

AMENDMENT RECORD

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|--------------|-------------|----------------------------|
| 1 | 18.05.2018 | First issue. |

Employee Privacy Notice

This Employee Privacy Notice, which includes guidelines on Data Retention, sets out what information about you (your personal data) that we, the Severn Glocon Group PLC and its subsidiaries, hold 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, workers, contractors, agency workers, consultants, work experience and directors (together referred to as 'employees' or 'you').

We are required by data protection law to give you the information in this Privacy Notice. It is important that you read the Privacy Notice carefully, together with any other similar information that we might give you from time to time about how we collect and use your personal data. You should also read our Data Protection Policy 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 in the course of your work.

This Privacy Notice applies from 25th May 2018, when the General Data Protection Regulation comes 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 Privacy Notice at any time.

Who is the data controller?

The Severn Glocon Group PLC and all subsidiary companies, is the "data controller" for the purposes of data protection law. This means that we are responsible for deciding how we hold and use personal data about you. Each subsidiary company has a nominated data protection contact who reports to the Group Data Protection Lead.

What type of personal data do we hold about you?

Personal data means any information relating to a natural person who can be identified (directly or indirectly) in particular by reference to an identifier (e.g. name, NI number, employee number, email address, 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; health and safety; CCTV footage; business equipment, technology and systems usage information, etc.

Data protection law divides personal data into two categories: ordinary personal data and special category 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 **special category data**. (The rest is **ordinary personal data**).

We hold and use various types of special category data about you, including: sickness absence and medical information; details of family leave which could include information about your health, 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.

Why do we hold your personal data and on what legal grounds?

We hold and use this 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). 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 such as the obligation: 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 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 special category 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.

Since special category data is usually more sensitive than ordinary personal data, we need to have an additional legal ground 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 special category data:

- Where we need to exercise our legal rights or carry out our legal obligations in relation to employment or social security law and the processing is in line with our Employee Data Protection Policy (**legal obligation in relation to employment law**)
- Where it is needed in the public interest, such as for equal opportunities monitoring, and in line with our Employee 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 special category 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 Privacy Notice sets out in more detail the types of ordinary and special category personal 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.

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, during email correspondence or 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, 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; we

might seek advice from a professional adviser that includes information about you; or your TU representative might correspond with us in particular situations.

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 will issue a separate privacy notice where applicable.

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 Privacy Notice.

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 particular 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 overtime 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 particular implications of any such decision at the relevant time.

Solely automated decision-making

Solely automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We do not envisage that any decisions will be taken about you using solely automated means, however we will notify you in writing if this position changes

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 your nominated data protection contact 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.

Data Retention Guidelines

These guidelines explain how long we keep information about you (personal data), both while you are working for us and after you have left.

How do we decide how long to keep your personal data?

We take into account 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 particular 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**

Guideline Retention Periods

The Appendix below sets out guideline retention periods for different categories of Employees' personal data. However, for some categories of personal data, it is more appropriate to decide retention periods on a case by case basis, using the criteria described above, and this is indicated in the table where applicable.

In addition, there may be circumstances in which it is appropriate to depart from the guideline retention periods set out in the table, and instead decide to keep a particular item of personal data for a longer or shorter period than that set out in the table. Such decisions will be based on relevant circumstances, taking into account the criteria listed above. In particular, we will always keep personal data if required to do so under legal, reporting or regulatory requirements.

In some circumstances, we may anonymise your personal data so that it can no longer be associated with you, in which case the data will no longer be considered personal data and these guidelines will not apply. You should also read our Employee Data Protection Policy, which summarises our legal obligations when processing your personal data, as well as your own obligations in relation to any personal data that you handle in the course of your work. A copy of the Employee Data Protection Policy is available on the Company Website.

If you have any questions or concerns about how your personal data is being used by the Severn Glocon Group PLC and its subsidiaries, you can contact your nominated data protection contact in the first instance or alternatively the Group Data Protection Lead. Alternatively you can email: gdpr@severnglocon.co.uk

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>

APPENDIX – FURTHER DETAILS

This section of the Privacy 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 special category personal 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.

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 (name, title, contact details, DOB, gender, photograph, passport, signature) | Administration of the contract, your contact details in case of site closure, gender for potential gender pay gap reporting, DOB for pensions, redundancy calculations, death in service benefit entitlement, eye tests, photograph for ID badges and on intranet/web to help colleagues / customers / security to identify you, passport and signature for identification purposes. | Performance of the contract It is our legitimate interest to use photographs to help colleagues / customers / security 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 CV, applications, correspondence to | Administration of the contract, and to check and demonstrate that you have the legal right to work in the UK | Legal obligation Performance of the contract | 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 |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| candidates and agencies, references, right to work checks, personal email and/or personal phone numbers and related documents such as passport, driving licence, birth certificate) | | In our legitimate interest to maintain relevant and appropriate records of recruitment for business administration and administration of your employment | Right to work checks - two years after employment ends |
| Employment details (start date, contractual terms, visa requirements, location, job title, career history with us) | Administration of the contract Managing our relationship with you on an ongoing basis. Details about role/experience, etc. may be used in communications with customers and potential customers | Legal obligation Performance of the contract In our legitimate interest to manage our ongoing relationship and to promote our goods/services to customers and potential customers | During employment and up to 6 years after employment ends |
| Payroll, tax/NI and bank details (P45 from previous employer, Court Order deductions at source etc.) | Paying you, deducting tax and NI and/or 3 rd party statutory deductions 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 |
| Working hours and arrangements (time and attendance system, employee clock number, overtime sheets, service work) | Paying you correctly Complying with legal requirements regarding working time 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 |

| Type of ordinary personal data held by us | What we use it for | Legal ground | Guideline Retention Period |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------|
| Pay and benefits (pension contributions, expenses and death in service) | 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 | 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 |
| Performance and career progression (employee reviews, performance management, target/objective setting, consideration of new duties/roles, skills matrix) | Ensuring you perform in accordance with your contract and to the standards we require, and considering future duties/roles | In our legitimate interest to manage performance and duties/roles to ensure effective business operations | During employment and up to 6 months after employment ends |
| Qualifications and Training (educational, vocational, driving licences where appropriate) | 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 i.e. jury service, reservist. | Legal obligation Performance of contract In our legitimate interest to ensure leave taken is compatible with our business | 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 |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | requirements and that any consequent operational adjustments are made | |
| Disciplinary, conduct and grievance matters about you or involving you (may include you providing a witness statement or details gained during an investigation about you and/or a 3 rd party) | 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 6 months after employment ends |
| Health and Safety (accident reports, RIDDOR reporting, health screening i.e. audiometry, skin, lung and/or eye tests, First Aider names and contact details, on-site vehicle registration details) | Conducting risk assessments; establishing safety measures to mitigate identified risks; providing a safe working environment, keeping mandatory records for insurance purposes First Aider names and work contact details for onsite emergencies. On-site vehicle registration numbers for site security, eligibility to perform duties as a company driver, vehicle hire | 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 Privacy Notice, in particular any legal requirement to retain particular records |

| Type of ordinary personal data held by us | What we use it for | Legal ground | Guideline Retention Period |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------|
| 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 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 |
| CCTV footage | Primarily for security purposes, although we may also use CCTV footage when investigating allegations of misconduct by Employees | In our legitimate interest to deal effectively with allegations of misconduct and to maintain the security of our premises | In accordance with individual site retention period. Normally 28 days from when data recording images were captured |
| Information about your use of business equipment and systems including our computers / telephones / mobile phones / door entry systems / clocking in and out systems /time recording/performance output monitoring (i.e. shop floor performance data) | 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; 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 record time worked and rate/efficiency of work | During employment and up to 6 years after employment ends |

What we use your special category data for

| Type of special category data held by us | What we use it for | Legal ground | Special category legal ground | Guideline Retention Period |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|
| Sickness absence and medical information (including records relating to absence and its management, information about any medical condition (including flu jabs, fit notes, GP or Consultant names & address, medical and hospital certificates or appointments, absence related emails and doctor's reports and notes, voicemails left by employee regarding absence) | Payment of company and statutory sick pay; 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 in relation to employment law Assessment of working capacity In exceptional circumstances, to protect your or someone else's interests where you cannot give consent | Decided on a case by case basis in accordance with the criteria set out in this Privacy 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 in relation to employment law Assessment of working capacity | During employment and up to 6 years after employment ends |

| Type of special category data held by us | What we use it for | Legal ground | Special category legal ground | Guideline Retention Period |
|------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|
| 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 in relation to employment law | During employment and up to 6 years after employment ends |
| Criminal convictions/offences | When you are working for us, if a criminal conviction comes to light, to investigate and assess the impact, if any, on your continued employment (see Disciplinary policy) | Legal obligations Performance of the contract In our legitimate interest to determine whether to employ individuals with criminal convictions in particular roles | You have manifestly made the information public Establishing, exercising or defending legal claims | Decided on a case by case basis in accordance with the criteria set out in this Privacy Notice |

Who we share your personal data with

| Who we share your personal data with | What data we share | Why we share it | Legal Ground |
|------------------------------------------------------|--------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|
| Severn Glocon Group PLC and its subsidiary companies | Any personal data that we hold on you as detailed in the privacy notice. | To make business decisions connected with your career and pay and benefits, such as inclusion in the group-wide bonus scheme To manage the company's or | Legal obligation Performance of the contract In our legitimate interest to manage the business and Employee |

| Who we share your personal data with | What data we share | Why we share it | Legal Ground |
|-------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | group's business To monitor company performance To provide system maintenance support and hosting of data | performance |
| External IT Provider | Any personal data that we hold on you as detailed in the privacy notice. IT usage details | To enable the service provider to carry out IT services and to operate certification process. | Performance of contract In our legitimate interest to engage appropriate service providers to manage IT |
| Independent Financial Advisor | Any personal data that we hold on you as detailed in the privacy notice i.e. DOB, Pay | To enable the service provider to provide and administer pension | Performance of contract In our legitimate interest to engage appropriate service providers to manage pensions |
| Healthcare Provider | Any personal data that we hold on you as detailed in the privacy notice (normally submitted by individual on application form). | To enable the service provider to provide and administer a Healthcare cash benefit plan | Performance of contract In our legitimate interest to engage appropriate service providers to manage the Healthcare benefit scheme |
| Our legal and other professional advisers appointed from time to time i.e. EEF; external training providers | Any personal data that we hold on you as detailed in the privacy notice. | 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 special category data – legal obligations in relation to |

| Who we share your personal data with | What data we share | Why we share it | Legal Ground |
|---------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | | employment law; 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 special category data – Legal obligation in relation to employment law; assessment of working capacity |
| HMRC Government Agencies | Pay, tax and NI details | To comply with regulatory and legal obligations | Legal obligation (In relation to special category data – legal obligations in relation to employment or social security law; defending legal claims) |
| Customers, potential customers, shareholders and interested parties | Business contact details, information about role and experience. | Relevant employees' personal data will be included in corporate reports as required Business contact details and information about role/experience of key team members, etc. may be used in communications i.e. organisation charts; Details required to obtain security clearance to work on a customer's premises will be shared as appropriate | 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 (i.e. mortgage, rental) | Employment details as relevant | At your request, to provide a reference to a potential new employer/details of your employment to a mortgage or rental company | In our legitimate interest to action reasonable requests by you to provide your personal data to third parties |

Transferring personal data outside the EEA

We do not believe we transfer your personal data outside the EEA.