

Privacy Notice for the HR System (Hark)

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1 General information

This privacy notice tells you about the personal data held and processed by the Strategic Investment Board Ltd (SIB) in connection with the Hark HR system. It explains how SIB uses personal data in Hark and the ways in which SIB protects privacy.

Hark is a Human Resource Information System used to support HR administration, employee records, HR workflows, absence management, performance-related processes, training records, compliance activities and authorised management access. The Hark system is provided by Hallmark Solutions Limited.

This privacy notice takes account of the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and guidance from the Information Commissioner's Office (ICO). More information about privacy rights is available from the ICO website: <https://ico.org.uk/for-the-public/>.

The Strategic Investment Board Ltd is the data controller for the personal data processed in Hark, unless otherwise stated. Hallmark Solutions Limited acts as a supplier/service provider for the Hark system.

2 What data do we collect?

SIB may collect and hold the following categories of personal data in Hark, where relevant to your employment, role, management responsibilities or authorised use of the system:

- Basic identity details, such as name, title, initials, staff or employee number and salutation.
- Contact details, such as work email address, personal email address, telephone numbers, home address and postcode.
- Employment details, such as job title, line manager, employment status, start date, end date and length of service.
- Contract details, such as contract type, contract basis, hours of work, shift pattern, contract status and contract revision information.
- Absence, annual leave and time-off information, such as absence records, absence reasons (ie sickness, bereavement, maternity, etc), leave requests, planned leave, leave adjustments, annual leave entitlement and balances.
- Payroll and payment-related information, where held in Hark or used through integrations, such as payroll indicators, salary details, pay rate, payroll period, payment method and bank details.
- Performance, training and compliance information, where this is recorded in Hark.
- Emergency contact and next-of-kin details, such as name, relationship, telephone numbers and any supporting consent records where used.

- System administration information, such as user roles, access permissions, workflow actions, audit logs and security records.
- Information required for business continuity, emergency planning, reporting, audit, governance or legal compliance where processed through Hark.

In connection with some of the above, SIB may also process special category or sensitive personal data. This may include health-related absence information, disability information, equality monitoring information, racial or ethnic origin, religious or other beliefs of a similar nature, political opinion, sexual orientation, trade union membership, disciplinary information or other information requiring additional protection under data protection law, where relevant and lawful.

Job applications and recruitment: SIB's general privacy notice refers to information and other details used to support recruitment, including successful and unsuccessful candidates and contact details for referees provided by candidates. SIB uses 'Get Got' and Hark to record and manage job application information, Hark may also contain recruitment information such as contact details, application information, CVs, interview notes, assessment records, referee details and pre-employment check information.

3 How do we collect your data?

SIB may obtain personal data for Hark directly from individuals or, where appropriate, from other sources. This may include:

- Information provided directly by employees, managers or authorised users.
- Information entered into Hark by HR, managers, system administrators or other authorised staff.
- Information already held by SIB as your employer or as part of HR administration.
- Information transferred from, or shared with, payroll, absence-management or other HR-related systems where integrations are enabled.
- Information generated by the system, such as workflow actions, audit records, leave calculations and access logs.

4 Use of website cookies

This privacy notice relates specifically to the Hark HR system. SIB may use cookies on its websites. More information is available in SIB's cookie policy at:

<https://sibni.org/site-pages/cookie-policy/>

If Hark uses cookies or similar technologies for authentication, security, session management or system functionality, these will be used only where necessary or otherwise in accordance with applicable requirements.

5 How will we use your data?

SIB collects and processes personal data in Hark for the following purposes:

- To support and manage employees, workers, managers and authorised users.
- To maintain accurate HR records, employee records, contract details and contact details.
- To administer absence, annual leave, time off, leave balances and attendance-related records.
- To support line management responsibilities and HR workflows.
- To administer payroll-related processes and workforce administration where Hark data is used for those purposes.
- To support performance, training, compliance, governance and internal reporting processes where these are managed through Hark.
- To maintain accounts and records and meet SIB's legal, audit, statutory, governance and public-function requirements.
- To support detection and investigation of suspected or actual fraud, loss or crime, where required by law or appropriate for public accountability.
- To manage user access, authentication, cyber security, audit logs and system support.
- To enable Hallmark Solutions Limited and approved suppliers to provide hosting, maintenance, technical support and system services.
- To support recruitment and pre-employment processes only where SIB uses Hark for job applications or recruitment records.

SIB will only collect and hold the minimum amount of personal data necessary for the relevant purpose. Access to information in Hark should be role-based so that users can only access information needed for their role.

The lawful bases SIB may rely on include public task, legal obligation, performance of contract, legitimate interests where applicable, and consent where processing is genuinely optional. For special category data, SIB will rely on an appropriate UK GDPR Article 9 condition, such as employment, social security and social protection law, substantial public interest, explicit consent where required, or another lawful condition relevant to the processing.

Hark may support system-generated calculations and workflow actions, such as leave entitlement calculations. SIB does not use Hark to make decisions based solely on automated processing that have legal or similarly significant effects on individuals unless this is separately explained to the individuals affected.

6 How do we store your data?

Personal data processed in Hark is stored electronically. Hark is a cloud-based HR system provided by Hallmark Solutions Limited. Hark is hosted using AWS services and that data is hosted in the UK or European Economic Area (EEA), with international transfers, if applicable, governed by appropriate contractual safeguards.

Hark uses technical and organisational security measures including role-based access control, secure authentication, encrypted data transmission, audit logs, backups, disaster recovery arrangements and cloud security controls. Hallmark Solutions Limited holds certification to BS EN ISO/IEC 27001:2022 for the development, maintenance and support of HR software and services.

If it becomes necessary to transfer personal data outside the UK or EEA, SIB will ensure that the transfer is made in accordance with data protection legislation and appropriate safeguards.

7 How long do we keep your data?

SIB complies with the storage limitation principle and keeps personal data only for as long as it is needed for the relevant purpose and in line with its [Retention and Disposal Schedule](#). When personal data is no longer required, it will be securely deleted, destroyed or archived where appropriate.

The Hark supplier DPIA states that data is retained for the duration of the client contract and, on termination, is deleted or returned to the client subject to agreed terms. The Hark technical documentation states that database backups are taken daily in AWS RDS with a 7-day retention period.

Specific retention periods for records in Hark should be read alongside SIB's Retention and Disposal Schedule. This may include retention periods for HR records, payroll records, absence records, performance records, recruitment records where applicable, equality monitoring records, audit logs and system administration records.

8 Will we share your data?

SIB shares personal information only when it is fair, lawful and appropriate to do so. This may include sharing personal data where necessary to meet SIB's legislative, public-function, employment, payroll, HR administration, audit, legal, fraud prevention, crime prevention, security, emergency planning or vital interests requirements.

SIB may share personal data processed through Hark with the following categories of recipient where relevant:

- Hallmark Solutions Limited, as the Hark system supplier and support provider.

- HR, payroll, occupational health, training, IT, hosting, security, audit or professional service providers.
- Government Departments or public bodies where required or appropriate.
- Current, past and prospective employers, employment and recruitment agencies, referees or pre-employment checking providers where relevant to recruitment or employment administration.
- Financial organisations where required for payroll or related administration.
- Courts, tribunals, legal advisers and parties to litigation where required.
- Police forces, regulators, auditors, emergency responders or other bodies where required by law or necessary for public function, crime prevention, security or vital interests.

Where Hark integrates with other systems, such as payroll, relevant employee, absence, leave, contract or new-start/leaver information may be shared through those integrations where enabled and authorised.

9 What are your data protection rights?

SIB would like to make sure you are fully aware of all your data protection rights. You can find detailed information about your rights at the ICO website (<https://ico.org.uk/for-the-public/>). Everyone has the following rights:

9.1 YOUR RIGHT OF ACCESS

You have the right to ask us for copies of your personal data. There are some exemptions, which means you may not always receive all the information we process.

9.2 YOUR RIGHT TO RECTIFICATION

You have the right to ask us to correct information you believe is inaccurate. You also have the right to ask us to complete information you believe is incomplete.

9.3 YOUR RIGHT TO ERASURE

You have the right to ask us to erase your personal data under certain conditions.

9.4 YOUR RIGHT TO RESTRICTION OF PROCESSING

You have the right to ask us to restrict the processing of your information under certain conditions.

9.5 YOUR RIGHT TO OBJECT TO PROCESSING

You have the right to object to SIB's processing of your personal data, under certain conditions.

You have the absolute right to object to direct marketing.

9.6 YOUR RIGHT TO DATA PORTABILITY

You have the right to ask that we transfer the data that we have collected to another organization, or directly to you, under certain conditions.

10 How do I request my personal data?

SIB tries to be as open as possible in terms of giving you access to your own personal data. As an employee/user of the Hark system, you will have access to see some of your own personal data, with the ability to amend certain details, including contact information. However, you can request your employee record by making a Subject Access Request. SIB will provide as much information as possible, but please be aware some exemptions may apply and you will be notified if this is the case.

To make a Subject Access Request, please submit your request in writing:

By email: contact@sibni.org

By post: Data Protection Officer
Strategic Investment Board
The Kelvin
17-25 College Square East
Belfast
BT1 6DE

Please provide as much detail as possible to help us locate the information you are requesting.

You are not required to pay any charge for exercising your rights. We have one month to respond to you.

11 How to contact us

The Strategic Investment Board is the data controller for the personal data we process, unless otherwise stated.

SIB's Data Protection Officer is Angelina McGilly.

You can contact us:

By email: contact@sibni.org

By post: Strategic Investment Board
The Kelvin
17-25 College Square East
Belfast
BT1 6DE

By telephone: 028 9025 0900

12 Your right to complain

If you are not satisfied with SIB's response to your request or inquiry or if you believe SIB is not processing your personal data in accordance with the law, you can complain to the Information Commissioner.

SIB is registered with the Information Commissioner's Office under reference Z9763303.

You can contact them via:

Post: Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline: 0303 123 1113

Website: <https://ico.org.uk/make-a-complaint/>

13 Changes to this Privacy Notice

SIB keeps its privacy notice under regular review. The most recent update was 21 July 2026.