



# BT employee privacy notice

Current version - applicable from 23 May 2018

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## Our employee privacy notice

### Welcome

We want you to be confident we'll protect your personal information and respect your privacy. This notice explains how we use your personal information - what information we collect about you (including from third parties), why we collect it, what we do with it and on what basis.

Please read it carefully. It applies to personal information we collect about **Our People** worldwide in recruitment, during employment and after they leave us. It also applies if you need to give us personal information about someone else.

We regularly review our privacy notice. It was last updated on 23 May 2018. We'll post any changes to the privacy notice here and take reasonable steps to provide notice of those changes.

We've included a [glossary](#) which explains the meaning of any technical terms we use.

### Who does this affect?

By **Our People** and "you" we mean prospective, present and past employees, contractors, agency staff and people connected to you (such as the person you nominate to contact in an emergency).

BT is a group of companies made up of BT Group plc and BT plc, and all subsidiaries of these companies. This includes Plusnet Plc, EE Ltd, BT Facilities Services Ltd and Openreach Ltd amongst others. By "we", we mean the company within the BT group you are employed by, have applied for a role with or used to work for.

If you need to give us personal information about another person in relation to your employment, this notice will also apply to that personal information.

### What happens if I am based outside the UK?

There may be additional guidance issued in your country of employment. That guidance will take precedence over this notice.

### What's not included?

This notice doesn't apply to the information we hold about companies or other organisations. The privacy notice is intended to tell you how we use personal information but is not intended to create a contract with you.

This notice doesn't apply to other companies or organisations collecting and using your personal information. You should review their privacy policies before giving them your personal information.

## What information we collect and what we use it for

### **What kinds of personal information do we collect and how do we use it?**

The personal information we collect about you depends on your circumstances, your role, the law and whether you are a prospective, current or past employee. We also reserve the right to monitor electronic communications, such as email or internet usage, sent using the accounts we provide to you for work purposes.

We've explained the different ways we use your personal information below.

### **For recruitment purposes**

We will use your personal information to assess whether you are suitable for a role with us and put in place arrangements for any interviews and assessments. This applies whether you have made an application direct to us, through an agency or a third party.

This means we'll:

- Assess your suitability to do the job you have applied for.
- Contact you to arrange, conduct, evaluate and feedback on assessments and interviews, and where successful to make and offer and provide contract of employment.
- Carry out pre-employment checks which would include your legal right to work, carrying out criminal record and credit checks and follow up references provided to us. More details about these checks are set out below.
- Look for reasons why you left us if you have worked for us before, check whether you have applied before, ask why you have declined a job offer from us if you do and see if you would be interested in other roles with us (you can always ask us not to contact you and we won't).
- Make reasonable adjustments to the recruitment process based on accessibility requirements you make us aware of or we become aware of.
- Track how we deal with applications as part of our equal opportunities in employment monitoring to enable us to identify any areas that require steps to be put in place.

We use the following personal information to carry out your recruitment:

- Your contact details and other information to confirm your identity and your communications with us. This includes your name, gender, address, phone number, date of birth, and email address, national insurance number and bank details if you are successful. We also collect documents to verify this information such as your passport, driving license, photographs and electronic signatures.
- Further information about you to help us understand you better, so we can assess adjustments which need to be made or work restrictions which may apply. This may include your nationality, preferred language, and details of any accessibility requirements.

- Information from you about your health, race, ethnic origin, religion, sexual orientation, which we only use to comply with equality and diversity requirements as an employer.
- Information about your employment history. This includes your CV, resumes, application forms, references, records of qualifications, skills, training and other compliance requirements.
- Records of when you contact us, this includes emails, webchats and phone conversations.

Unless otherwise stated above we use this information as it is in our legitimate interests as a recruiter to fully understand and assess an applicant's suitability for a role and verify the information provided to us.

### **Whilst you work for us**

We will mainly use your personal information for the **purposes of your employment contract with us**. This means we'll:

- Carry out our role as your employer by paying you, managing expense and overtime claims, assessing your performance, helping change your work pattern when appropriate, arranging business travel, providing you with HR support and case management, and developing your skills (such as training and certifications).
- Offer you the chance to choose benefits such as Your Rewards and Plusnet Perks, where you are eligible. This may involve us passing appropriate personal information on to the relevant third party benefit provider so they can contact you, or you may register with them direct.
- Respond to requests made of us such as internal job applications, references, grievances and anything else required under our contract with you.

We'll also use your personal information **to comply with our legal obligations**. This means we'll:

- Monitor and document activity as required to demonstrate legal compliance. This includes conflict of interest records, gifts and hospitality and anti-bribery and corruption reporting (including managing our 'Speak Up' whistleblowing service) and mandatory training certifications.
- Provide you with pension and life cover benefits, and manage and administer your benefits (including your and our own contributions) in accordance with the applicable scheme rules. We are required by law to provide you with a pension. Our pension and life cover plans are managed by third parties on our behalf, which third party will depend on the plan or scheme you are a member of. We will provide your personal details to them so they can contact you. We will also provide the details of any beneficiaries you nominate for death or other benefits to the relevant third party.
- Provide you with health and safety support at work. This includes work related injuries, illness, management of your health and safety, providing any accessibility support you may need (including where you make us aware in your health

declaration on joining us and as updated by you when appropriate) and contacting your emergency contact if ever needed. This may include us making a referral to the occupational health service and assisting you with ill health retirement applications.

- Further information about you. This may include your information relating to your health, nationality, race, religion, ethnic origin, preferred language, sexual orientation details of any accessibility requirements you have, criminal offences (more details below), proceedings and/or convictions and anything which would restrict your ability to work, and for us to comply with equality and diversity requirements as an employer.
- Use information as needed to prevent and detect unlawful activity. This may include the use of biometric information such as retina scans and fingerprints for secure building access.
- Compile and manage our case in a legal claim made by or against us. Such processing is subject to strict confidentiality provisions.
- Offer you the chance to join a share plan if you are eligible to join. We are required by law to make this offer. We will also register you for a share account if you chose to buy BT shares. The share plans are managed in their entirety by Equiniti but we provide your personal details to Equiniti to allow them to contact you.

We'll use your personal information **where we have a legitimate interest in doing so** to promote and protect our business to do so. This means we'll:

- Manage our security and finances. This includes managing IT and building access rights and security monitoring, detection and prevention measures, forecasting, budget and account management and planning for the future.
- Handle requests that you may make to us. It could be to help you participate in activities and programmes as an eligible employee, or to match donations to non-profit organisations.
- Keep you up to date with our plans, how we are performing as a business and contact you on special occasions such as your birthday and to recognise 'length of service' milestones working for us (but you can always ask us not to).
- Conduct business reporting and analytics. Your data, if used, will normally be anonymised so that you would not be personally identified.
- Take measures to protect our business by preventing and detecting crime.
- Monitor our behaviour as an employer in accordance with equal opportunities in employment.
- Respond to and manage our case in a legal claim made by or against us. Such processing is subject to strict confidentiality provisions. This could include an accident at work.
- Share with other organisations to comply with our obligations in connection with your employment, such as HMRC, our shareholder management company (Equiniti), pension and life cover scheme or provider details, reference requests and any professional bodies.

We'll use your personal information **where you have asked us to or where you have told us it is ok**. This means we'll:

- Capture your trade union membership details so we can process your subscription fee, or ask them to be part of an investigation into an accident at work, or wherever you ask us to contact them on your behalf.
- From time to time need to use your personal information to help run our business for example, photos or video footage which feature you (not CCTV). We will check you are happy to take part before.

We'll use these types of personal information to do this:

- Information to contact you, verify who you are and set you up as an employee on our systems, including pay, IT and building access. This includes your name, address, phone numbers, date of birth, email address, gender, national insurance number, bank account details, next of kin, emergency contact details, the EIN we assign you, a photo of you, your driver's license, and electronic signatures.
- Information collected during recruitment.
- Information about your work contract, attendance and performance like start date, place(s) of work, performance reviews, development notes and plans, records of your training, HR records such as leave, sickness, grievances and other compliance requirements.
- Information about your shift pattern, if needed for your role, as part of planning and paying you for overtime due.
- Trade union membership details so we can process your subscription fee, if you have asked us to.
- Information about your pension, share plan and employee benefit options.
- Information generated when you visit our premises. This includes use of your pass card and CCTV footage. In the UK, we also use tracking devices in some of our fleet vehicles.

We collect the majority of this information directly from you, but in some cases we'll collect it from third parties.

### **After you leave**

We have certain obligations as a business which mean we may need your personal information after you end your employment with us. We'll keep some of your personal information for the following purposes:

- To deal with claims or disputes involving you or others. This could include an accident at work. We do this because we have a legal obligation to provide the information, or it is in our interests to bring or defend a claim.
- To understand and evidence decision making in your role and maintain knowhow within the business after you leave. And to understand why you left us. We do this because it is in our interests to use the information to help run our business, or it may be to support a legal obligation we have.
- To manage and administer your pension and any ongoing entitlements as we have a legal obligation to do so.

- To administer your dividend for your BT shares. We do this because we have a contractual commitment to do this.
- To comply with obligations to third parties in connection with your employment, such as the HMRC, our shareholder management company (Equiniti), reference requests, any professional bodies and contractual commitments we have with our customers and suppliers.

We'll use these types of personal information to do this:

- Your contact details and anything needed to verify who you are. This includes your name, address, phone numbers, date of birth, email address, national insurance number, bank account details, the EIN we assigned you and a photo of you.
- Further information about you. This includes your gender, nationality, race, ethnic origin, religion, sexual orientation, preferred language, health and details of any accessibility requirements you have, criminal offences, proceedings and/or convictions and anything which would restrict your ability to work.
- Information about your time with us. This includes your start and finish date, contract of employment, place(s) of work, appraisals, development notes and plans, emails, records of your training, HR records such as leave, sickness, grievances and occupational health service reports and other compliance requirements.

### **Monitoring of work communications**

We reserve the right to monitor electronic communications sent using the accounts, network and equipment we provide to you for work purposes. This means:

- We record your use of our communications services and activities. This includes your emails, chat clients, instant messenger, applications, phones, IT equipment and VPN and internet usage.
- We may monitor, record or analyse your usage in accordance with our IT and Security Policies. This may extend to third-party facilities, property and infrastructure as relevant to your job role, for example when you work on a customer's site.

We may need to access these communications for a range of reasons. These include complying with legal obligations placed on us to disclose information, to prevent or detect crime, or where we have a legitimate interest in doing so to promote and protect the interests of our business. We may need to access records of your communications even after you have left us.

If your communication relates to a personal matter, you should send it from a personal account.

Your use of public social media may be monitored or reviewed to check to ensure our business policies (such as those concerning social media, security and internet use and keeping commercially sensitive information confidential) are adhered to, and for investigating complaints and allegations of criminal offences.



## Sharing your information

### Who do we share your personal information with, why and how?

We share your personal information with other companies within the **BT Group**. We have entered into a group wide arrangement, known as **binding corporate rules**, to ensure your personal information continues to be subject to an adequate level of protection, regardless of which company in the BT Group holds that information.

If there's a change (or prospective change) in who owns BT or any of our assets, we may disclose personal information to the new (or prospective) owner. If we do, they'll have to keep it confidential.

We've set out how we share your information below. For more details, or if you would like a copy of our **binding corporate rules** or other mechanisms relating to a specific transfer, please contact us [here](#).

### The countries we disclose personal information to

Our **binding corporate rules** cover transfers to group companies in the following jurisdictions. Please note, your personal information is unlikely to be transferred to all of these jurisdictions in practice.

Algeria, Argentina, Australia, Bahrain, Bangladesh, Barbados, Bermuda, Bolivia, Bosnia and Herzegovina, Botswana, Brazil, Canada, China, Colombia, Costa Rica, Cote d'Ivoire, Dominican Republic, Ecuador, Egypt, El Salvador, Ghana, Gibraltar, Guatemala, Honduras, Hong Kong, India, Indonesia, Isle of Man, Israel, Jamaica, Japan, Jersey, Jordan, Kazakhstan, Kenya, Republic of Korea, Lebanon, Macedonia, Malawi, Malaysia, Mauritius, Mexico, Moldova, Montenegro, Morocco, Mozambique, Namibia, Nicaragua, Nigeria, Norway, Oman, Pakistan, Panama, Paraguay, Peru, Philippines, Puerto Rico, Qatar, Russian Federation, Serbia, Singapore, South Africa, Sri Lanka, Switzerland, Taiwan, Tanzania, Thailand, Trinidad and Tobago, Tunisia, Turkey, Uganda, Ukraine, United Arab Emirates, United States, Uruguay, Venezuela, Vietnam, British Virgin Islands, Zambia and Zimbabwe.

### In accordance with the law

We may have to disclose personal information about you to law enforcement agencies. The law enforcement agencies may ask for disclosure of one or more of the following items of personal information:

- Your contact details or information to validate your identity.
- Your payment and financial information.
- Information about your time with us.
- Records of your use of communications services and activities.

We disclose personal information to law enforcement agencies so they can detect and stop crime, prosecute offenders and protect national security. We only share your personal information in accordance with applicable law, we have strong internal oversight of what we do and we take expert advice to inform our approach. More details about the way we deal with disclosures to law enforcement agencies in the UK is available in our report on [Privacy and free expression in UK communications](#).

We will also share personal information about you where we are under a legal obligation to disclose it to another person. These obligations arise because of a law that obliges us to disclose that information or because of a court order requiring disclosure of that information.

We may also disclose information to a public authority. We only do this where they have provided assurance and we have assessed that their request is proportionate and necessary. For example, the disclosure of information to the Department of Work and Pensions in benefit cases.

### **To third-party service providers and customers**

We use third-party service providers to perform services on our behalf or to assist us with the provision of services to you. This could be for the purposes of your role, like a corporate customer for building and IT access purposes or unrelated to your role, like Your Rewards and Plusnet Perks, who offer discounts to you as an employee.

We may also need to share your information with insurance providers in relation to our insurance policies. If there's a change (or expected change) in who owns us or any of our assets, we might share personal information to the new (or prospective) owner.

Where we use a third-party service provider we have strict controls in place to ensure your personal information is properly protected.

Where we transfer your personal information to third-party service providers or other third parties for processing in countries that have not been found to be ['adequate'](#) by the European Commission then we only do so where we have [model contracts](#) or other appropriate safeguards in place.

We share your information with our customers where necessary to deliver services to them. This may be to let them know that you will be contacting them, that you are handling their query or will install their service. We also share your information with organisations that provide services to us, but only where necessary to provide that service.

### **Employee vetting**

We may carry out credit and fraud checks as part of our recruitment or, more rarely, on existing employees. To do this, we will supply your personal information to the credit reference agencies and they will give us information about you. The credit reference agencies may in turn share your personal information with other organisations. In the UK, the identities of the credit reference agencies, and the ways in which they use and share personal information, are explained in more detail [here](#).

In the UK, we may share your personal information with Cifas who will use it to prevent fraud, other unlawful or dishonest conduct, malpractice, and other seriously improper conduct. If any of these are detected, you could be refused certain services or employment. Your personal information may also be used to verify your identity. Further details of how your personal information will be used by us and Cifas can be found using the contact details [below](#).

Finally, we may carry out criminal record checks in some jurisdictions. In the UK we use the following [government organisations](#) to carry out criminal record checks as part of your recruitment, and if a role-change requires it. They will give us information about you.

- [Disclosure and Barring Service](#) (England and Wales)
- [AccessNI](#) (Northern Ireland)
- [Disclosure Scotland](#) (Scotland)

We carry out these background checks because we have a right, and duty to our other employees and our customers, to do all we can to make sure we employ safe and reliable people.

## Protecting your information and how long we keep it

### **How do we protect your personal information?**

We have strict security measures to protect your personal information. This includes checking your identity when you contact us and follow our security procedures.

### **How long do we keep your personal information?**

In the UK we'll keep:

- We keep recruitment information for 12 months should you reapply for another position becomes available you might be interested in (you can tell us if you don't want to be contacted)
- We keep most employment records for slightly more than 6 years after you leave (74 months). we do this because they may be needed in case a legal claim is brought against us
- We keep some employment information for a much longer period. For example, we keep pension and occupational health records for 30 years after you leave. We do this because they may be needed in case a legal claim is brought against us.

In other cases we'll store personal information for the periods needed for the purposes for which the information was collected or for which it is to be further processed. And sometimes we'll keep it for longer if we need to by law. Otherwise we delete or anonymise it so that you cannot be identified and it can no longer be associated with you.

## Accessing and updating how we use your information

You can access and update the personal information we hold about you.

### Want a copy of the information we hold about you?

If you are a current employee, you can access a copy of your **HR records** and **payslips** via our HR System and other intranet-based tools. Please check here:

	<b>Pay information</b>	<b>HR services</b>
<b>BT</b>	<i>[internal BT hyperlinks have been removed from this copy for security purposes]</i>	<i>[internal BT hyperlinks have been removed from this copy for security purposes]</i>
<b>EE</b>	<i>[internal BT hyperlinks have been removed from this copy for security purposes]</i>	<i>[internal BT hyperlinks have been removed from this copy for security purposes]</i>
<b>Plusnet</b>	<i>[internal BT hyperlinks have been removed from this copy for security purposes]</i>	<i>[internal BT hyperlinks have been removed from this copy for security purposes]</i>

If you want information about your **shares** or your **pension**, you will need to contact the relevant administrator, provider or management company direct or access their online.

If you want to access your information to get a **reference**, for employment or personal reasons, you can do so by using the following links or email us, depending on which is relevant to you:

- BT – *[internal BT hyperlinks have been removed from this copy for security purposes]*. For ex-employees please email us at: [hrservices.references@bt.com](mailto:hrservices.references@bt.com)
- EE – [hr.administration@ee.co.uk](mailto:hr.administration@ee.co.uk)
- Plusnet - [grouphr@plus.net](mailto:grouphr@plus.net)

Otherwise you can access a copy of the personal information we hold about you by completing our online form via your HR System. For applicants or ex-employees please contact us using the email addresses listed below.

	<b>Applicants and ex-employees</b>
BT	<a href="mailto:cpo@bt.com">cpo@bt.com</a>
EE	<a href="mailto:hr.administration@ee.co.uk">hr.administration@ee.co.uk</a>
Plusnet	<a href="mailto:pnlegal@plus.net">pnlegal@plus.net</a>

In some cases, you can ask for your personal information to be provided in a portable format. It'll normally take us one month to get back to you but could take longer (a further two months) if it's a complex request or we get a lot of requests at once. We'll reply electronically unless you ask us to send it by post.

We'll always try to help you with your request. We can decline if we believe doing so would adversely affect others or the law stops us. And even though we have to complete your request free of charge, we are allowed to reject requests if they're repetitive, you don't

have the right to ask for it or the requests made are excessive. If that's the case, we'll explain why we believe we don't have to fulfil the request.

### Concerned about what we are doing with your personal information?

You can ask us to **correct, complete, delete** or **stop using** any personal information we hold about you. For current employees - can make any changes you want by accessing your personal details page on the relevant HR System or other intranet-based tools such as Directory or BASOL. To exercise these rights in other cases, please use the online forms or contact us using the links or email addresses below.

	<b>Applicants and ex-employees</b>
BT	<a href="mailto:cpo@bt.com">cpo@bt.com</a>
EE	<a href="mailto:hr.administration@ee.co.uk">hr.administration@ee.co.uk</a>
Plusnet	<a href="mailto:pnlegal@plus.net">pnlegal@plus.net</a>

From time to time we may use your personal information for things like surveys, competitions and research. This is entirely optional.

If you want to opt out of receiving any communication from third parties which is unrelated to your contract with us, past or present (for example from BT Shop) you can 'unsubscribe' or contact our HR Helpdesk to assist.

Where we process your personal information on the basis of your consent, you can withdraw that consent by completing the form as detailed above. However, your withdrawal of consent only applies to how we use your personal information in the future, not what we've done in the past.

In some cases, we might have to continue to use or keep information, even if you ask us not to. That could be for legal or regulatory reasons, to comply with our obligations under our contract, or for another legitimate reason. But we'll always tell you why. For example, we have to offer the saveshare to every eligible employee as it is a tax advantage plan. You can only opt out of receiving communications in one saveshare scheme year. We have a legal obligation to invite you to join the scheme in the next tax year, if you are eligible to do so.

When you delete or change (or ask us to delete or change) your personal information from our systems, we might not do so straight away from our backup systems or residual copies on our active servers. And we may need to keep some information to fulfil your request (for example, keeping your email address to make sure it's not on a marketing list).

If you do not provide your personal information, provide it inaccurately or require us to delete it, then we may not be able to provide you with a contract for employment or carry out our obligations, such as paying you. It may also prevent us complying with our legal obligations, like paying your tax.

## How to contact us and further details

### Who to contact if you have a question about how we use your personal information?

If you'd like any more details, or you have comments or questions about our privacy notice, write to us at:

**BT's** data protection officer by email [cpo@bt.com](mailto:cpo@bt.com) or post at:

PO Box 2681  
BT Centre  
81 Newgate Street  
London  
EC1A 7AJ

**EE's** data protection officer by email [hr.administration@ee.co.uk](mailto:hr.administration@ee.co.uk) or post at:

HR Service Centre  
EE Ltd  
Capricorn (Post Point 15)  
2620 Aztec West  
Almondsbury  
Bradley Stoke  
Bristol  
BS32 4QJ

**Plusnet's** data protection officer by email [pnlegal@plus.net](mailto:pnlegal@plus.net) or post at:

Plusnet plc  
The Balance  
Sheffield S1 2GU.

If you want to make a complaint on how we have handled your personal information, please contact the relevant data protection officer who will investigate the matter and report back to you. If you are still not satisfied after our response or believe we are not using your personal information in line with the law, you also have the right to complain to the data-protection regulator in the country where you live or work. For the UK, that's the Information Commissioner - <https://ico.org.uk/>.

### How will we notify you of changes to the notice?

Our privacy notice might change from time to time. We'll post any changes on this page for a minimum of 30 days.

## Glossary

We have included a description of how the technical terms we use are generally interpreted.

- **Anonymised data** means data which has had all personally identifiable information removed.
- **Binding corporate rules** are designed to allow multinational companies to transfer personal information from the European Economic Area (EEA) to their affiliates outside of the EEA and to keep to data-protection legislation.
- **Model contracts** are standard contractual clauses set by the European Commission. They offer enough protection of people's privacy, fundamental rights and freedoms when their personal information is moved from within the EEA to outside of it. The contracts keep to data protection legislation.
- **Personal information** means information that identifies you as an individual, or is capable of doing so.