

# Abu Dhabi Al Islami UK Employee Privacy Notice



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Abu Dhabi Al Islami UK gathers and processes your personal information in accordance with this Privacy Notice and in compliance with the GDPR and UK data Protection law. 'Personal information' refers to information about a living individual who can be identified from that information (either by itself or when it is combined with other information).

The purpose of this Privacy Notice is to provide you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

We reserve the right to change this Privacy Notice. Any updates to this Privacy Notice will be communicated to you and published on the share drive.

## 1. Who we are

- 1.1 This privacy notice ('Privacy Notice') applies to all personal information processing activities carried out by Abu Dhabi Al Islami UK ('the company' or 'we' or 'us' or 'our').
- 1.2 Abu Dhabi Al Islami UK is registered in England and Wales under company number [REDACTED].
- 1.3 Abu Dhabi Al Islami UK is registered on the Information Commissioner's Office Register under registration number [REDACTED].
- 1.4 Abu Dhabi Al Islami UK is a data controller in respect of personal information that we process in connection with our business (including the products and services that we provide).
- 1.5 Our registered office and main place of business is One Hyde Park, 100 Knightsbridge, London SW1X 7LJ.
- 1.6 Abu Dhabi Al Islami UK is a branch of the Abu Dhabi Islamic Bank PJSC (UAE).

## 2. Personal information we process

- 2.1 We collect and process various categories of personal information at the commencement of, and for the duration of, your employment with us. We will only collect and process personal information which is necessary to achieve one or more legitimate purposes as identified in Annex A of this Privacy Notice.
- 2.2 You are not obligated to provide your personal information to Abu Dhabi Al Islami UK, however, as this information is required for legal and regulatory employment obligations the company has, we will not be able to offer and/or continue your employment without it.
- 2.3 Personal information we collect and process may include:
  - a. Basic personal information, and where necessary proof of, your name, maiden name, mother's maiden name, gender, current and previous address (covering a 5 year period), place and date of birth, contact details, passport number, nationality and driving license number;
  - b. Information about your family and lifestyle/social circumstances such as your marital status and your dependents;

- c. Information, and where necessary proof of, about your education and employment, including details of previous salary and package, P45 from previous employer and reference contact details (covering a 5 year period);
  - d. Financial information, including your tax identification number and bank account details;
  - e. Sickness records, Medical Certificates/Maternity form MATB1;
  - f. Next of kin/emergency contact including their name, contact number and address;
  - g. Beneficiaries for life assurance policy including their name, address, relationship; and
  - h. Visual images and personal appearance including copies of passports and other photographic identification documents and CCTV images.
- 2.4 We will only process special categories of information for specific and limited purposes, such as detecting and preventing financial crime, where we are lawfully permitted to do so, and in accordance with Annex A.
- 2.5 Special categories of information which we may process may include information about your:
- a. racial or ethnic origin,
  - b. religious or philosophical beliefs; and
  - c. biometric information, relating to the physical, physiological or behavioural characteristics of a person, including, for example, using voice recognition or similar technologies to help us prevent fraud and money laundering.
- 2.6 Where lawfully permitted, we may process information about criminal convictions or offences and alleged offences for limited and specific activities and purposes including conducting investigations to detect and prevent criminal activities and to comply with laws relating to money laundering, terrorist financing, international sanctions, fraud and bribery and corruption. Our investigations may involve gathering intelligence on suspected financial crimes, fraud and threats and sharing data with regulatory and law enforcement bodies.
- 2.7 In the event that we change the way we process your personal information, and where we reasonably believe that you would not reasonable foresee/expect such a change, we will provide you with 30 days advance written notice.

### 3. How we collect/obtain personal information

- 3.1 Your personal information is made up of all the personal and financial information we collect and hold about you.
- 3.2 We may collect obtain personal information as follows:
- a. Information provided by you when you join the company and throughout your employment with us;
  - b. Information that we collate from publicly available sources, company registers, media, online search engines and electoral registers; and
  - c. Information that we receive from third parties – such as the ADIB Group and third parties who provide services to you or us, credit reference, crime and fraud prevention (for e.g. CIFAs and World Check) and other government agencies.

## 4. Your rights

- 4.1 We have set out your rights in relation to the personal information we process about you in the table below to ensure that you are fully aware of your rights and the circumstances in which they apply.
- 4.2 If you wish to exercise any of these rights, have queries about how we use your personal information or if you wish to make a complaint, please contact us at [REDACTED].
- 4.3 If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

RIGHTS	DETAILS
<b>Access</b>	<ul style="list-style-type: none"> <li>▪ The right to access personal information we hold about you</li> <li>▪ For details on how to submit a request, please refer to our 'Making a Subject Access Request' document on our website</li> </ul>
<b>Portability</b>	<ul style="list-style-type: none"> <li>▪ The right to request personal information, which you provided to us, in a portable format and to request that we send it directly to a third party, if technically feasible.</li> </ul>
<b>Restriction</b>	<ul style="list-style-type: none"> <li>▪ The right to request us to restrict the processing of your personal information if you believe that any of the information that we hold about you is inaccurate or we no longer need to process your information for the purposes for which it was provided, but you require the information to establish, exercise or defend legal claims or we are not using your information in a lawful manners.</li> </ul>
<b>Rectification</b>	<ul style="list-style-type: none"> <li>▪ The right to request that we restrict processing and rectify inaccurate and/or incomplete personal information</li> </ul>
<b>Erasure</b>	<ul style="list-style-type: none"> <li>▪ The right to request that we erase your personal information if you believe that we no longer need to process your information for the purposes for which it was provided or we have requested your permission to process your personal information and you wish to withdraw your consent or we are not using your information in a lawful manner.</li> </ul>
<b>Objection</b>	<ul style="list-style-type: none"> <li>▪ The right to object to processing of your personal information for the purposes described in Annex A.3, unless we can demonstrate compelling and legitimate grounds for processing.</li> </ul>
<b>Withdraw consent</b>	<ul style="list-style-type: none"> <li>▪ Where we rely on your consent to process your personal information, you have a right to withdraw your consent at any time without suffering any detriment.</li> </ul>
<b>Complain</b>	<ul style="list-style-type: none"> <li>▪ The right to make a complaint about how we have processed your personal information</li> <li>▪ Complaints should be submitted to the company at: [REDACTED], and we will aim to promptly investigate and resolve the matter.</li> <li>▪ You also have the right to lodge a complaint directly with the Supervisory Authority by post at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow SK9 5AF or by phone on 0303 123 1113.</li> </ul>

## 5. Sharing with third parties

- 5.1 We will limit the amount and nature of information we share, with whom we share it and when we share it to that which is strictly necessary.
- 5.2 We will only share your information with third parties in the UK who comply fully with the GDPR and UK data protection laws.
- 5.3 We will only share data with third parties outside the EEA, where we have entered into a contract (which includes terms approved by the European Commission) to ensure that the third party protects your personal information in accordance with applicable laws and in the same way we would.
- 5.4 Your personal information is stored on servers which are hosted at Abu Dhabi Islamic Bank PJSC (UAE). This information is transferred on the basis that we have entered into a contract (which includes terms approved by the European Commission) to ensure that Abu Dhabi Islamic Bank PJSC (UAE) protects your personal information in accordance with applicable laws and in the same way we would. A copy of the relevant data protection clauses can be obtained by emailing the company at [REDACTED].
- 5.5 Your information may also be shared with and processed by the following third parties, who may be based inside or outside of the EEA:
  - Our parent, ADIB UAE (which is based outside the EEA), for the necessary implementation of employment arrangements;
  - Our third-party payroll provider, for the purposes of processing our monthly payroll and any statutory pay employees are entitled to.
  - Third-party referencing agents for the purposes of carrying out pre-employment and ongoing screening, including criminal records and credit checks; and;
  - Third-party providers of employee benefits, including pension and healthcare benefits.
- 5.6 For specific details on what personal information is/has been shared with third-parties, please contact us at [REDACTED].
- 5.7 We will not share your information with any other party except:
  - a. where we have your explicit consent;
  - b. where we required to do so by law and/or regulations. In these circumstances the information may be shared with regulators, law enforcement agencies, judicial bodies, government entities, tax authorities or regulatory bodies around the world;
  - c. with agents and sub-contractors acting on our behalf, such as consultancies and external auditors;
  - d. with criminal and fraud prevention agencies;
  - e. where permitted by law, it is necessary for our legitimate interests or those of a third party, and it is not inconsistent with the purposes listed above.

## 6. How long we keep your information

- 6.1 Through the course of our relationship, we create physical and electronic records that contain your information, such as performance records. The purpose of creating, and managing, records is to enable us to perform and assess contractual obligations and to comply with legal and regulatory requirements.

- 6.2 We only ever retain personal information for as long as is necessary and we have strict review and retention processes in place to meet these obligations.
- 6.3 We determine record retention periods based on the type of record, the nature of the activity, the purpose for which it was collected/created and the applicable legal and/or regulatory requirements.
- 6.4 We normally keep employee records for a minimum of 6 years from the date your relationship with us ends. Some records are kept for shorter periods, for example 90 days for CCTV records and some for longer periods such as details parental leave taken which will be kept up to when the child concerned reaches 18 years of age. Retention periods may be changed from time to time based on business or legal and regulatory requirements. Pension details and any information relating to the senior management team is kept indefinitely for legal purposes.
- 6.5 In some circumstances, we may retain your information for longer periods, for example due to an investigation and/or order for regulatory and law enforcement agencies.

## 7. Security

- 7.1 We take your privacy seriously and are committed to taking every reasonable measure and precaution to protect and secure your information. We work hard to protect your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, including encryptions, firewalls, restricted access/clearance levels, training, policies & procedures, regular password changes and anti-virus/malware.

## Annex A: Purpose of Processing

Abu Dhabi Al Islami UK takes your privacy very seriously and will only use and share your information where it is necessary for us to carry out our lawful business activities.

We process your personal information on 3 lawful bases:

1. Contractual Necessity
2. Legal Obligation
3. Legitimate Interests

Please see below for details of how your personal information may be processed.

### 1. CONTRACTUAL NECESSITY

We may process your information where it is necessary to enter into an employment contract with you and to perform our obligations under that contract.

This may include processing to:

- a. Assess and process job applications;
- b. Assess suitability for roles;
- c. Assess performance;
- d. Conduct pre-employment and ongoing screening including DBS checks and credit checks;
- e. Conduct reference checks;
- f. Maintain attendance and absence records;
- g. To submit controlled person applications to the regulators;
- h. Make job related payments to you and pay relevant taxes to the HMRC;
- i. Communicate with you.



## 2. LEGAL OBLIGATION

We are legally required to collect and process certain personal information about you both at the beginning and throughout the duration of your relationship with us.

This may include processing to:

- a. Confirm and verify your identity;
- b. Perform checks for the purpose of detecting and preventing crime and to comply with laws relating to financial crime including money laundering, international sanctions, terrorist financing, fraud and bribery and corruption. This may involve processing information about criminal convictions and offences, investigating suspected financial crimes, fraud and threats and sharing data with law enforcement and regulatory bodies. This may involve sharing your information with Abu Dhabi Islamic Bank PJSC (UAE) – please refer to section 5 of this Privacy Notice for details of how we protect your personal information when we transfer data to Abu Dhabi Islamic Bank PJSC (UAE);
- c. Communicate with you in relation to updates to employment terms and conditions;
- d. Conduct investigations, for e.g. conduct breaches and breaches of our internal policies;
- e. Deal with grievances raised by or against you;
- f. Deal with disciplinary actions;
- g. Address litigation and regulatory investigations and other regulatory matters;
- h. Share information with government registries, regulators, law enforcement, tax authorities and other government and fraud prevention agencies. This includes reporting suspicious activity and responding to production and court orders;
- i. Publish financial reports, where legally required;
- j. Analyse data for the purposes of addressing issues and improving data quality;
- k. Provide assurance to law enforcement and regulatory bodies that we have implemented effective risk management and mitigation controls in relation to the risks we are exposed to;
- l. Address incidents/emergencies on the our premises; and
- m. Coordinate responses to disruptive incidents to ensure that we can continue to operate.

### 3. LEGITIMATE INTERESTS OF Abu Dhabi Al Islami UK

We may process your information where it is in our legitimate interests do so and without prejudicing your interests or fundamental rights and freedoms. It is within our legitimate interests to ensure that our processes and systems operate effectively and that we can continue operating as a business. We may process your information in the day-to-day running of our business, to manage our business and financial affairs and to protect our customers, employees and property.

This may include processing your information to:

- a. monitor, maintain and enhance internal business processes, communications solutions and services and information and data, technology;
- b. ensure network and information security, prevent and detect criminal activity and protect employee and customer personal information. This may include monitoring access to our information technology, telecommunications systems and websites,
- c. respond to information technology and business incidents and emergencies;
- d. ensure business continuity and disaster recovery;
- e. Report and provide assurance on our risk management to internal committees and management and regulatory and supervisory authorities;
- f. conduct general, financial and regulatory accounting and reporting;
- g. assess the quality of our customer services
- h. provide and arrange staff training;
- i. make travel arrangements;
- j. premises management and monitoring for the purpose of the detection and prevention of criminal activity, prosecution of offenders, identifying accidents/incidents and emergency situations; and
- k. protect our legal rights and interests.

