



Employee Privacy Notice

Employee Privacy Notice

VERSION HISTORY

Version	Date	Author	Approved By	Summary of Changes

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DEFINITION OF ATLAS HOTELS

For the purposes of this notice, references to Atlas Hotels mean Atlas Hotels Limited together with all group companies, subsidiaries and operating entities listed in Appendix A. Where this policy refers to Atlas Hotels, it applies equally to each of those entities unless stated otherwise.

PURPOSE

This notice explains how Atlas Hotels collects, uses, stores, shares and protects personal information relating to employees. It also explains the rights available under UK data protection law and how to raise a question or concern. This is a privacy notice rather than a contractual policy. It does not form part of any contract of employment or contract to provide services. Atlas Hotels may update this notice when processing activities, systems, legal requirements, guidance or business arrangements change.

SCOPE

This notice applies to current and former employees, workers, officers, consultants, contractors, volunteers, casual workers, agency workers and job applicants of Atlas Hotels Group (hereinafter referred to as Atlas Hotels).

This notice applies to personal information processed at hotels, offices, home-working locations and other business locations, and within systems operated by Atlas Hotels or by service providers acting on Atlas Hotels' behalf.



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DATA CONTROLLER

Atlas Hotels Limited is the Data Controller responsible for your personal data.

Registered address: 4 Romulus Court, Leicester, LE19 1YG
Contact email: dataprotection@atlashotels.co.uk

Questions, rights requests or complaints from employees or prospective employees (job applicants) should be directed to dataprotection@atlashotels.co.uk.

DATA PROTECTION PRINCIPLES

Atlas Hotels will process personal information in accordance with the applicable data protection principles. Personal information must be:

- Used lawfully, fairly and transparently
- Collected for specified and legitimate purposes
- Adequate, relevant and limited to what is necessary
- Accurate and kept up to date where required
- Retained for no longer than necessary
- Protected against unauthorised use, loss, damage or disclosure
- Supported by appropriate records demonstrating accountability



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LAWFUL BASIS FOR PROCESSING

We process employee personal data only where permitted under GDPR. The lawful bases we rely on include:

- Contractual necessity – to perform your employment contract
- Legal obligation – to comply with employment, tax, health & safety, and immigration laws
- Legitimate interests – for business operations (e.g. security, performance management)
- Consent – where required (e.g. optional benefits, use of photographs for marketing)
- Explicit consent – for special category biometric data used for payroll and timekeeping purposes. A non-biometric alternative (e.g. PIN) is offered to anyone who does not wish to give, or who withdraws, this consent
- Vital interests – to protect your health or safety in emergencies

PERSONAL INFORMATION WE COLLECT

Atlas Hotels may collect and use the following categories of personal information where relevant:

- Identity and contact information, including name, address, date of birth, contact details, employee number and emergency contacts.
 - Recruitment and employment information, including applications, references, right-to-work evidence, job details, training, qualifications, performance, conduct, grievance and disciplinary records.
 - Pay, benefits and financial information, including bank details, salary, benefits, expenses, pension, tax and National Insurance information.
 - Attendance, leave and wellbeing information, including hours worked, clocking records, leave, sickness absence, adjustments and occupational health information.
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- Systems, devices and communications information, including account identifiers, device records, access logs, security events, internet and system usage information, work communications and support records.
- Physical security information, including CCTV footage, door-access records, key-card information and visitor records.

SPECIAL CATEGORY AND CRIMINAL OFFENCE INFORMATION

Some information receives additional legal protection. This may include health information, biometric identifiers used to uniquely identify a person, equality or diversity information, trade union information and criminal offence information. Atlas Hotels will use this information only where an applicable lawful basis and an additional legal condition apply, with restricted access and additional safeguards.

BIOMETRIC DATA

Up to the end of September 2026, we may collect and process biometric data, such as facial recognition data, to verify your identity and record attendance through our clocking-in system. a non-biometric alternative (a PIN) is always available if you do not wish to provide biometric data or later withdraw your consent. After September 2026, Biometric data will not be collected/processed to identify and record attendance.



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CCTV MONITORING AND SECURITY DATA

Monitoring shall be necessary, proportionate, targeted and transparent, subject to any lawful and limited exception. Please refer to the CCTV Policy for more information.

IT, INTERNET AND COMMUNICATIONS MONITORING

Atlas Hotels' Acceptable Use of Computer Equipment Policy explains acceptable use and how employees will be informed about system monitoring where possible. The Information Security Policy contains requirements for company systems, logging, access and review. A data protection impact assessment shall be completed where new or changed monitoring is likely to result in high risk.

HOW WE USE PERSONAL INFORMATION

Atlas Hotels may use workforce personal information for the following purposes:

- Managing recruitment, onboarding, employment and working relationships.
- Paying wages, expenses, pensions and benefits, and administering tax, National Insurance, tips or service charges.
- Managing working time, attendance, leave, training, performance, conduct, grievances and employee relations.
- Meeting employment, immigration, tax, equality, health and safety, data protection and other legal or regulatory obligations.
- Protecting colleagues, guests, information, systems, buildings and company assets.
- Preventing and investigating fraud, misconduct, security incidents, complaints and legal claims.

SHARING PERSONAL INFORMATION

Atlas Hotels may share workforce personal information where necessary for employment administration, business operations, legal compliance or another lawful purpose.



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Atlas Hotels may share workforce personal information where necessary for employment administration, business operations, legal compliance or another lawful purpose. Recipients may include payroll, pension, benefits, insurance, recruitment, occupational health, HR and IT providers; professional advisers; HMRC; courts; regulators; group companies; hotel owners; franchisors; and business partners where there is a lawful and necessary purpose. Service providers shall be subject to appropriate contractual and security requirements.

INTERNATIONAL TRANSFERS

Where workforce personal information is transferred outside the UK, Atlas Hotels will use a lawful transfer mechanism and appropriate safeguards where required.

DATA RETENTION AND SECURE DISPOSAL

Atlas Hotels retains workforce personal information only for as long as needed for the purpose for which it was collected, including legal, tax, employment, regulatory, security and claims requirements.

Detailed periods are determined by the applicable retention schedule. Information no longer required will be securely deleted, anonymised or destroyed in line with the Hotel Media Storage, Distribution and Destruction Policy and current retention arrangements.



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INFORMATION SECURITY

Atlas Hotels uses appropriate technical and organisational measures designed to protect personal information. Detailed controls are contained in the Information Security Policy, Hotel Personal Data Storage Policy, Acceptable Use of Computer Equipment Policy and related technical standards.

YOUR RIGHTS UNDER GDPR

You have the right to:

- Access your personal data
- Request correction of inaccurate or incomplete data
- Request erasure of your data (where applicable)
- Restrict or object to processing
- Request data portability
- Withdraw consent at any time (where consent is the lawful basis)

Rights are not absolute and legal exemptions may apply. Subject Access Requests received must be handled in line with the Subject Access Request Policy.

Where we rely on your explicit consent to process biometric data for timekeeping, you may withdraw that consent at any time by switching to the non-biometric alternative, without needing to submit a formal request.

Requests should be made to dataprotection@atlashotels.co.uk. We may require proof of identity before responding.



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DATA BREACHES

Actual or suspected loss, disclosure, alteration, destruction or unauthorised access involving personal information must be reported immediately through the current Atlas Hotels data incident reporting route. Assessment, containment, escalation and any required notification will be handled under the Data Incident Management or Personal Data Breach procedure and Information Security incident arrangements.

COMPLAINTS

Questions or concerns should be raised to dataprotection@atlashotels.co.uk. Individuals also have the right to complain to the Information Commissioner's Office (UK) or Local Supervisory Authority (EU). Atlas Hotels encourages concerns to be raised internally first, but this does not remove the right to contact the regulator.

RELATED POLICIES AND RESPONSIBILITIES

This notice should be read alongside the Atlas Hotels policies and procedures when relevant, including:

- CCTV Policy
 - Information Security Policy
 - Acceptable Use of Computer Equipment Policy
 - Hotel Operations Data Protection Policy
 - Subject Access Request Policy for Hotel Teams
 - Data Incident Management or Personal Data Breach procedure
 - Data Retention and Disposal Schedule or Policy
 - Hotel Media Storage, Distribution and Destruction Policy
 - Hotel Personal Data Storage Policy
 - Service Providers Access Policy and Procedures
 - Disciplinary and Dismissal Policy
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Appendix A: List of relevant entities

Atlas Hotels Limited
Atlas Hotels (Trading) Limited
Atlas (Edinburgh City West) Limited
Atlas Hotels (Bicester) Limited
Atlas2 Hotels (Trading) Limited
Bettagrade Limited
Chardon Edinburgh (RM) Limited
Chardon Leisure Limited
Dunfermline Express Hotel Limited
Ingliston Hotels Limited
Atlas4 Hotels Limited