



27.0 STAFF PRIVACY POLICY

27.1 GENERAL

27.1.1 RPP Limited together with any group companies ("we" "us" "our") are committed to protecting and respecting the privacy and security of your personal data. This policy applies to prospective, current and former employees, consultants, directors, secondees, casual workers, agency workers, volunteers and individuals on work experience ("Staff").

27.1.2 The policy describes the categories of personal data that we collect, how we use your personal data, how we secure your personal data, when we may disclose your personal data to third parties, and when we may transfer your personal data outside of the European Economic Area. This Privacy Policy also describes your rights regarding the personal data that we hold about you and how you can access, correct, and request erasure of your personal data. We will only process your personal data in accordance with this policy unless otherwise required by applicable law. We take steps to ensure that the personal data that we collect about you is adequate, relevant, not excessive, and processed for limited purposes.

27.2 COLLECTION AND USE OF PERSONAL DATA

27.2.1 FOR THE PURPOSES OF THIS PRIVACY POLICY, PERSONAL DATA MEANS ANY INFORMATION ABOUT AN IDENTIFIABLE INDIVIDUAL. PERSONAL DATA EXCLUDES ANONYMOUS OR DE-IDENTIFIED DATA THAT IS NOT ASSOCIATED WITH A PARTICULAR INDIVIDUAL. TO CARRY OUT OUR ACTIVITIES AND OBLIGATIONS AS AN EMPLOYER, WE MAY COLLECT, STORE, AND PROCESS THE FOLLOWING CATEGORIES OF PERSONAL DATA, WHICH ARE REQUIRED FOR US TO ADMINISTER OUR RELATIONSHIP (WHETHER AS EMPLOYER, PROSPECTIVE EMPLOYER OR OTHERWISE) WITH YOU:

- a) personal contact details such as name, title, addresses, telephone numbers, and personal email addresses;
- b) date of birth;
- c) equal opportunities monitoring information;
- d) emergency contact information;
- e) details about dependants;
- f) government identification numbers such national insurance number, driver's license number or other identification card number;
- g) bank account details and payroll information;
- h) wage and benefit information;
- i) performance information, including but not limited to appraisal documentation, performance management information;
- j) pension enrolment information;
- k) start date and job title;
- l) education and training records;
- m) disciplinary and grievance records;
- n) employment records (including professional memberships, references, work history, and proof of work eligibility); and
- o) other personal details included in an application form, C.V or other information that you otherwise voluntarily provide to us.



27.2 USE OF PERSONAL DATA

27.3.1 We only process your personal data where applicable law permits or requires it, for example, where the processing is necessary for the performance of our employment contract with you, or where the processing is necessary to comply with a legal obligation that applies to us as your employer. We may process your personal data for the following legitimate business purposes:

- a) employee administration (including payroll and benefits administration);
- b) business management and planning;
- c) processing employee work-related claims (for example, insurance claims);
- d) accounting and auditing;
- e) conducting performance reviews and determining performance requirements;
- f) absence monitoring;
- g) assessing qualifications for a particular job or task;
- h) carrying out investigations into potential disciplinary or grievance matters;
- i) complying with applicable law;
- j) education, training, and development requirements; and
- k) complying with health and safety obligations.

27.3.2 We will only process your personal data for the purposes for which we collected it. If we need to process your personal data for an unrelated purpose, we will provide notice to you and, if required by law, seek your consent. We may process your personal data without your knowledge or consent where required by applicable law or regulation.

27.3.3 We may also process your personal data for our own legitimate interests, including for the following purposes:

- a) to prevent fraud;
- b) to ensure employees have the right to work in the UK;
- c) to ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution;
- d) for monitoring of employees and assessing compliance with our policies and procedures; and
- e) to support internal administration with our affiliated entities.

27.3.4 You will not be subject to decisions based on automated data processing without your prior consent.

27.4 COLLECTION AND USE OF SENSITIVE PERSONAL DATA

27.4.1 Certain categories of personal data may be considered sensitive and may receive special protection including personal data relating to race or ethnic origin, political opinions, religious, philosophical, or moral beliefs, trade union membership, social welfare, sexual life, or sexual orientation, physical or mental health or condition, Unlawful or objectionable conduct, criminal charges, or convictions, biometric information and genetic data.

27.4.2 We may collect and process sensitive personal data where it is necessary for the purposes of performing or exercising our obligations or rights under employment law, for health purposes,



in relation to equality of opportunity of treatment and for preventing or detecting unlawful acts and in relation to the following categories of sensitive personal data in particular:

- 27.4.2.1 trade union membership information in order to comply with employment law and industrial relations obligations.
- 27.4.2.2 data relating to employee absence for the purpose of absence management procedures;
- 27.4.2.3 physical or mental health or condition or disability status to ensure employee safety in the workplace, provide appropriate workplace adjustments and to make decisions regarding an employee's fitness to work; and
- 27.4.2.4 information about employee's racial and ethnic origin; sexual orientation; religion and belief and disability information to ensure meaningful equal opportunity monitoring and reporting.

27.4.3 Where we have a necessary need to process your sensitive personal data for purposes not identified above, we will only do so only after providing you with notice and, if required by law, obtaining your prior, express consent.

27.5 DISCLOSURE OF YOUR PERSONAL DATA TO THIRD PARTIES

27.5.2 We will only disclose your personal data to third parties where required by law or to our employees, contractors, designated agents, IT software providers or other third-party service providers who require such information to assist us with administering the employment relationship with you, including third-party service providers who provide services to us or on our behalf. Third-party service providers may include, but not be limited to, payroll processors and benefits administration providers.

27.5.3 We require all our third-party service providers, by written contract, to implement appropriate security measures to protect your personal data consistent with our policies and any data security obligations applicable to us as your employer. We do not permit our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes in accordance with our instructions.

27.5.4 We may also disclose your personal data for the following additional purposes where permitted or required by applicable law:

- 27.5.4.1 to other members of our group of companies for the purposes set out in this Privacy Policy and as necessary to perform our employment contract with you;
- 27.5.4.2 as part of our regular reporting activities to other members of our group of companies;
- 27.5.4.3 to the police, regulatory bodies, legal advisors or similar third parties where we are under a legal duty to disclose or share your personal data in order to comply with any legal obligation. When we disclose your personal data to comply with a legal obligation or legal process, we will take reasonable steps to ensure that we only disclose the minimum personal data necessary for the specific purpose and circumstances;
- 27.5.4.4 to any central or local government department and other statutory or public bodies (such as HMRC, DWP) to comply with applicable law;



- 27.5.4.5 to a prospective employer of yours who requests a reference;
- 27.5.4.6 to protect the rights and property of RPP Limited;
- 27.5.4.7 during emergency situations or where necessary to protect the safety of persons;
- 27.5.4.8 where the personal data is publicly available;
- 27.5.4.9 if a business transfer or change in ownership occurs; and
- 27.5.4.10 for additional purposes with your consent where such consent is required by law.

27.6 CROSS-BORDER TRANSFERS

- 27.6.1 We do not transfer your personal information to third parties outside the EEA¹.

27.7 DATA SECURITY

- 27.7.1 All information you provide to us is stored on our secure servers. We have implemented appropriate physical, technical, and organisational security measures designed to secure your personal data against accidental loss and unauthorised access, use, alteration or disclosure. In addition, we limit access to personal data to those employees, agents, contractors and other third parties that have a legitimate business need for such access.

27.8 RETENTION OF YOUR PERSONAL DATA

- 27.8.1 Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. In any event this will not usually exceed six years from termination of your employment or engagement with us after which the personal information will be securely destroyed. Under some circumstances we may anonymise your personal data so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent.

27.9 RIGHTS OF ACCESS, ERASURE AND OBJECTION

- 27.9.1 It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your employment. By law you may have the right to request access to and correct the personal data that we hold about you or object to the processing of your personal data under certain circumstances. You may also have the right to request that we transfer your personal data to another party. If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact the Group Business Manager. Any such communication must be in writing.
- 27.9.2 We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the personal data that we hold about you or make your requested changes. Applicable law may allow or require us to refuse to provide you with access to some or all of the personal data that we hold about you, or we may have destroyed, erased, or made your personal data anonymous in accordance with our record



retention obligations and practices. If we cannot provide you with access to your personal data, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

27.10 RIGHT TO WITHDRAW CONSENT

27.10.1 Where you have provided your consent to the collection, processing and transfer of your personal data, you may withdraw that consent at any time. This will not affect the lawfulness of data processing based on consent before it is withdrawn. To withdraw your consent please contact the Group Business Manager.

27.11 CHANGES TO OUR PRIVACY POLICY

27.11.1 Any changes we may make to our privacy policy in the future will be updated on the company intranet. We will notify you if there are any changes to this policy that materially affect how we collect, store or process your personal data. If we would like to use your personal data for different purposes than those we have notified to you at the time of collection, we will provide you with notice and, where required by law, seek your consent, before using your personal data for a new or unrelated purpose. We may process your personal data without your knowledge or consent where required by applicable law or regulation.

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