

*Les
Ambassadeurs
Club*

DPP: Employee Privacy Policy



Les Ambassadeurs Casino®

Corporate Compliance Policy

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DPP: Employee Privacy Policy

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CORPORATE COMPLIANCE
GENERAL DATA PROTECTION REGULATION (GDPR)

DPP: Employee Privacy Policy

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Corporate Commitment

Les Ambassadeurs Club Limited [Les A] is committed to best corporate governance practices. The Les A Board is responsible for establishing policies and procedures to enable compliance within its operational business. Each Director of the Les A Board shall exercise independent judgment and act honestly and in the best interests of the Company. The Les A Board is also committed to exercising effective governance over the Company's affairs and to balance the respective interests of the Company's stakeholders (including its shareholders, employees and customers) and also of the broader community.

Les A is committed to:

- conducting its business with integrity and to adopting respectable and ethical standards,
- acting across its business interests with due care and diligence; and
- complying with its statutory obligations.

Les A will ensure that its employees are aware of and comply with the licensing objectives and will deal with the Gambling Commission in an open and cooperative way. We are committed to socially responsible gambling and have adopted and support the *Playing Safe* initiative introduced by the National Casino Forum. The policies and procedures we have in place are in accordance with the three licensing objectives of the Gambling Act 2005:

- Preventing Gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime;
- Ensuring that gambling is conducted in a fair and open way; and
- Protecting children and other vulnerable persons from being harmed or exploited by gambling.

Les A operates through its Club Rules, policies that have been approved by the Board of Directors, Procedure Manuals and an Employee Handbook.

Les A has internal procedures in place to ensure that its business is conducted in compliance with all relevant primary and secondary legislation and regulatory guidance. The Company will ensure that all procedures are communicated to all appropriate staff and personnel who are required to hold a Gambling Commission Personal Licence have the requisite competency for the licence held and the responsibilities associated with that position. Les A has well established staff practices and procedures in place, including procedures for staff to report grievances or suspected regulatory breaches through a Whistleblowing policy.

Regular reviews of the effectiveness of all policy and procedures are carried out in addition to audits periodically undertaken by the Internal Audit function of Les A. A suitably qualified third party resource is engaged to review Les A policies and procedures on an annual basis which provides the Board and the Regulatory Compliance Committee with the necessary assurance regarding the operating effectiveness of the organisation's controls.

We believe that a well-structured and organised corporate business with well-trained management and staff is essential to our success. We will deliver this success within the UK gambling legislative framework, working with our regulator through our management and compliance departments.

Kevin McGowen
Chief Executive Officer
Les Ambassadeurs Club

1: Responsibilities

The Director of Human Resources is responsible for ensuring that this Employee Privacy Policy (the “**Notice**”) is made available to all employees of Les Ambassadeurs Club (“**Les A**”) and throughout the organisation prior to Les A collecting/processing their personal data.

Human Resources alongside all Supervisors, Managers, Heads of Department and Directors of Les A who interact with employees and or have access to employee information are responsible for ensuring that this Notice is drawn to the employee’s attention (for the awareness of existing employees) and during the induction process of all new employees.

2: Introduction

The Proprietor and Owner of Les Ambassadeurs Club (“Les A”) is Les Ambassadeurs Club Limited. Registration No 02708889.

The name of the Company Les A is "Les Ambassadeurs Club" ("Les A" or “we”) and its address is 5 Hamilton Place London W1J 7ED. Les A is regulated and licensed by the UK Gambling Commission and holds an Operating Licence. Les A is a Data Controller registered with the Information Commissioner’s Office, registration no. Z5542615.

This Employee Privacy Policy (the “Notice”) sets out what personal data we hold about you and how we collect and use it, both whilst you are working for us and after you have left. It applies to current and former employees.

We are required by data protection law to give you the information in this Privacy Policy. It is important that you read the Privacy Policy carefully, together with any other information that we might give you from time to time about how we collect and use your personal data. You should also read our suite of Data Protection Policy and Procedures which explains our obligations in relation to personal data and how we keep it secure, as well as what we expect from you when you are handling personal data during your work.

This Notice applies as from 25 May 2018, when the General Data Protection Regulation came into force. It does not form part of your contract of employment or other contract to provide service and does not give you any contractual rights. We may update this Notice at any time.

We want all our employees and workers including *contractors, agency workers, consultants, interns, volunteers and directors* (together referred to as ‘Employees’ or ‘you’), to know that we are just as concerned as you are about the privacy of any personal information that you may choose to provide us ("Personal Information") to facilitate the terms and conditions of employment, to ensure that we meet all relevant employment laws within the United Kingdom (UK).

Our Data Protection Officer is Ryan Best, Surveillance & Security Manager (DPO) who can be contacted at DPO@LesaClub.Com. As DPO, he is responsible for informing and advising us about our data protection law obligations and monitoring our compliance with these obligations. The DPO also acts alongside the Human Resources Department, as your first point of contact if you have any questions or concerns about data protection.

3: What Types of Personal Data Do We Hold About You?

Any Personal information you provide to us is subject to the terms of this Notice and the terms and conditions of your employment.

Personal data means any information relating to a living individual who can be identified (directly or indirectly) by reference to an identifier (e.g. name, NI number, employee number, email address, photos, CCTV footage (physical features)). It can be factual (e.g. contact details or date of birth), an opinion about an individual's actions or behaviour, or information that may otherwise impact that individual in a personal or business capacity.

We hold and use various types of personal data about you, including, for example: biographical details; recruitment information; details of the terms of your employment with us; pay and benefits details; working hours; performance information; details of your holidays and other leave; disciplinary, conduct and grievance matters; employee representation; health and safety; CCTV and audio footage; business equipment, technology and systems usage information, etc.

Data protection law divides personal data into two categories: ordinary personal data and a sensitive category of data. Any personal data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health conditions, sexual life or sexual orientation, or biometric or genetic data that is used to identify an individual is known as **sensitive data** (The rest is **ordinary personal data**).

We hold and use various types of sensitive data about you, including: sickness absence and medical information; details of family leave, religious beliefs, sexual life or sexual orientation; equal opportunities monitoring data which could include information about your race or ethnicity, religious beliefs, sexual orientation or health; trade union membership; biometric data used to identify you.

4: Why Do We Hold Your Personal Data and On What Legal Grounds?

We hold and use your ordinary personal data for employment, HR and business administration purposes. This will include, for example: management of our employment relationship with you; administration of pay and benefits; monitoring and assessment of performance; provision and regulation of holidays and other leave; addressing conduct, disciplinary and grievance issues; performance of day-to-day business activities, etc.

Data protection law specifies the legal grounds on which we can hold and use personal data.

Most commonly, we rely on one or more of the following legal grounds when we process your personal data:

- Where we need it to perform the contract, we have entered into with you (**performance of the contract**) whether this is an employment contract, a contract for services or another type of contract. This may include, for example, ensuring that we pay you correctly and that we provide your contractual holiday entitlement.
- Where we need it to comply with a legal obligation (**legal obligation**). Typically, this may include legal obligations: to provide statutory holidays and statutory family leave and pay (maternity, paternity, adoption, shared parental, etc.); to pay the National Living Wage /National Minimum Wage; to comply with limits on working time; to meet health and safety

requirements; not to discriminate or dismiss Employees unfairly.

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests (**legitimate interest**). This may include, for example, managing working hours to ensure effective business operations, and monitoring your use of computers or other technology.

We hold and use your sensitive data for purposes including, for example: managing absence and ensuring cover; making adjustments to your job to accommodate health conditions; facilitating the taking of family related leave; paying sick pay, maternity, paternity, adoption or shared parental pay as applicable; monitoring equality of opportunity and diversity in our organisation, paying trade union subscriptions, facilitating meetings with trade union representatives, permitting time off for trade union activities; ensuring security of laptops/controlling access to our premises.

Since sensitive data is usually more sensitive than ordinary personal data, we need to have some additional legal grounds to use and hold it. Most commonly, as well as one of the legal grounds listed above, we rely on one or more of the following additional legal grounds when we process your sensitive data:

- Where we need to exercise our legal rights or carry out our legal obligations in relation to employment or social security and the processing is in line with our Data Protection Policy (**legal obligation/right in relation to employment**).
- Where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme, and in line with our Data Protection Policy (**public interest in monitoring equal opportunities within the workforce**).
- Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards (**assessment of working capacity**).

Occasionally, we may also hold and use ordinary personal data: in the public interest for the detection or prevention of crime; or where needed to protect your vital interests or those of another person. We may also occasionally hold and use sensitive data: to establish, exercise or defend a legal claim; where needed to protect your interests (or someone else's interests) where you are not capable of giving your consent; or where you have already made the information public.

Sometimes we may use your personal data for purposes that are different from or incompatible with those for which we collected it. If we do this, we will notify you and explain our legal ground for using your data in this way, as required under data protection law.

The Appendix to this Notice sets out in more detail the types of ordinary and sensitive data we collect and hold about you, what we use it for, who we share it with and the relevant legal grounds under data protection law for doing so.

5: How Do We Collect Your Personal Data?

You provide us with most of the personal data about you that we hold and use. Other personal data about you we hold and use, is generated by you in the course of carrying out your duties. For example, CCTV footage, online images, email correspondence, when producing documents or when you are using certain equipment such as computers, door entry systems/clocking-in and out systems.

Some of the personal data we hold and use about you is provided by or generated from internal sources during the course of running our business. For example, colleagues may refer to you in emails or documents, your manager will assess you as part of the appraisal process and information about you may be generated as part of our business and operational planning.

Some of the personal data about you that we hold and use, may come from external sources. For example: when we offered you a job, we may have collected references from previous employers; we may obtain information about you from publicly available sources such as your LinkedIn profile or other media sources; we may ask for a report from an occupational health professional if you have long-term sickness absence; customers may give feedback about you; we might seek advice from a professional adviser that includes information about you; or your TU representative might correspond with us in particular situations.

6: If You Give Us Someone Else's Personal Data

Sometimes, you might provide us with another person's personal data – e.g. details of your emergency contact or next of kin. In such cases, we require you to inform the individual what personal data of theirs you are giving to us. You must also give them our contact details and let them know that they should contact us if they have any queries about how we will use their personal data.

7: Who Do We Share Your Personal Data With?

We will only share your personal data with third parties where we have an appropriate legal ground under data protection law which permits us to do so. Commonly, this could include situations where we are legally obliged to provide the information (e.g. to HMRC for tax purposes), to comply with our contractual duties (e.g. to providers of your contractual benefits such as occupational pension, health insurance, etc.), or where it is necessary in our legitimate interest (e.g. to an IT service provider for maintenance of our IT systems).

Further details of who we share your personal data with, and our purposes and legal grounds for doing so, are set out in the Appendix to this Notice.

8: Consequences of Not Providing Personal Data

We only ask you to provide personal data when we have a good reason and there may therefore be consequences if you do not provide information to us.

Some of the personal data you provide to us is required by law. For example, if you do not provide your national insurance number, we will not be able to make correct tax/NI deductions on PAYE, and, if you are pregnant, we require a MATB1 in order to pay statutory maternity pay.

We may require you to provide other personal data, where it is necessary for us or our pensions/benefits providers to fulfil our contractual obligations to you, or for you to fulfil your contractual obligations to us, or where our use of the data is necessary in our legitimate interests. For example, if you do not provide us with a timesheet, we cannot pay you for the hours you have worked / if you do not complete the application form for health insurance, we cannot provide you with health insurance.

If you choose not to provide us with personal data requested, we will tell you about the implications of any such decision at the relevant time.

9: How Long Will We Keep Your Personal Data?

We will not keep your personal data for longer than we need it for our legitimate purposes.

We consider the following criteria when determining the appropriate retention period for Employees' personal data:

- the amount, nature, and sensitivity of the personal data
- the risk of harm from unauthorised use or disclosure
- the purposes for which we process your personal data and how long we need the data to achieve these purposes
- how long the personal data is likely to remain accurate and up-to-date
- for how long the personal data might be relevant to possible future legal claims
- any applicable legal, accounting, reporting or regulatory requirements that specify how long certain records must be kept

Given the variety of Employees' personal data that we use and the varying circumstances in which we use it, it is difficult to specify ahead of time precisely how long we will keep particular items of personal data. Where possible, the Tables in the Appendix to this Notice identify retention periods applicable to your personal data, which have been determined based on the above criteria and which represent the longest period for which we will ordinarily keep it. We may often keep particular items of your personal data for less time. However, there may also be circumstances in which it is appropriate for us to keep particular items of your personal data for a longer period than that set out in the Tables. In particular, we will always keep your personal data for so long as we are required to do so under legal, accounting, reporting or regulatory requirements.

In addition, for some types of personal data, it is more appropriate to decide retention periods on a case by case basis (also using the criteria described above), and this is indicated in the Tables where applicable.

We will base these decisions on relevant circumstances, taking into account the criteria listed above.

10: Transferring Personal Data Outside The EEA

In the legitimate interests of providing the Les A on-line gaming service, the transfer of some of your personal data, such as your image, both still and live, to countries both within and outside of the EEA, will take place.

A transfer of personal data takes place when the data is transmitted or sent to, viewed, accessed or otherwise used in, a country outside of the EEA. Data protection law restricts transfers of personal data to countries outside of the European Economic Area (EEA) because the law in those countries might not provide the same level of protection to personal data as the law within the EEA. To ensure that the level of protection afforded to personal data is not compromised, we only transfer your personal data outside the EEA if certain conditions are met, as explained below.

For countries outside of the EEA, the following appropriate measures apply:

- Where there is an adequacy decision by the European Commission. This means that those countries are deemed to provide an adequate level of protection for your personal data.
- Where there is no adequacy decision in place for the relevant non EEA country, we have put in place the following appropriate measure to ensure that any personal data transferred to such countries is treated in a way that is consistent with and which respects the EEA and UK laws on data protection and receives an adequate level of protection: Contractual clauses imbedded within the agreements between Les A and the on-line service providers Evolution Gaming and their customers to ensure that any personal data leaving the EEA will be transferred in compliance with EU data-protection law.

11: Your Rights

You have a number of legal rights relating to your personal data, which are outlined here:

- **The right to make a subject access request.** This enables you to receive certain information about how we use your personal data, as well as to receive a copy of it and to check that we are lawfully processing it.
- **The right to request that we correct incomplete or inaccurate** personal data that we hold about you.
- **The right to request that we delete or remove** personal data that we hold about you where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- **The right to object to our processing** your personal data where we are relying on our legitimate interest (or those of a third party), where we cannot show a compelling reason to continue the processing.
- **The right to request that we restrict our processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **The right to request that we transfer** your personal data to you or to another party, in a structured format. This right applies in respect of data that you have provided where our legal ground for using the data is that it is necessary for the performance of a contract or that you have consented to us using it (this is known as the right to “data portability”).

If you would like to exercise any of the above rights, please contact the Human Resources Department representatives in writing. Note that these rights are not absolute, and in some circumstances, we may be entitled to refuse some or all of your request.

If you have any questions or concerns about how your personal data is being used by us, you can contact the Director of Human Resources, Lorinda Schutte - LorindaSchutte@lesaclub.com or the Data Protection Officer (DPO).

If you have any questions or concerns about how your personal data is being used by the Suen ownership group you can contact the Director of Human Resources, Lorinda Schutte - LorindaSchutte@lesaclub.com.

Note too that you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. Details of how to contact the ICO can be found on their website: <https://ico.org.uk>

12: Appendices – Further Details

This section of the Notice tells you in more detail about the type of personal data we hold about you, what we use it for, our legal grounds for doing so, who we share it with and how long we keep it.

Please note that we will not necessarily hold, use or share *all* of the types of personal data as described in this Appendix in relation to you. The specific types of data about you that we will hold, use and share will depend on your role, the terms on which you work for us, your individual circumstances and circumstances affecting the company from time to time. For example, if you do not have a work computer or use any other technical device in your role, we will not hold any computer or device usage records for you; if you work for us as a self-employed contractor, we will not hold records about benefits that you are not entitled to; if you have not yet taken a day off sick, we will not currently hold any sickness absence records for you; and we are only likely to share information about you with professional advisers in particular circumstances.

Note also that the first two Tables below divide items of personal data into relatively broad categories (under the heading *Type of ordinary personal data held by us*, or *Type of sensitive data held by us*). Where multiple purposes and/or legal grounds for our use of a given “type” of personal data are identified, this does not necessarily mean that ALL of the purposes and/or legal grounds are applicable to ALL items of personal data falling within that “type” of personal data.

Appendix A: More Information About Your Ordinary Personal Data

TYPE OF ORDINARY PERSONAL DATA HELD BY US	WHAT WE USE IT FOR	LEGAL GROUND	GUIDELINE RETENTION PERIOD
Biographical details (including name, title, contact details, DOB, gender, emergency contacts, photograph, fingerprint, recognition).	Administration of the contract, emergency contact details so we can look after your welfare in an emergency, gender for gender pay gap reporting, equal opportunities monitoring, DOB for Life Assurance reporting, HMRC, to avoid age discrimination, redundancy calculations, Internal PR efforts, i.e. CEO sends birthday cards photograph for ID badges and on intranet/web to help colleagues/customers/ security to identify you.	Legal obligation. Performance of the contract. In our legitimate interest to hold emergency contact details in order to inform a person nominated by you in an emergency situation. In our legitimate interest to use photographs to help colleagues/customers/ security to identify you.	During employment and up to 6 years after employment ends. Emergency contacts, photograph: during employment and up to 6 months after employment ends.
Recruitment information (including correspondence/references/routine screening for adverse media and or industry vulnerabilities (such as Social Responsibility and Harm Minimalisation factors)/ right to work checks and related documents).	Administration of the contract, to check and demonstrate compliance with statutory obligations, licensing conditions and the assurance that you have the legal right to work in the UK.	Legal obligation Performance of the contract In our legitimate interest to maintain relevant and appropriate records of recruitment for business administration and administration of your employment	During employment and up to 6 months after employment ends or in the event of an un- successful employment application. (Screening and Right to work checks - two years after employment ends).
Employment details (including name, title, address, DOB, gender to enable the routine screening for adverse media and or industry vulnerabilities (such as Social Responsibility and Harm Minimalisation factors)).	Administration of the contract on an ongoing basis throughout the life-cycle of your employment to ensure that we are upholding the statutory obligations imposed upon us, whilst maintaining a safe and secure working environment.	Legal obligation Performance of the contract. In our legitimate interest to maintain relevant and appropriate records.	During employment and up to - two years after employment ends.
Payroll, tax/NI and bank details.	Paying you, deducting tax and NI as appropriate, keeping appropriate records.	Legal obligation Performance of the contract	Payroll/tax/NI: Six years from the end of the financial year in which payments are made. Bank details: During employment and up to 6 months after employment ends.

TYPE OF ORDINARY PERSONAL DATA HELD BY US	WHAT WE USE IT FOR	LEGAL GROUND	GUIDELINE RETENTION PERIOD
Working hours and arrangements.	Paying you correctly. Complying with legal requirements regarding Working Time Regulations, Managing attendance, day to day operational management and dealing with requests to alter hours.	Legal obligation. Performance of the contract. In our legitimate interest to manage working hours/ arrangements to ensure effective business operations.	During employment and up to 6 months after employment ends.
Pay and benefits including pensions (and information necessary to administer these) and expenses.	Providing you with agreed pay, benefits and expenses; making decisions about future compensation; tracking and reviewing pay, benefits, expenses; making strategic decisions about compensation; auditing and reporting on company financial position and paying over benefits to relevant providers.	Legal obligation. Performance of contract. In our legitimate interest to analyse pay, benefits and expenses and make decisions about appropriate compensation on an individual and company level.	During employment and up to 6 years after employment ends. Pension data is retained for 12 years.
Performance and career progression (including appraisals, performance management, target/objective setting, consideration of new duties/roles).	Ensuring you perform in accordance with your contract and to the standards we require; considering future duties/roles; setting performance-related pay increases; determining eligibility for performance bonuses.	Performance of the contract In our legitimate interest to manage performance and duties/roles to ensure effective business operations and set appropriate levels of remuneration.	During employment and up to 6 months after employment ends
Qualifications (including educational, vocational, driving licences, PML, AML where appropriate) and training.	Ensuring you are appropriately qualified and trained for current or potential roles.	Legal obligation. Performance of the contract. In our legitimate interest to ensure that you have appropriate qualifications and training for your current or potential future roles.	During employment and up to 6 months after employment ends.
Holidays and other leave.	Managing statutory and non-statutory holiday and other leave.	Legal obligation. Performance of contract. In our legitimate interest to ensure leave taken is compatible with our business requirements and that any consequent operational adjustments are made.	During employment and up to 6 years after employment ends.

TYPE OF ORDINARY PERSONAL DATA HELD BY US	WHAT WE USE IT FOR	LEGAL GROUND	GUIDELINE RETENTION PERIOD
Disciplinary, conduct and grievance matters about you or involving you.	Investigating and dealing with disciplinary, conduct and grievance matters related to you or otherwise involving you.	Legal obligation. Performance of the contract. In our legitimate interest to deal effectively with disciplinary, conduct or grievance matters whether you are the subject of them or are otherwise connected to the issues raised. Public interest in detecting or preventing unlawful acts.	During employment in accordance with our disciplinary and grievance policies, and up to 12 months after employment ends.
Employee representation.	Establishing and facilitating consultation with staff forum/trade union on relevant matters.	Legal obligation In our legitimate interest to engage with appropriate Employee representatives on relevant matters	During employment and up to 6 months after employment ends.
Health and safety.	Conducting risk assessments; establishing safety measures to mitigate identified risks; providing a safe working environment; keeping required records; return to work interviews, incident reports, <i>Riddor</i> cases, relevant risk assessments.	Legal obligation. In our legitimate interest to ensure Employees are able to perform their duties in a safe environment for the efficient operation of the business.	Decided on a case by case basis in accordance with the criteria set out in this Notice, in particular any legal requirement to retain particular record.
Changing terms of employment or termination of employment.	Administration of the contract, making changes to the terms of employment to fit business requirements; managing our relationship with you on an ongoing basis including during notice; promotions, role changes, flexible working and other career progression; termination of the working relationship whether instigated by us or you; managing post–employment issues	Legal obligation. Performance of the contract. In our legitimate interest to manage, alter and, where relevant, to terminate the contractual relationship or respond to resignations and to deal effectively with post-employment issues.	During employment and up to 6 years after employment ends.
Identifying images (Still and live).	Live video streaming upon the Les A online gaming platform. Internal broadcasting upon electronic platforms. For example, Staff Notice Boards and WICKR.	In our legitimate interests of providing the on-line gaming service, (with facilities in place for you to withdraw consent, in part or wholly at any time). In some instances, the legal ground is the performance of the contract.	During employment and up to 1 year after employment ends.
CCTV footage, including Facial Recognition. (within the casino, audio	Primarily for security purposes, although we may also use CCTV footage when	Legal obligation. Performance of the contract.	The standard CCTV archiving is up to 60 days. Any subsequent archiving of CCTV incidents or investigations are

TYPE OF ORDINARY PERSONAL DATA HELD BY US	WHAT WE USE IT FOR	LEGAL GROUND	GUIDELINE RETENTION PERIOD
is also collected as part of the surveillance footage).	investigating allegations of misconduct by Employees. Such monitoring may be conducted in forms, both overt and covert.	In our legitimate interest to deal effectively with allegations of misconduct and to maintain the security of our premises.	subject to a full 5-year period and extended thereafter if relevant to the pursuance of legal enquiries / investigations.
Information about your use of business equipment, technology and systems including our computers/ telephones/mobile phones/ software/ applications/ social media/ door entry systems/clocking in-out systems/time recording /performance output monitoring.	Maintaining the operation, security and integrity of our business communications systems (e.g. protection from hackers, malware, etc.); providing IT and communications systems support; preventing excessive personal use; recording communications with customers for quality control and training purposes and dispute resolution, keeping premises secure; managing time; recording rate of work/efficiency of work.	Performance of the contract. In our legitimate interest to maintain operation, security and integrity of communications systems, prevent excessive use of business resources for personal purposes, and monitor and maintain quality of communications with customers; record time worked and rate/efficiency of work.	One year from date of last activity.
Personal data produced by you and others in the course of carrying out your job (e.g. job-related emails, minutes of meetings, written reports, business social media presence etc.).	Performance of job duties by you and your colleagues; carrying on the business of the company; monitoring your business social media presence to ensure you comply with standards expected.	Performance of the contract In our legitimate interest to carry out the company business.	Decided on a case by case basis in accordance with the criteria set out in this Notice
Personal data, which may include any of the types of data set out in this Appendix, that is relevant to our strategic decision-making processes, to planning business operations, actual and potential legal claims, corporate reporting and business risk analysis.	To enable us to carry out the company business, analyse current business performance, plan for the future, present information in reports to relevant audiences such as shareholders, protect the company from legal claims, seek professional advice as and when required in the course of running our business.	Legal obligation. Performance of the contract. In our legitimate interest to carry out the company business, including taking strategic decisions in the interest of the business, communicating about the business with relevant audiences and seeking professional advice where appropriate.	Decided on a case by case basis in accordance with the criteria set out in this Notice.

Appendix B: More Information About Your Sensitive Data

TYPE OF SENSITIVE DATA HELD BY US	WHAT WE USE IT FOR	LEGAL GROUND	SENSITIVE CATEGORY LEGAL GROUND	GUIDELINE RETENTION PERIOD
Sickness absence and medical information (including records relating to absence and its management, information about any medical condition and doctor's reports and notes) drug and alcohol testing.	Company and statutory sick pay; providing health insurance and/or managing absence and ensuring appropriate cover; considering how your health affects your ability to do your job and considering adjustments, which may involve us seeking medical advice on this; compliance with health and safety requirements.	Legal obligation. Performance of the contract. In our legitimate interest to manage Employees with health conditions, maintain a safe working environment and to manage sickness absence of our workforce and ensure appropriate cover.	Legal obligation/right in relation to employment. Assessment of working capacity In exceptional circumstances, to protect your or someone else's interests where consent cannot be given.	Decided on a case by case basis in accordance with the criteria set out in this Notice.
Family leave (including maternity, paternity, adoption and shared parental leave, parental leave and time off for dependents) (which could include information about your health, religious beliefs, sexual life or sexual orientation).	Facilitating the taking of family related leave; payment of maternity, paternity, adoption and shared parental pay; managing absences and ensuring appropriate cover.	Legal obligation. Performance of the contract. In our legitimate interest to manage absences and ensure appropriate cover.	Legal obligation/right in relation to employment. Assessment of working capacity.	During employment and up to 6 months after employment ends.
Trade union membership.	Payment of trade union subscriptions via payroll deductions; facilitating meetings with union representatives for collective bargaining purposes; compliance with legal obligations to allow time off for trade union activities, training, etc.	Legal obligation. In our legitimate interest to engage with trade union representatives and manage and facilitate time off, etc. for trade union representatives.	Legal obligation/right in relation to employment.	During employment and up to 6 months after employment end.
Equal opportunities and diversity which could include information about your race or ethnicity, religious beliefs, sexual orientation, or health.	To monitor equality of opportunity and diversity in our organisation, comply with company policies.	In our legitimate interest to understand how our organisation is doing with regard to diversity and equal opportunities.	Public interest in monitoring equal opportunities within the workforce.	During employment and up to 6 months after employment ends.

TYPE OF SENSITIVE DATA HELD BY US	WHAT WE USE IT FOR	LEGAL GROUND	SENSITIVE CATEGORY LEGAL GROUND	GUIDELINE RETENTION PERIOD
Biometric data that is used to identify you, e.g. including finger print laptop security or building entry systems.	To ensure security of laptops/to control access to our premises.	In our legitimate interest to maintain the security of our business premises/equipment.	Your explicit consent (given voluntarily – if you do not consent then alternative means of access to buildings/laptops will be made available). If you do consent, you have the right to withdraw your consent at any time, in which case alternative means of access to buildings/laptops will be made available.	During employment and up to 6 months after employment ends.
Criminal convictions/ offences.	<p>When you are working for us, if a criminal conviction comes to light, to assess and investigate the impact, if any, on your continued employment and the obligations imposed upon the organisation. This is assessed, investigated and acted upon in accordance with the disciplinary policy.</p> <p>If convicted of a criminal offence or suspected of having been involved with such an offence whilst on company premises and or against the company, this information may also be shared with other Casino operators.</p>	<p>Legal obligations.</p> <p>Performance of the contract.</p> <p>In our legitimate interest to determine whether to employ individuals with criminal convictions in particular roles.</p>	<p>You have manifestly made the information public.</p> <p>Establishing, exercising or defending legal claims.</p> <p>Public interest in detecting or preventing unlawful acts.</p>	Decided on a case by case basis in accordance with the criteria set out in this Notice.

Appendix C: More Information About How We Share Your Personal Data

WHO WE SHARE YOUR PERSONAL DATA WITH	WHAT DATA WE SHARE	WHY WE SHARE IT	LEGAL GROUND
IT support provider, payroll provider. Assessment Centres.	Pay, NI and bank details / IT usage details / insert type of data as appropriate for relevant service provider. Name, Job title, email.	To enable the service provider to carry out payroll functions/IT services/ to provide and administer pension and benefits /to operate certification process/ Psychometric assessments, assessments for succession planning, HIPOs, progression.	Performance of contract. In our legitimate interest to engage appropriate service providers to manage payroll/IT, etc. Performance of contract, in our legitimate interest to manage our business.
Our legal and other professional advisers appointed from time to time.	Any of your personal data that is relevant.	To obtain legal or other professional advice about matters related to you or in the course of dealing with legal disputes with you or other Employees; to obtain advice on business management and planning, including accounting advice; to independently audit our accounts.	Legal obligation. Performance of contract. In our legitimate interest to seek professional advice to clarify our rights/obligations and appropriately defend ourselves from potential claims; to manage the business and its finances (In relation to sensitive data – legal obligation/right in relation to employment; defending legal claims.
Occupational health professionals/medical professionals.	Details of your sickness absences, information we already have about your health/medical conditions as relevant.	To seek a medical report about you in accordance with our sickness and absence policy/to carry out assessments required by health and safety legislation.	Legal obligation. In our legitimate interest to manage sickness, absence and health issues arising in our workforce (In relation to sensitive data – Legal obligation/right in relation to employment; assessment of working capacity.) Any other sharing of information may only be performed upon receipt of your explicit consent.
Legal authorities and regulators: HMRC, statistics required by government, i.e. Department of Work and Pensions, Westminster, Gambling Commission, Home Office.	Pay, tax and NI details, name, surname, contractual terms, benefits, job role, DOB.	To comply with regulatory and legal obligations.	Legal obligation. (In relation sensitive data – Legal obligation/right in relation to employment or social security; defending legal claims).

WHO WE SHARE YOUR PERSONAL DATA WITH	WHAT DATA WE SHARE	WHY WE SHARE IT	LEGAL GROUND
Potential purchasers/new service providers.	Any of your personal data that is relevant, anonymity maintained by providing relevant information under unique identifier and not name.	To provide relevant information to prospective purchasers or new service providers in the event of a possible business transfer, a business or share sale, takeover or other corporate transaction.	Legal obligation. In our legitimate interest to consider/proceed with a transfer/sale of the business and information is required by prospective purchasers.
Customers, potential customers, shareholders and interested parties.	Any of your personal data that is relevant, including business contact details, information about role and experience.	Inclusion in corporate reports, for use in business communications, to obtain security clearance to work on customers' premises.	Legal obligation. In our legitimate interest to communicate about the business and our Employees to appropriate audiences, which include customers, potential customers, shareholders and other interested parties.
Third parties at your request.	Employment details as relevant.	At your request, to provide a reference to a potential new employer/details of your employment to a mortgage company.	In our legitimate interest/that of the third-party recipient to action reasonable requests by you to provide your personal data to third parties with your consent.

1. The Employee

If you are the person who wishes to withdraw your consent from Les Ambassadeurs Club Limited, please complete Appendix E (FORM A on page 18).

Key points

- Complete the form as directed.
- If not completed in person, return or send it to the Club WITH evidence of your ID.

2. Acting on Behalf of the Employee

If you are the person who has been given authority to act on behalf of someone, in order to withdraw consent from Les Ambassadeurs Club Limited, please complete Appendix F (FORM B on page 19).

Key points

- Complete the form as directed.
- Return the form with and a letter confirming you have authority to act on their behalf, to the Club.

3. In all circumstances

Return the completed form with supporting documents as follows:

- **In person to:** The Human Resources Team.
- **By post to:**
The Human Resources Team or The Data Protection Officer (DPO),
Les Ambassadeurs Club, 5 Hamilton Place, London, W1J 7ED.
- **By email to:**
 - (a) The Human Resources Team - HR@lesaclub.com
 - (b) The Director of Human Resource - LorindaSchutte@lesaclub.com
 - (c) The Data Protection Officer – DPO@lesaclub.com

Appendix E: Employee Withdrawal of Consent Form A

1. The Employee

Name:

- I, the above-named employee, withdraw my consent to process my personal data, where applicable, for the purposes of as described.
- Please supply evidence of your identity i.e. passport, driving licence, birth certificate and a stamped addressed envelope for returning any documents you provide.
- What have you provided (*please tick the relevant box and provide the document number*):

Passport	<input type="checkbox"/>	
Driving Licence	<input type="checkbox"/>	
Birth Certificate	<input type="checkbox"/>	
National ID card	<input type="checkbox"/>	
Other (<i>please state</i>):	<input type="checkbox"/>	<i>Document:</i> <i>Document number:</i>

Declaration

- Les Ambassadeurs Club Limited no longer have my consent to process my personal data which was based on consent for the purposes of as below listed and in which was previously granted during my employment and ongoing relationship.
- I acknowledge that Les Ambassadeurs Club Limited, in line with the *Employee Privacy Policy* and the *Terms and Conditions of Employment* may store my personal data as far as legally and regulatory required.

Signature:

Date:

Processing Activities:

2. Acting on Behalf of the Employee

2.1. If you are acting on behalf of someone (the Employee), you must have their written authority. If so, please complete the following and enclose the letter of authority.

Name (Data Subject):

Your Name:

2.2. Please describe your relationship with the employee, who leads you to make this request to withdraw their consent with Les Ambassadeurs Club:

Declaration

2.3. Les Ambassadeurs Club Limited no longer have the consent of the above-named employee to process their personal data, where applicable, for the purposes of as below listed, which was previously granted during employment and the ongoing relationship.

2.4. The above-named employee acknowledges that Les Ambassadeurs Club Limited, in line with the *Employee Privacy Policy* and the *Terms and Conditions of Employment* may store their personal data as far as legally and regulatory required.

2.5. I, the above-named person, confirm I have written authority to act on behalf of the above-named employee and attach a Letter of Authority, signed by him/her.

Your Signature:

Date:

Processing Activities:
