

Worker privacy notice: a template to adapt

A notice for **the customer** to give its workers about the TeamTalk service. The customer is the controller of this data and this duty is the customer's, not TeamTalk's. This template exists to make it a twenty-minute job instead of a three-week one.

HOW TO USE THIS, AND ONE THING NOT TO DO

Replace every **[bracket]** with your own organisation's details and delete anything that is not true of your deployment. This is your notice, published under your name, and it must describe what you actually do. Do not publish it with TeamTalk's name in the controller box: TeamTalk is your processor, not the controller of your workers' data. Give it to workers **before** the first post goes out, not after, and put it where they will actually find it: on the join card, on the welfare cabin noticeboard, and in the app.

1. Who is responsible for your information

Controller	[Customer legal name] , company number [number] , registered office [address] . We decide why and how your information is used, so we are responsible for it.
Who to ask	[name, role] · [email] · [telephone] . [Our data protection officer is [name], [email]. Delete this if you do not have one.]
Our supplier	We use TeamTalk , supplied by [TeamTalk Ltd] , to send you notices and record that you have seen them. TeamTalk acts only on our written instructions, under a data processing agreement, and cannot use your information for its own purposes.

2. What TeamTalk holds about you, and why

WHAT	WHY	OUR LAWFUL BASIS
Your name, mobile number, site or team, employer or subcontractor, job or trade, start and leaving date , and the language you choose	So we can reach you, put you in the right group, and send notices in a language you can read	Legal obligation where the notice discharges a duty to inform or instruct you about health and safety, and legitimate interests in running the site otherwise. [If a worker is your employee, employment contract may also apply.]
The posts, comments and messages sent to you or by you, and their translations	So the notice reaches you in your language and you can ask a question about it	As above
A record that you signed in , and that you confirmed a must-read notice, each with a date and time	So we know the message reached the people it had to reach, and so we can chase the people it did not	Legal obligation and legitimate interests . See section 3: this is monitoring and we treat it as such
Hazard reports you send, including any photograph	So a hazard gets to the person who can fix it	Legal obligation under health and safety law, and legitimate interests
Technical records: device and browser type, IP address, notification tokens	To keep the service working and secure	Legitimate interests in a secure, working service

Sensitive information. The service is not designed for sensitive information about you, such as health, religion, ethnicity or trade union membership, and we do not ask for it. It could appear by accident in the text of a notice, for example an accident notice or a canteen notice about dietary or religious requirements. Where that happens we are responsible for handling it lawfully, and the same security measures apply to everything in the system without distinction. **We will not use the service for anything about criminal convictions or offences.**

3. The confirmation records are monitoring, and here is why they are proportionate

Recording that a named person signed in and confirmed a named notice, and producing a list of the people who have not, is **monitoring of workers** under the Information Commissioner's employment practices guidance. We are telling you that plainly rather than leaving you to work it out.

Why we do it. We have a legal duty to make sure you are told about the risks on this site in a way you can understand. Before this, "we told everyone" meant a signature on a sheet that a supervisor collected, or a message in a group chat that we could not see the reach of. The confirmation record is how we know a notice actually reached the people it had to reach, so we can go back to the ones it did not.

Why it is no more than necessary. We considered doing nothing and relying on the old paper sheet, which does not tell us who was missed; and we considered more intrusive options, which we rejected. What we record is **the fact and the time of a confirmation, and nothing else**. It is used to chase a missed notice, not to assess your performance. It is kept for the period in section 5 and then deleted. The chase list is seen by [\[the site manager and the HSEQ lead\]](#) and no one else.

What we do not do, and what the system cannot do. There is **no location tracking**: the app does not record where you are. There is **no content analysis**: nobody reads your messages looking for keywords, sentiment or anything else. There is **no productivity scoring**: confirmation records are not used to rank, rate or compare workers, and they are not used in performance management or disciplinary decisions [\[state your position here plainly, and stand by it\]](#).

A confirmation is not a test. Confirming a notice records that you received it. It does not record that you understood it, and it does not remove your right to ask. **If a notice is unclear, ask.** Nobody will be criticised for asking about a safety notice.

[\[If you recognise a trade union, add: we discussed the introduction of this with \[union\] on \[date\] and their comments are recorded in our assessment.\]](#)

4. Who else sees it

Inside our organisation: [\[your managers, your site manager, the HSEQ team and the administrators who run the system\]](#). Outside: **TeamTalk** as our supplier, and the small number of suppliers TeamTalk uses to run the service, which are listed at [\[https://team-comms.com/sub-processors\]](https://team-comms.com/sub-processors). Your information is **stored in the United Kingdom**. A small number of those suppliers are in the United States, for sending the sign-in text message, for video, and for translating the text of a notice. **Post text, comment text, direct message text and hazard report text are sent for translation. No names, phone numbers or identifiers accompany the text.** Each of those transfers is made under a route the law allows and we can tell you which. We will also share information where the law or a regulator requires it, or to investigate an accident.

5. How long it is kept

WHAT	HOW LONG
Notices, comments and your confirmation records	[24] months after the end of our relationship with the supplier
Your account	Switched off on your leaving date. Your name and number are removed [12] months after that
Hazard reports and photographs	[24] months
Technical logs	[90] days

[\[If you keep briefing records longer for insurance or limitation reasons, say so here and say why. Do not leave a longer period undeclared.\]](#)

6. Your rights

You can ask us for a **copy** of what we hold about you; to **correct** anything wrong; to **delete** it, though we may need to keep a briefing record where the law requires us to; to **restrict** what we do with it while a question is resolved; and to **object** to us using it where we rely on legitimate interests, including objecting to the monitoring described in section 3. We will consider any objection properly and tell you the outcome in writing. There is **no automated decision-making** here: no decision about you is made by a computer without a person involved.

Ask [\[name\]](#) at [\[email\]](#) or [\[telephone\]](#). We reply **within one month** and it is free. **You will never be treated badly for asking.**

If you are not happy with our answer you can complain to the **Information Commissioner's Office**, helpline **0303 123 1113**, ico.org.uk/make-a-complaint.

Short form for the join card and for translation · ENGLISH ONLY · 221 WORDS, UNDER THE 250-WORD LIMIT

This is the section to translate into the languages on your site. Keep it to this length. Give the long notice to anyone who asks for it.

Your information and this app

[Employer name] is responsible for your information. We use an app called TeamTalk to send you work notices in your own language and to record that you have seen them.

We hold your name, mobile number, site, employer, job, start and leaving dates, and the language you choose. We hold the notices sent to you, anything you write back, and hazard reports you send. We hold a record that you signed in and that you confirmed a must-read notice, with the date and time.

We do this because we must tell you about the risks on this site in a way you understand, and we must know the message reached you.

The record of who confirmed a notice is a form of monitoring. We use it only to chase people a notice did not reach. **There is no location tracking. Nobody reads your messages looking for anything. It is not used to score your work.**

Confirming a notice means you got it. It does not mean you understood it. **If a notice is not clear, ask. Nobody will mind.**

Your information is stored in the United Kingdom and kept for [24] months.

You can ask to see it, correct it, delete it or object. Ask [name] on [number]. You will never be treated badly for asking.

This is a template, not legal advice, and it is not TeamTalk's notice. The customer is the controller and publishes it in its own name. Adapt it to what you actually do, and have your own adviser read it if your arrangements differ from the ones described. **Sources, verified 28 August 2026.** UK GDPR Article 13 legislation.gov.uk/eur/2016/679/article/13; Article 6(1)(c) and (f); Article 9 (special categories) and Article 10 (criminal convictions and offences), which are separate regimes legislation.gov.uk/eur/2016/679/article/10; Articles 15 to 22 (rights) and Article 12(3) (one month to respond); ICO, *Employment practices and data protection: monitoring workers*, in particular "What must we tell workers about our monitoring?", "How do we ensure we are transparent about monitoring?" and "Should we discuss the introduction of monitoring with our workers?" ico.org.uk/monitoring-workers; Health and Safety at Work etc. Act 1974 s.2(2)(c), the duty to provide information, instruction, training and supervision legislation.gov.uk/ukpga/1974/37/section/2.