection Policy for how to make these requests.

6. Questions or Concerns

If you have any questions about how your data is used, please contact: gdpr@dakotahotels.co.uk . If you're not satisfied with our response, you can raise a complaint with the UK's data protection regulator, the Information Commissioner's Office (ICO) on https://ico.org.uk/make-a-complaint/

APPENDIX ONE – Employment Data Retention Periods

Type of Personal Data	Who It Is Shared With Externally	Who It Is Shared With Internally	Reason for Sharing This Information	Retention Period for the Company keeping this information
Personal details including full name and address, emergency contact information, bank information, national insurance number, pay information, email address, statutory leave information, phone number, date of birth.	Finance software: Sage Intacct, Sona, Sage Pay, Natwest Bank, and SAP Concur, Stream. Pension provider: Aegon or NEST.	HR, Payroll	Contract requirement and Legal obligation: to process payroll and pension payments. To ensure that we provide all statutory information in order to provide evidence that we are complying with our legal obligations.	Six years after the termination of employment, unless there is a legal requirement to extend.
Personal details including full name and address, emergency contact information, email address, phone number, date of birth, driving licence and record, information of any absences, medical conditions and disabilities, CCTV footage (no audio), outcome of a DBS check.	Aon UK Limited as the broker, and the appointed insurer. At the time of writing, Aviva Insurance and Canada Life. BUPA (only if employee is provided with cover).		Contract requirement and Legal obligation: to administer insurance coverage and benefits, assess eligibility, manage claims, and ensure statutory reporting where required.	
Personal details including full name, email address, phone number, information of any absences, accidents or near misses, medical conditions and disabilities, CCTV footage (no audio).	Food Alert, Health & Safety Consultants	HR, H&S, Relevant Manage-ment on a need to now basis	Legal obligation and Legitimate interests: to support health & safety compliance, investigate accidents or near misses, monitor site security, and ensure we meet our statutory duties for workplace safety.	
	AvloHR Ltd, HR consultants		Legitimate interests and Legal obligation: to support HR case management, ensure fair and compliant handling of employee matters, and meet our statutory	

			duties relating to employee wellbeing, safety, and workplace conduct.	
Entirely of the employment file. Personal details including full name and address, photo, passport, birth certificate, any right to work information, email address, phone number, date of birth, qualifications, employment history, equal opportunities monitoring details, driving licence record, information of any absences, medical conditions and disabilities, outcome of DBS check.	Software: Sona, Filestream, TrustID, Adobe Acrobat, Recruit Genie.	HR, H&S, Payroll / Finance	Contract requirement and Legal obligation: to maintain complete employment records, verify identity and right to work, manage HR processes, store official documents, and ensure we meet all statutory duties relating to employment and workforce administration.	Six years after the termination of employment, unless there is a legal requirement to extend.
Personal details including full name and address, email address, phone number, contents of the CV.	Recruitment software: Recruit Genie, A2H.	HR	Legitimate interest: Required to process application for recruitment.	Up to three years after application is made.
Full name, email address, mobile number.	External training providers: Expert LMS, MapalOne, Cardinus, Virtual College, Staff Skills Training, iHASCO, Xtra Mile.	HR	Legitimate interest: to create an account. Note: In some cases, national Insurance number and date of birth may also be shared for a funding check ahead of an apprenticeship but this will be communicated in advance.	No longer than six months after employment end.
Full name, email address.	YuLife, Seven Rooms booking diary, Shiji property manage-ment system, Planet/Freedom/ Global Pay, SK Chase, iAuditor.		Legitimate interest: to create an account required for your role.	

[*Only concerning individuals in roles who receive tronc payments]* Personal details: full name, email address Employment status: Payroll number, Location of work, Hours of work, Start and end date of employment, job title/role, and department.	Tronc master – Grateful Ltd	HR, Payroll/ Finance	Contract requirement and Legitimate interests: to administer tronc payments accurately, verify eligibility, and ensure correct calculation and distribution of tronc in line with role-specific entitlements.	Six years after the termination of employment
Visual footage of employees captured on CCTV (no audio)	Law enforcement agencies (only if required for investigation or legal obligation)	HR, Security, Manage-ment (on a need-to-know basis), H&S.	Legal obligation and Vital interests: to support criminal investigations, comply with law-enforcement requirements, and protect the safety and security of employees, guests, and company property.	CCTV storage automatically up to 90 days. If downloaded for storage, reverts to retention period of the storage platform.

APPENDIX TWO – Health and Safety Retention Periods

Regulation	Record Type	For the duration of employment plus the below retention period
Control of Major Accident Hazard Regulations	All assessments, evaluation reports, practice drills etc	20 years'
Fire Safety Regulations	All assessments, maintenance records, training etc	5 years'
Reporting of Injuries, Disease and Dangerous Occurrences Regulations (RIDDOR)	Normal physical accidents Health related illness	3 years' 40 years'
Display Screen Equipment (DSE) Assessments	All assessments	3 years'
Control Of Substances Hazardous to Health Regulations (COSHH)	Anything pertaining to Health Surveillance of Employees (including COSHH Assessments, local Exhaust Ventilation Thorough Examinations & Occupational Health reports) Records documenting cytotoxic substances and agents, as defined in the Control of Substances Hazardous to Health Regulations (COSHH, present/use)	40 years' 40 years'

Dangerous Substances and Explosive Atmospheres (DSEAR)	Records documenting the conduct and significant findings of DSEAR assessments Records documenting statutory thorough examination, testing and repair of plant and equipment provided to mitigate explosive atmospheres e.g. local exhaust ventilation systems	40 years' 5 years'
Personal Protective Equipment Regulations	Records documenting the conduct and results of face fit testing of RPE	40 years'
Control of Asbestos Regulations	Anything pertaining to Health Surveillance of Employees (including asbestos surveys, air monitoring and Occupational Health Reports	40 years'
Control of Lead Regulations	Anything pertaining to Health Surveillance of Employees (Occupational Health Reports) Air Monitoring	40 years' 5 years'
Control of Noise at Work	Anything pertaining to Health Surveillance of Employees (Occupational Health Reports, risk assessments)	40 years'
Control of Vibration at Work	Anything pertaining to Health Surveillance of Employees (Occupational Health Reports, risk Assessments)	40 years'
The Work in Compressed Air Regulations	Anything pertaining to Health Surveillance of Employees (Occupational Health Reports)	40 years'
Ionising Radiation Regulations	Anything pertaining to Health Surveillance of Employees (Occupational Health Reports)	40 years'
Construction & Design Management Regulations	Scaffold inspections, Temporary works inspections and Excavation work inspections Design Documentation	Kept on site for the length of the project and for three months after the project is completed Retained for the life of the building or construction
Provision & Use of Work Equipment Regulations	Reports and documented inspections on power presses	3 years'
Lifting Operations & Lifting Equipment Regulations	Thorough Examination Report on Lifting Equipment & Lifting Accessories	5 years' Until the Lifting equipment ceases to be used (EC declaration of conformity)
Pressure Systems Safety Regulations	Inspection, examinations, servicing of pressure systems	3 years' Until the pressure system ceases to be used (Written Scheme of Examination)