



## Employee Privacy Notice

### Employee privacy notice – Kindred Group (the "Company")

#### What is a privacy notice?

We want to ensure you understand what information we collect about you, how we will use it and for what purpose.

We are also required by data protection legislation to explain certain matters to you.

#### What personal data do we collect about you?

During your employment with us, it is routine for us to collect, process and store personal information about you.

This information includes your name, date of birth, gender, marital status, immigration status, contact details of you and your next of kin, bank and taxation details, employment history, qualifications, training records, travel and expenses records, identification documents, photos & videos, information collected using CCTV cameras, information collected by the entry pass and information relating to your performance and attendance.

We may also collect sensitive/special category personal data about you, in the form of your race or ethnicity, political opinions, religious beliefs, information about your health, as well as any criminal records you may have.

#### Where do we collect personal data about you from?

We may collect personal data about you from the following sources:

- Directly from you;
- From an agent/third party acting on your behalf. e.g. from a recruitment or employment agency;
- Through publicly available sources, such as LinkedIn;
- From our Occupational Health Providers;
- From pension/benefits providers and inland revenue;
- From trade unions (where applicable);
- From the use of our CCTV cameras and identification cards. We have cameras on our premises and your image and movements will be recorded while you are on our sites or premises;
- From our recruitment behavioural profiling tool;



- From our security tool to control the access to the building using the information collected from the entry pass provided to all Kindred staff;
- From a background check agency; and
- At the Company's events.

#### How and why do we use your personal data?

We process your personal data so that managers, the finance team and human resources can perform their everyday functions and administer your employment. For example:

- Determining your recruitment, and making decisions about your ongoing employment/engagement and the terms and conditions which will apply;
- Administering pay and benefits and making adjustments to these;
- Managing holiday, sick leave and any other absences (be that family leave, sabbatical or otherwise);
- Complying with health and safety regulation, or security measures e.g. understanding who is at work at any given time;
- Carrying out equal opportunities monitoring;
- Processing for vetting and verification purposes to determine your suitability for a particular role;
- Performing a conflict of interest risk assessment;
- Performance management and appraisal, including development via training;
- Dealing with disciplinary matters and any grievance raised by or involving you;
- Providing strictly necessary data to auditors, regulators and enforcement bodies and responding to the Subject Access Requests (this might include providing copies of any communication recorded on Kindred's systems);
- Ensuring compliance with our rules and processes, for example we may monitor CCTV records and use of our IT systems, including email, internet and intranet, company mobile and landline phones, computers and tablets to gather evidence in respect of any allegations of wrongdoing.
- Ensuring security measures to access all Kindred premises. We may collect information from the entry pass when enter or leave the building;
- Internal and external communication promoting the Company.



We will not use your information for any other purposes unless we are required to do so by law.

#### How long do we keep your personal data?

How long we keep your information will depend on the purpose for which we use it.

We only keep your information for as long as is reasonably necessary for the purposes set out in this Privacy Notice. What this means in practice will vary as between different types of information, and when we consider our approach we take into account any ongoing need for the information, as well as our legal obligations for example in relation to tax, health and safety, employment rights and potential or actual disputes or investigations.

#### Who else might your personal data be shared with?

Your personal data may be shared with third parties such our professional advisers, service providers, group companies and merger partners for the following purposes.

- Professional advisers: including accountancy and legal firms where they require that information in order to provide the Company with advice;
- Service providers: including those organisations who administer benefits and payroll for Company staff, provide and support our management and data storage systems, and agencies who carry out pre-employment vetting and checks on our behalf;
- Group companies: data may be shared internally within the group, primarily for business and operational purposes.
- Merger partners: it may be that the Company merges or is acquired by a separate organisation, in which case it will become necessary to share personal data with them.
- Regulators: for governance purposes to comply with statutory and regulatory requirements.

These third parties comply with similar and equally stringent undertakings of privacy and confidentiality.

#### What legal basis do we have for using your personal data?

We process your information:

- As this is necessary for the performance of our employment contract with you or to take steps at your request prior to entering into this contract;



- To comply with our legal obligations including in relation to health and safety at work, monitoring equality and diversity, paying employees and making the necessary deductions for income tax, benefits and pensions and employee National Insurance contributions;
- As this is necessary in pursuit of our legitimate interests including recruitment and succession planning, organisation and distribution of work, management forecasting, maintaining an efficient employee benefits program, security purposes, fraud prevention, promoting the Company and contacting you or your next of kin in emergency cases. While there are some risks inherent in any processing personal of personal data, on balance, we consider the risk to your rights of data protection is outweighed by the significant benefits in maintaining a well-managed and orderly workforce and business. You've the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on legitimate interests. More information on this right and on how to exercise it is set out below.

Where we hold sensitive/special category personal data about you (e.g. information relating to your racial or ethnic origin, health etc.) we will only process this data where you have given us your explicit consent or otherwise where this is necessary:

- For the purposes of carrying out the obligations and exercising specific rights of the Company or yourself related to employment and social security and social protection law or a collective agreement;
- (In rare circumstances) to protect your vital interests or the vital interests of another person, if you or they are incapable of providing consent;
- For the establishment, exercise or defence of legal claims; or
- For the purposes of preventative or occupational medicine and for the assessment of your working capacity.

If there are any circumstances where we feel we need to process data and it is not consistent with these reasons, we will provide you with an updated notification (or seek your express consent if that is necessary).

**What happens if you do not provide us with the information we request or ask that we stop processing your information?**

We've statutory and contractual obligations under our contract with you and under various employment related legislation that require us to process your information.

If you do not provide the personal data necessary, we may not be able to fulfil our contract with you / perform our obligations under the contract with you.



**Do we make automated decisions concerning you?**

No, we do not carry out automated decision making or automated profiling.

**Where do we store your personal data? Do we transfer your personal data outside the EEA?**

Where possible, we try to only process your information within the UK and European Economic Area (EEA). If we or our service providers transfer personal data outside of the UK or EEA, we always require that appropriate safeguards are in place to protect the information when it is processed. You can obtain a copy of the safeguards in place for such transfers by contacting us using the details at the end of this Privacy Notice.

**How do we keep your personal data secure?**

Your data is stored on Access servers. They ensure the security of your personal data by following the requirements of ISO27001 certification. This certification demands best in class controls across:

- Information security policies
- Organisation of information security
- Human resource security
- Asset management
- Access control
- Cryptography
- Physical and environmental security
- Operations security
- Communications security
- System acquisition, development and maintenance
- Supplier relationships
- Information security incident management
- Information security aspects of business continuity management
- Compliance; with internal requirements, such as policies, and with external requirements.

We also take steps to ensure all our subsidiaries, agents, affiliates and suppliers employ adequate levels of security.

**What rights do you have in relation to the personal data we hold on you?**

You have certain rights in relation to your personal data, and we have summarised those that are relevant here. For more information on your rights, or if you wish to exercise any of them, please contact us (see the contact details at the bottom of this notice)



Rights	What does this mean?
1. The right to be informed	You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we're providing you with the information in this Privacy Notice.
2. The right of access	<p>You have the right to obtain access to your information (if we're processing it), and certain other information (similar to that provided in this Privacy Notice).</p> <p>This is so you're aware and can check that we're using your information in accordance with data protection law.</p>
3. The rights to rectification and erasure	You are entitled to have your information corrected if it's inaccurate or incomplete. In limited circumstances you will have a right to have information erased (known as the right to be forgotten).
4. The right to restrict processing	You have the right to restrict some processing of your personal information, which means that you can ask us to limit what we do with it;
5. The right to object to processing	You have the right to object to certain types of processing, including processing based on our legitimate interests in some cases.
6. The right to lodge a complaint	<p>You are able to submit a complaint to the Information Commissioner's Office about any matter concerning your personal information, using the details below. However, we take our obligations seriously, so if you have any questions or concerns, we would encourage you to raise them with us first, so that we can try to resolve them.</p> <p>Office of the Information and Data Protection Commissioner, Level 2, Airways House, High Street, Sliema SLM 1549, Malta</p> <p>Tel (+356) 2328 7100, <a href="http://www.idpc.org.mt">www.idpc.org.mt</a></p>
7. The right to withdraw consent	If you have given your consent to anything we do with your personal data, you have the right to withdraw your consent at any time (although if you do so, it does not



	mean that anything we have done with your personal data with your consent up to that point is unlawful).
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8. The right to be informed	You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we're providing you with the information in this Privacy Notice.
9. The right of access	You have the right to obtain access to your information (if we're processing it), and certain other information (similar to that provided in this Privacy Notice).  This is so you're aware and can check that we're using your information in accordance with data protection law.
10. The right to rectification	You are entitled to have your information corrected if it's inaccurate or incomplete.
11. The right to erasure	This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your information where there's no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions.
12. The right to restrict processing	You have rights to 'block' or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for further use of their information to be 'blocked' to make sure the restriction is respected in future.
13. The right to data portability	You have rights to obtain and reuse your personal data for your own purposes across different services.
14. The right to object to processing	You have the right to object to certain types of processing, including processing based on our legitimate interests and processing for direct marketing.
15. The right to lodge a complaint	You have the right to lodge a complaint about the way we handle or process your personal data with your national data protection regulator.



16. The right to withdraw consent	If you have given your consent to anything we do with your personal data, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful).
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#### How will we handle a request to exercise your rights?

We'll respond as soon as we can. Generally, this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we'll come back to you and let you know.

We usually act on requests and provide information free of charge, but may charge a reasonable fee to cover our administrative costs of providing the information for:

- baseless or excessive/repeated requests, or
- further copies of the same information.

Alternatively, the law may allow us to refuse to act on the request.

#### Questions?

If you have any questions about anything in this privacy notice, please contact data protection officer at [DPHR@kindredgroup.com](mailto:DPHR@kindredgroup.com).

Our general contact details are [peopleservices@kindredgroup.com](mailto:peopleservices@kindredgroup.com).

Kindly sign this letter, confirming that you have read and understood the above.

Employee Name:

Signature: