

Diploma Holdings PLC

Employee Privacy Notice

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KEY SUMMARY

We process your personal information as your Employer and for no other purpose.

We share your information with suppliers who act on our behalf for services such as flight bookings or taxi services in order to support you during the course of your employment.

We share your personal information to set up your account with providers of services such as pensions, life assurance and medical care. They provide these services to you directly and not on our behalf.

This notice explains what data we process, why, how it is legal and your rights.

ABOUT US and THIS NOTICE

This Privacy Notice is provided by Diploma Holdings PLC (the "Company" or "Group" or "we" or "us") who is a 'controller' for the purposes of the General Data Protection Regulation (EU) 2016/679) and the Data Protection Act 2018. This Privacy Notice applies to all Company employees and individual contractors who we will refer to generally as 'staff'.

We take your privacy very seriously. We ask that you read this Privacy Notice carefully as it contains important information about our **processing** and your rights.

How to contact us

If you would like this Privacy Notice in another format (for example: audio, large print, braille) please [contact us at the details below](#).

- Name: **Anthony Gallagher, Group Company Secretary**
- Address: 12 Charterhouse Square, London EC1M 6AX
- Telephone number: 020 7549 5712
- Email: Anthony.gallagher@diplomapl.com

Changes to this Privacy Notice

The Privacy Notice will be provided to you when you receive your employment contract or your Offer letter of Employment. Alternatively, please contact the Group Company Secretary for a copy.

We may change this Privacy Notice from time to time. We will inform you by email when changes are made.

USEFUL WORDS AND PHRASES

Please familiarise yourself with the following words and phrases (used in **bold**) as they have particular meanings in **Data Protection Legislation** and are used throughout this Privacy Notice:

Term	Definition
Personal Data	<p>This means any information from which a <u>living individual</u> can be identified.</p> <p>This will include information such as telephone numbers, names, addresses, e-mail addresses, photographs, voice recordings. It will also include expressions of opinion and indications of intentions about Data Subjects (and their own expressions of opinion/intentions).</p> <p>It will also cover information which on its own does not identify someone but which would identify them if put together with other information which we have or are likely to have in the future.</p>
special categories of data	<p>This means any information relating to:</p> <ul style="list-style-type: none">• racial or ethnic origin;• political opinions;• religious beliefs or beliefs of a similar nature;• trade union membership;• physical or mental health or condition;• sexual life; or• genetic data or biometric data for the purpose of uniquely identifying you
criminal offence data	<p>This means any information relating to criminal convictions and offences committed or allegedly committed.</p>

Term	Definition
Processing	<p>This covers virtually anything anyone can do with Personal Data, including:</p> <ul style="list-style-type: none"> • obtaining, recording, retrieving, consulting or holding it; • organising, adapting or altering it; • disclosing, disseminating or otherwise making it available; and • aligning, blocking, erasing or destroying it.
Data Subject	The person to whom the Personal Data relates.
ICO	This means the UK Information Commissioner's Office which is responsible for implementing, overseeing and enforcing Data Protection Legislation .
Controller	This means any person who determines the purposes for which, and the manner in which, any Personal Data are processed .
Processor	This means any person who processes the Personal Data on behalf of the controller.
Data Protection Legislation	This means the laws which govern the handling of data. This includes the General Data Protection Regulation (EU) 2016/679, the Data Protection Act 2018 and any other national laws implementing that Regulation or related to data protection.

WHAT INFORMATION DO WE COLLECT?

➤ **Personal information provided by you**

To employ you or enable you to work for us as an employee, we collect the following information from you:

Personal Data	Special Categories of Data
<ul style="list-style-type: none">• Name• Contact details (address, phone number, email address)• Date of birth• Sex• Country of birth• Bank account details• UK National Insurance Number• Passport information• Photograph• Marital status• Sickness and absence records• Employment history and references• Professional qualifications• Appraisals• Training records• Persons Closely Associated• Dependents	<ul style="list-style-type: none">• Racial or ethnic origin• Physical or mental health or condition

To employ you or enable you to work for us as a contractor, we collect the following information from you:

Personal Data	Special Categories of Data
<ul style="list-style-type: none"> • Name • Contact details (address, phone number, email address) • Date of birth • Sex • Country of birth • Bank account details • UK National Insurance Number • Passport information • Photograph • Marital status • Sickness and absence records • Employment history and references • Professional qualifications • Work Visa (where appropriate) 	<ul style="list-style-type: none"> • Racial or ethnic origin • Physical or mental health or condition

In addition, we may collect **criminal offence data, only if** your position at Diploma Holdings PLC or the type of work you will do and information you will be required to handle requires us by law to carry out this check.

Travel

In relation to your work related travels (domestic and international), we need to collect the following:

Personal Data	Special Categories of Data
<ul style="list-style-type: none"> • Location of your accommodation during your travel 	<ul style="list-style-type: none"> • Medical health

CCTV

The Company may operate, from time to time, CCTVs within its work premises, which collect video footage.

➤ **Personal information provided by third parties**

We may take and hold personal and professional references about you, which may include statements as to your suitability for a particular role and personal judgements.

➤ **Personal information about other individuals**

If you provide us with information about other individuals (e.g. your next of kin), you confirm that you have informed the relevant individuals accordingly.

WHY DO WE PROCESS YOUR PERSONAL DATA?

We use your **Personal Data** for the following purposes listed in this section. We are allowed to do so on certain legal bases (please see section 'How is processing your data lawful' for further detail).

Purpose	Explanation
Payroll Pension and Accounts	To calculate and pay your salary and pension contributions and to keep business accounts.
Benefits	To calculate, pay and provide benefits such as employer pension contributions, life assurance, private medical cover.
Business Development	To develop our business generally including through marketing (i.e. we may provide your name, work contact details and/or experience to potential and existing business customers and/or suppliers).
Employee Administration	To administer your employment with us. For example, this will include, complying with employment contracts, legal obligations, our policies and to administer medical and sickness records, sick pay/leave information, holiday/absence, appraisals, promotions, whistleblowing cases, disciplinary and grievance matters, maternity, parental leave and time off for dependants.
Business Travel	To administer any travel and/or accommodation arrangements where you are required to travel within or outside of the UK for work.
Prevention and Detection of Crime	To prevent and detect crime. This might include processing special categories of data and/or criminal offences data .
Equal Opportunities and memberships	To promote and monitor equal opportunities. This might include the processing special categories of data including, religious or similar beliefs, ethnic origin and membership of a professional body or a trade union.
Tax	To administer our revenue and tax obligations with HMRC.

Training and Career Development	To administer and supervise your training and career development.
Health and Safety	To comply with health and safety laws and our policies. This may include us processing Special Categories of Data , such as details of your mental and physical health.
Regulatory and Professional Requirements	To comply with regulations and professional requirements to which Company is subject. This includes anti-bribery & corruption training.
Corporate Finance, Mergers and Acquisitions	To carry out group company restructuring, to sell any of the Group companies or acquire or merge with other businesses. We may disclose your Personal Data and special categories of data for any of the above purposes, including at negotiation stage. Any disclosure will be kept to the minimum required and will be subject to security measures and confidentiality agreements.
Automated decisions	The Company does not carry out any profiling of employees, or make any automated decision about them for example in reviewing their performance.
Monitoring and recording communications	We may monitor and record communications with you (such as telephone conversations and emails) for the purpose of quality assurance, training, fraud prevention and compliance.

HOW IS PROCESSING YOUR PERSONAL DATA LAWFUL?

Personal Data

We are allowed to **process** your **personal data** for the following reasons and on the following legal basis:

➤ **Legitimate Interests**

We are permitted to **process** your **Personal Data** if it is based on our 'legitimate interests' i.e. we have a good, sensible, practical reasons for **processing** your **personal data** which is in the interest of Diploma Holdings PLC. To do so, we have considered the impact on your interests and rights, and have placed appropriate safeguards to ensure that the intrusion on your privacy is reduced as much as possible. The table below explains the **personal data processed** on this basis.

Personal Data	Company Legitimate Interests
<ul style="list-style-type: none"> • Appraisals • Training records 	To maintain and develop efficiency and competence of our employees. This captures information about you in the context of your job role and is therefore not intrusive.
<ul style="list-style-type: none"> • Video images caught by CCTVs 	To keep our premises and employees safe from unauthorised access.
<ul style="list-style-type: none"> • Location of your accommodation during overseas travel 	So we can inform staff of unusual risks when they are abroad e.g. natural disasters, riots, military action
<ul style="list-style-type: none"> • Photos • Contact details • Professional experience 	To promote Diploma Holdings PLC to prospective stakeholders, to develop new business or grow existing relationships

➤ **Contract**

It is necessary for our performance of the employment contract you have agreed to enter with us. If you do not provide your **personal data** to us, we will not be able to carry out our obligations under the terms of your employment contract.

For example, we require your Personal Data to pay your salary.

➤ **Legal obligation**

We are subject to legal obligations to **process** your **personal data** for the purposes of complying with applicable regulatory, accounting and financial rules, health and safety and to make mandatory disclosures to government bodies and law enforcements.

➤ **Consent**

Sometimes we want to use your **personal data** in a way that is entirely optional for you, such as an occupational health assessment, or which is not directly linked to your job, such as your photos of your family at Company away-day. On these occasions, we will ask for your consent to use your information. You can withdraw this consent at any time and this will not affect your employment with us in any way.

Special Categories of Data

We are allowed to **process** your special categories of **personal data** for the following reasons and on the following legal basis:

➤ **Consent**

You have given your explicit consent for us to **process** your ethnic/religious background for diversity monitoring or if you want to undergo an occupational health assessment.

➤ **Employment**

We need to **process** your **personal data** to carry out our obligations as your employer, for example, putting in place specific equipment in our offices to cater for particular physical conditions our staff may have.

➤ **Vital Interests**

It is necessary for us to **process** your medical/health information, for the purposes of protecting your health and safety during the course of your employment.

➤ **Manifestly public Personal Data**

The **processing** relates to information that you have made public, for example, attire you wear for work and information made public on a public social media platform.

➤ **Legal claims**

If, in the **process** of your employment with us, we are required to process your data to defend or establish a legal claim, for example, if we are required to **process** your data for employment tribunals relating to employment claims under the employment law. We may also be required to **process** ethics data as required by law.

WHO WILL HAVE ACCESS TO YOUR PERSONAL DATA?

The table below lists some of our key service providers that act as our **processors** with whom we share your **personal data**. If you would like to know the names of our other service providers (e.g. insurance providers), please contact us using the details at the start of this Privacy Notice.

Who information is shared with	Personal Data
SD Worx UK	<ul style="list-style-type: none"> Name, national insurance details, date of birth, residential address, salary rate.
Corporate Traveller	<ul style="list-style-type: none"> Name, passport & Visa information.
NAVEX Global	<ul style="list-style-type: none"> Name, email address, job title, location and training details.

In addition, we share your **personal data** with the following entities who act as **separate controllers** of your **personal data**. We provide them with your details (set out below) so that they can contact you separately in order to arrange benefits directly with you, or to fulfil their own legal obligations. You should review their privacy notices to find out how they **process** your **personal data**. If you have any queries or complaints about how they **process** your **personal data** by them, please contact them separately using the contact information provided on their website.

Who information is shared with	Personal Data
HMRC	Name, national insurance number, date of birth, residential address, gross salary and tax deducted.
Standard Life	Name, address, NI number, pension contributions and transfers.

BUPA	Name, family members and residential address.
Friends Provident	Name, date of birth and salary.

Transfers of your Personal Data outside the EEA

We generally do not transfer your personal data outside the EEA, except for the purposes of appointing you to a role in a subsidiary company that is based outside the EEA, in which case your personal data may be shared with that entity to facilitate your appointment or secondment.

How we keep your data secure

We strive to implement appropriate technical and organisational measures in order to protect your **personal data** against accidental or unlawful destruction, accidental loss or alteration, unauthorised disclosure or access and any other unlawful forms of **processing**. We aim to ensure that the level of security and the measures adopted to protect your **personal data** are appropriate for the risks presented by the nature and use of your **personal data**. We follow recognised industry practices for protecting our IT environment and physical facilities.

If you have any particular concerns about your information, please contact us (see 'How to contact us?' above).

WHEN WILL WE DELETE YOUR DATA?

We will generally retain your Personal Data and Special Categories of Data during the course of your employment and for 6 years after your employment terminates. The following categories of personal data have a different retention period.

<u>Personal Data/Special Categories of Data</u>	<u>Retention period</u>
Basic employment and training records, including: <ul style="list-style-type: none"> • Recruitment records, qualifications and references • Annual/assessment reports • Job history • Resignation, termination and/or retirement letters • Travel and subsistence claims • Disciplinary/grievance matters • Annual leave records • Written particulars of employment, contracts of employment, and notices of changes to terms and conditions 	During course of employment and for six years after employment terminates
Working time opt-out forms and records to show compliance with the Working Time Regulations 1998, including: <ul style="list-style-type: none"> • Time-sheets for opted-out workers • Health assessments for night workers • Records of working hours for young-workers 	Two years from the date on which they were entered into
Collective workforce agreements and past agreements that could affect present employees	Permanently
Works Council minutes	Permanently
Maternity records Adoption and paternity records Shared parental leave records	Three years after the end of the tax year in which the maternity pay/adoption pay/ordinary paternity pay/ additional paternity pay/ shared parental pay period ends

<u>Personal Data/Special Categories of Data</u>	<u>Retention period</u>
Sickness records required for the purposes of statutory sick pay	Three years after the end of the tax year in which payments are made (the period for which employers were required to keep these records before the obligation was removed)
Employee bank details	During course of employment and until employee has received final salary and repayment of expenses.
Immigration checks	During course of employment and for two years after employment terminates
Medical, health and accident records	See health and safety retention schedule
Death Benefit Nomination and Revocation Forms	During course of employment and for six years after employment terminates
Payroll and wage records	Six years from the Company financial year-end in which payments were made
PAYE	Six years after the end of the tax years to which they relate
Any reportable accident, death or injury in connection with work	Three years from the date the report was made

YOUR RIGHTS

As a **data subject**, you have the following rights under the **Data Protection Laws**:

- the right to object to **processing** of your **personal data**;
- the right of access to **Personal Data** relating to you;
- the right to correct any mistakes in your information;
- rights in relation to automated decision making;
- the right to prevent your **Personal Data** being processed;
- the right to have your **Personal Data** ported to another controller (e.g. if you decide to contract with a different service provider); and
- the right to erasure.

These rights are explained in more detail below, but if you have any comments, concerns or complaints about the use of your Personal Data by us, please contact us (please refer to section "How to contact us").

We will respond to any rights that you exercise within a month of receiving your request, unless the request is particularly complex, in which case we will respond within three months.

Please be aware that there are exceptions and exemptions that apply to some of the rights which we will apply in accordance with the Data Protection Legislation.

➤ **Right to object to processing of your Personal Data**

You may object to us **processing** your **personal data** where we rely on a legitimate interest as our legal grounds for **processing**.

If you object to us **processing** your **personal data** we must demonstrate compelling grounds for continuing to do so. We believe we have demonstrated compelling grounds in the section headed "HOW IS PROCESSING YOUR PERSONAL DATA LAWFUL."

➤ **Right to access Personal Data relating to you**

You may ask to see what **personal data** we hold about you and be provided with:

- a copy;
- details of the purpose for which it is being or is to be [processed](#);
- details of the recipients or classes of recipients to whom it is or may be disclosed, including if they are overseas and what protections are used for those overseas transfers;

- the period for which it is held (or the criteria we use to determine how long it is held);
- any information available about the source of that data; and
- whether we carry out an automated decision-making, or profiling, and where we do information about the logic involved and the envisaged outcome or consequences of that decision or profiling.

To help us find the information easily, please provide us as much information as possible about the type of information you would like to see.

➤ **Right to correct any mistakes in your information**

You can require us to correct any mistakes in your information which we hold free of charge. If you would like to do this, please let us know the information that is incorrect and what it should be replaced with.

➤ **Rights in relation to automated decision making**

We do not make any automated decisions about you so this right does not apply.

➤ **Right to restrict processing of Personal Data**

You may request that we stop **processing** your **personal data** temporarily if:

- you do not think that your data is accurate. We will start **processing** again once we have checked whether or not it is accurate;
- the **processing** is unlawful but you do not want us to erase your data;
- we no longer need the **personal data** for our **processing**, but you need the data to establish, exercise or defend legal claims; or
- you have objected to **processing** because you believe that your interests should override our legitimate interests.

➤ **Copies of your Personal Data (data portability)**

You may ask for an electronic copy of your **personal data** which we hold electronically and which we **process** when we have entered into a contract with you. You can also ask us to provide this directly to another party.

➤ **Right to erasure**

You can ask us to erase your **personal data** where:

- you do not believe that we need your data in order to **process** it for the purposes set out in this Privacy Notice;
- if you had given us consent to process your data, you withdraw that consent and we cannot otherwise legally **process** your data;
- you object to our **processing** and we do not have any legitimate interests that mean we can continue to **process** your data; or
- your data has been **processed** unlawfully or have not been erased when it should have been.

➤ **What will happen if your rights are breached?**

You may be entitled to compensation for damage caused by contravention of **Data Protection Legislation**.

➤ **Complaints to the regulator**

It is important that you ensure you have read this Privacy Notice - and if you do not think that we have **processed** your data in accordance with this notice - you should let us know as soon as possible. Similarly, you may complain to the **ICO**. Information about how to do this is available on his website at www.ico.org.uk.