



Allstate[®]

ANI Employee & Contractor Data Privacy Notice



Allstate



1. OVERVIEW

This data privacy notice provides information to employees and contractors (also referred to in this notice as "**you**") about how and why Allstate Northern Ireland Limited ('ANI', 'we', 'us', 'our'), and the wider Allstate group collect and use your personal data, and provides information on individuals' rights. It applies to personal data gathered and processed while conducting business, and includes personal data relating to:

- current, past and prospective employees; and
- current, past and prospective contractors (individuals contracted by ANI on a temporary basis to provide services, knowledge or skills).

ANI is the data controller of this data.

Allstate Insurance Company ('AIC') also acts as a data controller. Where AIC is the controller, please see their data privacy notice.

We have appointed a Data Protection Compliance Officer, who is responsible for overseeing use of personal data by ANI. That post is currently held by Sorcha Diver, sorcha.diver@allstate.com. Any questions or concerns about the use of your personal data by ANI and the Allstate group should be referred in the first instance to ANICompliance@allstate.com.

This notice does not form part of any employment or service contracts with ANI and may be amended at any time. This notice was last updated in June 2024.

2. INFORMATION WE COLLECT

ANI collects personal data about employees, contractors and agency workers, either directly from the employee or contractor, or from third parties including service providers, employment agencies, former employers, background check agencies, occupational health providers, employee benefit providers and government departments.

We collect personal information during job-related activities throughout the period of your engagement.



We may collect, store, and use the following categories of personal data about you:

- Personal contact details such as name, addresses, telephone numbers, and personal email address;
- Date of birth, gender, National Insurance number;
- Next of kin and emergency contact information;
- Copy of identification (Passport/driving licence);
- Bank account details;
- Tax status, salary, payroll records, pension information;
- Right to work documentation;
- References and other information included in a CV or cover letter;
- Contract details, start date, job title, working hours, location of workplace;
- Details of any leave including sick leave, holidays, special leave and maternity leave;
- Grievance, disciplinary, dignity at work matters and investigations to which you may be a party or witness;
- Information relating to your performance and training;
- Photographs;
- CCTV footage and other information obtained through electronic means such as swipe card records;
- Information relating to your online activity, including incoming and outgoing electronic communications and internet connections as well as social media presence; and
- Criminal convictions that you declare to us;

We also collect the following special category data:

- Information relating to your health and wellbeing; and
- Information used for equality monitoring.





3. PURPOSES FOR WHICH WE USE YOUR DATA

Your personal data may be processed by ANI (and, where relevant, other Allstate group entities) in order to:

- manage and administer our relationship with you, to provide you access to business services required for your role and to manage our human resources processes;
- perform our employment contract or contract for services with you, or the employment agency or intermediary through whom you are working;
- enable ANI to comply with legal obligations as an employer or service recipient;
- notify you of any disaster or business continuity event, and recovery action;
- comply with health and safety obligations;
- publicise our activities (e.g., group photos of events and site visits, etc.);
- maintain appropriate records of our business communications and transactions;
- monitor and enforce your compliance with ANI policies and procedures;
- conduct information security forensic searches, such as the examination of hardware in the course of company investigations;
- for other personnel, financial, administrative and management purposes relating to your role or the ANI business;
- comply with US discovery requirements (see also [section 7](#));
- protect or enforce legal rights, or for any other purposes permitted or required by law; and
- for other collection, use and disclosure of information with your consent, such as personal data used in the testing of apps.

We may collect and use special category data for the following purposes:

- information about your physical or mental health to make workplace adjustments, to process sick leave or to assess your working capacity as an employee; or
- information about your racial or ethnic origin, religion, sexual orientation or disability to monitor compliance with equal opportunities legislation or keep under review the existence or absence of equality of opportunities;

The above activities may include disclosure or transfer of your data to ANI group entities and other third parties, as set out in [section 7](#).



4. LEGAL BASIS FOR USE OF YOUR DATA

We are required by law to identify the legal basis for processing personal data. The following legal bases apply:


- We collect and use your data when it is necessary for the performance of our employment contract or contract for services with you.
- We collect and use your data when it is in our legitimate interest as an employer or a service recipient, for example, to manage and administer our relationship with you, to manage our human resources processes, or to monitor compliance with ANI policies and procedures;
- We collect and use your data when it is in our legitimate interest as an operating business, such as monitoring the equality of opportunities within the organization, maintaining records of business communications and transactions, monitoring communication systems, completing forensic investigations, and ensuring the security of our premises, IT systems and employees;
- We collect and use your data when it is in our legitimate interest as part of a functioning global organization, for example, when we are required to disclose data to other Allstate group entities to assist with ANI business functions and for the management of the Allstate group.
- We collect and use your data when it is necessary to comply with a legal obligation, such as data collected for statutory payments, taxation and equality reporting.
- We collect and use your information in very limited circumstances with your consent, such as personal data used in the testing of apps or when specifically featured in marketing material.

Where we collect special categories of data (as described in [section 2](#)), we do so when:

- carrying out our obligations and exercising our rights in employment; or
- for the purposes of preventative or occupational medicine and assessing your working capacity as an employee.

5. STORAGE AND RETENTION OF YOUR DATA

Your data may be held within paper-based files, electronic databases and other electronic systems (including our communications systems, such as email), as relevant to the purposes listed above. This may include storage of some data within systems located in another.



We may retain your personal data during our relationship with you as an employee or a contractor, and following termination of the relationship, to the extent the records continue to be relevant for the purposes listed above. The retention period for most employee and contractor data is six years, although some data, in particular financial data, will be retained for seven years.

ANI has in place and shall maintain policies, procedures and technologies which seek to maintain the security of personal data from the point of collection to the point of destruction.

6. AUTOMATED DECISION MAKING

Certain stages of our recruitment process include algorithms that have been designed to automate some recruitment assessment decisions. This includes automation to assist with the shortlisting process for job applicants.


You can ask for us to review the outcome of any automated decisions by submitting a request to ANICompliance@allstate.com

7. SHARING AND TRANSFER OF YOUR DATA

ANI may share or transfer your personal data with/to other members of the Allstate group (including AIC in the US, and Allstate India Private Limited (AIPL) in India) for purposes including the following:

- Financial management of the Allstate group, including decisions about staff salaries.
- Supporting other ANI business functions, such as staff management and performance, monitoring diversity, recruitment, financial management, facilities management, information technology and security, procurement, emergency planning and business continuity.
- Allstate group research and surveys.
- Compliance with US laws and regulations relating to the Allstate group.
- Centralised storage of data managed by Allstate group US entities.
- Other activities relating to management of the Allstate group.

ANI has entered into a data transfer agreement with Allstate Insurance Company and AIPL in relation to these activities, and to provide safeguards relating to the transfer of your personal data, where local laws may not provide the same level of protection for personal data as within the UK.



Note that any of your personal data originating within AIC or another group entity (for example in relation to performance management) may also be shared with ANI.

ANI and Allstate group entities may also share or transfer your personal data with third parties as follows:

- Disclosure of information to legal, governmental or regulatory bodies or agencies (including those in the UK, the US or India), where required by local laws.
- Sharing or transfers of your personal data to third parties as required for legitimate business reasons e.g., travel companies, software vendors or training providers.
- Sharing relevant personal data with benefits providers to service employee benefits.
- Sharing relevant personal data with third-party service providers (known as processors), who hold or use the data on our behalf. This may include storage of data on cloud-based systems.
- Sharing of statistical information with the Equality Commission for Northern Ireland for the purposes of equality reporting. We seek to anonymise this data before it is shared but during further review or auditing by the Equality Commission some personal data may be requested and shared.
- If ANI or a member of the Allstate group is to be sold we may disclose your personal data to the prospective buyer of ANI, a member of the ANI group or such business or assets. If ANI or its assets are acquired by a third party, personal data held by it will be one of the transferred assets.
- Where we have your prior consent to do so.

8. YOUR RIGHTS AND UPDATING YOUR DETAILS

You have certain rights in relation to your personal data, including the right to:

- access a copy of personal data which we hold about you, together with other information about how we process it;
- request the correction of inaccurate personal data and, in some circumstances, to request us to erase or restrict our use of your data, or otherwise to object to our use of your data for reasons relating to your particular situation;
- not to be subject to a decision based solely on automated processing, which significantly affects you;
- receive a copy (in a machine-readable format) of personal data which you have provided to us, where we process it electronically based on your consent or where it is based on the performance of a contract with us;
- make a complaint about how we handle your data to the UK Information Commissioner's Office. Please visit www.ico.org.uk for more information about how to do this; and

- withdraw any consent which you have given relating to use of your data. Note that there are certain limitations and exemptions to these rights which we may apply depending on the circumstances.

If any of your details change (such as your address or contact details), or if you believe any of the data we hold about you is inaccurate, please let your manager or the HR department know, so we can ensure we hold up to date details about you.

Any other requests or queries relating to use of your personal data or your rights outlined above should be made to your manager or the Data Protection Compliance Officer.

9. CONTACT INFORMATION

You may contact the Data Protection Compliance Officer with any queries or complaints relating to the processing of your data by us, to update your details, and to exercise your rights as described above.

The Data Protection Compliance Officer
Allstate Northern Ireland Limited
10 Mays Meadow
Belfast
BT1 3PH
ANICompliance@allstate.com
Registered in Northern Ireland NI034636

If you are still not satisfied with our response, or believe we are not processing your personal data in accordance with the law, you can complain to the Information Commissioner by email: casework@ico.org.uk

Notice updated June 2024.