

EMPLOYEE AND RECRUITMENT PRIVACY NOTICE

1 The Purpose of this Document

- 1.1 We take your privacy seriously. You can find out more here about your privacy rights and how we gather, use and share personal data about you during and after your working relationship with us, in accordance with Data Privacy Laws.
- 1.2 It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are aware of how and why we are using such information. We will update this notice if we make any significant changes affecting how we use your personal data, and if so we will contact you to let you know about the change.

2 About us

- 2.1 We are what is known as the 'controller' of personal data we gather and use. When we say 'we', 'us' or 'PZ' in this notice, we mean your employing entity within the PZ Cussons group. Sometimes, your employing entity will act together with other entities throughout the PZ Cussons group, including PZ Cussons (International) Ltd, and act as a "joint controller".
- 2.2 This notice does not form part of your contract and it may be amended at any time.

3 Your Privacy Rights

- 3.1 You have various rights in respect of the personal data we hold about you – these are set out in more detail below. If you wish to exercise any of these rights, please contact the Head of Corporate Services – Europe or the Group Data Protection Officer, at dataprotection@pzcussons.com.
- 3.2 **Right to object:** You can object to our processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. Please contact us as noted above, providing details of your objection.
- 3.3 **Access to your personal data:** You can request access to a copy of your personal data that we hold, along with information on what personal data we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. You can make a request for access free of charge. Please make all requests for access in writing, and provide us with evidence of your identity.
- 3.4 **Consent:** Most of the time, we won't need your consent to use your personal data as we will be using it only to fulfil our obligations and exercise our rights as an employer. If you have given us your consent to use personal data, you can withdraw your consent at any time.
- 3.5 **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal data held about you.
- 3.6 **Erasure:** You can ask us to delete your personal data where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.
- 3.7 **Portability:** You can ask us to provide you or a third party with some of the personal data that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.

3.8 **Restriction:** You can ask us to restrict the personal data we use about you where you have asked for it to be erased or where you have objected to our use of it.

3.9 **No automated-decision making:** Automated decision-making takes place when an electronic system uses personal data to make a decision without human intervention. You have the right not to be subject to automated decisions that will create legal effects or have a similar significant impact on you, unless you have given us your consent, it is necessary for a contract between you and us or is otherwise permitted by law. You also have certain rights to challenge decisions made about you.

4 What Kinds of Personal Data we Use

4.1 In the course of our working relationship with you, including during the recruitment process and exit process, we will collect, store, and use the following categories of personal data about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses
- Date of birth
- Gender
- Marital status and dependants
- Next of kin and emergency contact information
- National Insurance number
- Bank account details, payroll records and tax status information
- Salary, annual leave, pension and benefits information
- Start date and end date
- Location of employment or workplace
- Identification information (including a copy of driving licence, passport and utility bills)
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process)
- Employment records (including job titles, work history, working hours, training records and professional memberships)
- Compensation history
- Performance and bonus information
- Disciplinary and grievance information
- CCTV footage and other information obtained through electronic means such as access entry and exit records

- Information about your use of our information and communications systems
 - Records of interviews carried out as part of an exit process or for disciplinary or investigative purposes
- 4.2 Some kinds of personal data are given special protection by the law – these are called 'special category' data. We will sometimes collect, store and use the following types of 'special category' personal data:
- Information about your ethnicity for equality monitoring purposes
 - Trade union membership
 - Information about your health, including any medical condition, health and sickness records
 - Biometric data (for example, identification photographs, photographs and images captured by our CCTV system)
 - Information about your criminal convictions and offences (for example, DBS and DVLA checks).

5 How We Gather your Personal Data

We will obtain your personal data in different ways:

- directly from you, for example when you apply to join the company, fill out an application and provide supporting documents;
- during the application and recruitment process, from an employment agency or background check provider, your former employers and credit reference agencies;
- from information we produce or receive from third parties such as HMRC or healthcare providers;
- personal data created by you during the course of your employment, including recordings made of meetings or calls
- from monitoring emails, internet and telephone usage and when we use CCTV.

6 How We Use your Personal Data

6.1 We process your personal data for the following purposes:

- primarily, so that we can fulfil our contractual obligations with you (for example, to pay you and provide benefits to you), or in connection with you performing your duties as an employee, and to take steps at your request prior to entering into a contract with you;
- to comply with legal obligations that apply to us;
- protecting your vital interests, such as the prevention of or in response to health or safety incidents;
- to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests, or where

necessary to protect the interests of you or others (for example, monitoring misuse of our IT systems. This includes analytics, assurance and audits relating to the other processing activities.

- 6.2 More detail about how we use your personal data, as well as the categories of personal data involved, is set out in the Appendix.

7 How We Use Particularly Sensitive Personal Data

- 7.1 Special protection is given to certain kinds of personal data that is particularly sensitive. This is information about your health status, religious or philosophical beliefs, ethnic origin, biometric identifiers, trade union membership or criminal convictions or offences.
- 7.2 We use this personal data primarily to comply with our legal obligations (including in respect of health and safety), for equal opportunity monitoring, to manage sickness and administer your benefits. Where employees are eligible for a company vehicle, we carry out DVLA checks which may reveal past criminal convictions.
- 7.3 More detail about how we use special categories of personal data and information about criminal convictions, as well as the categories of personal data involved, is set out in the Appendix.

8 If You Fail to Provide Personal Data

In some cases, if you fail to provide information when requested, we may not be able to perform the contract we have entered into with you fully (such as paying you or providing benefits), we may not be able to enter into a contract with you, or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our staff).

9 Monitoring

- 9.1 It is necessary for us monitor our staff in various ways in order to ensure safety and security and protect our staff. We may monitor our staff in the following ways:
- through access control entry and exit data;
 - staff may be captured by CCTV systems, we use for security and disciplinary purposes;
 - through recordings made of meetings or calls;
 - looking at use of email or website visits;
 - DVLA checks;
 - criminal records checks; and
 - equality monitoring.
- 9.2 We process personal data obtained through such monitoring to the extent it is necessary and proportionate and it is permitted by law (please see the Appendix for more information).
- 9.3 If you have any concerns in relation to monitoring, please speak to the Head of Corporate Services – Europe or the Group Data Protection Officer at dataprotection@pzcussons.com

10 Our Legal Basis for Using your Personal Data

- 10.1 We only use your personal data where it is permitted by the laws that protect your privacy rights. To find out more about the legal bases we rely on to use your personal data, please see the Appendix.
- 10.2 We do not need your consent to use your personal data where the law otherwise allows us to use it. In limited circumstances, we may approach you for your consent to allow us to process certain personal data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can consider whether you wish to consent. You may withdraw your consent at any time.

11 Sharing your Personal Data With Others

- 11.1 We will share your personal data with third parties where required by law, or where it is necessary to administer the working relationship with you or where we have a legitimate interest. We will only share your personal data to the extent needed for those purposes.
- 11.2 We share personal data for these purposes with:
- Group companies, for example if you transfer from one company to another within the Group or where services such as IT are centrally managed; and
 - with external providers such as payroll, pension administration, benefits provision, occupational health and psychometric testing, training systems and IT services.

12 Other privacy notices

You may be presented with other privacy notices in the course of your employment – for example when you interact with third parties providing services to you or to PZ Cussons. Those privacy notices should be read together with this privacy notice, and to the extent the information in another privacy notice relates to information processed by a processor, it supersedes the information in this privacy notice.

13 Data Retention

We will never retain your personal data for any longer than is necessary for the purposes we need to use it for. Generally, we keep your employment records for 6 years after you stop working with us with the exception of some data which we are required to retain (for example in relation to pensions or defending legal claims). For unsuccessful recruitment candidates, we keep your application details for a period of 12 months following the end of your application.

14 Transfers Outside the UK

We may need to transfer your personal data outside the UK to other Group companies, service providers, agents, subcontractors and regulatory authorities in countries where data protection laws may not provide the same level of protection as those in the UK. Where we transfer your personal data outside the UK we will always make sure this is done securely. For more information about this please contact dataprotection@pzcussons.com.

15 Right to Complain

You can make a complaint to us by contacting us via the Head of Corporate Services – Europe, to the Group Data Protection Officer at dataprotection@pzcussons.com or

directly to the data protection supervisory authority – in the UK, this is the Information Commissioner's Office, at <https://ico.org.uk/>.

16 Keeping You Up to Date

We reserve the right to change this notice at any time. Where appropriate, we shall notify data users of this notice of those changes by email and/ or posting on the intranet and/or notice boards.

APPENDIX

	Purpose for Processing	Categories of Personal Data	Legal Basis
1.	For the administration of your employment	Personal contact details, date of birth, marital status, next of kin, national insurance number, bank account, salary, annual leave, pension and benefits, start date, location of employment, job title	We need to use the information in order to perform our contract with you.
2.	To contact you about office closures and things that affect your work	Personal contact details, office attendance, next of kin	We have a legitimate interest in keeping you up to date with the running our business in order for you to perform your job role.
3.	The recruitment and selection process	Personal contact details, date of birth, marital status, next of kin, national insurance number, bank account, salary, annual leave, pension and benefits, start date, location of employment, job title, CV, covering letter, qualifications, salary information, job title	We need to use the information in order to enter into a contract with you.
4.	The recruitment and selection process	Diversity information such as gender, ethnicity	Monitoring of equality of treatment.
5.	Talent pooling as part of the recruitment process	Personal contact details, date of birth, marital status, next of kin, national insurance number, bank account, salary, annual leave, pension and benefits, start date, location of employment, job title, CV, covering letter, qualifications, salary information, job title	We have a legitimate interest in retaining employment applicants' details for future job vacancies for a period of 12 months.
6.	Checking you are legally entitled to work in the UK	Passport, visas, marriage certificates, National Insurance number, date of birth	We need to use the information in order to comply with our legal obligations
7.	Paying you and the provision of staff benefits	Salary, bank account details, pay records, tax status, pension and benefits information, name, address, national insurance number, marital status, next of kin, annual leave, employment start date, gender, job title, work location, use of current benefits	We need to use the information in order to perform our contract with you
8.	Deducting tax and	Salary, bank account	It is necessary in order

	National Insurance contributions and paying the same to tax authorities	details, pay records, tax status, pension and benefits information, name, address, national insurance number, work location	to comply with our legal obligations
9.	Conducting performance reviews, managing performance and determining performance requirements	Name, job title, performance information, start date	Also, we have a legitimate interest in overseeing staff development and providing support where needed
10.	Exit interviews	Records of any personal data you provide as part of an exit interview	We have a legitimate interest in understanding the reasons employees leave the business
11.	Making decisions about salary reviews and compensation	Name, job title, performance data, salary, benefits, start date,	We have a legitimate interest in monitoring salaries and determining what to pay our workforce
12.	Occupational health services	Name, date of birth, gender, address, location of workplace, start date, national insurance number, medical records, job title	We need to use the information in order to meet our obligations under employment law
13.	The provision of medical insurance	Name, date of birth, gender, address, location of workplace, start date, national insurance number, medical records, job title	We need to use the information to assess your working capacity and provide preventative or occupational medicine, medical diagnosis and health care or treatment where necessary
14.	Health assessments for fitness to work	Name, date of birth, gender, address, location of workplace, start date, national insurance number, medical records, job title	We need to use the information to assess your working capacity
15.	Pensions administration	Personal contact details, date of birth, marital status, next of kin, national insurance number, bank account, salary, annual leave, pension and benefits, start date, location of employment, job title, gender	Also, it is necessary in order to comply with our legal obligations
16.	Disciplinary matters, staff disputes,	Name, address, job title, date of birth, salary, benefits, performance data, gender, job location, compensation history	We need to use the information in order to perform our contract with you
17.	Employment tribunals	Name, address, job	for the establishment,

		title, date of birth, salary, benefits, performance data, gender, job location, compensation history	exercise or defence of legal claims
18.	Staff training and development	Name, job title, performance history, qualifications, training usage and attendance, assessment results	We have a legitimate interest in providing training to our staff
19.	Staff monitoring	CCTV, job location, work performance, your use of devices and software provided by the company, use of company telephone, internet traffic, metadata relating to the above	We have a legitimate interest in monitoring the security of our property and systems and ensuring that company equipment and the network is not being misused.
20.	On side attendance – staff monitoring	Access control entry and exit data, desk booking data	We have a legitimate interest in ensuring that our facilities are used appropriately and that staff comply with our hybrid working policies
21.	Occupancy – staff monitoring	Access control entry and exit data	We have a legitimate interest in ensuring our offices are occupied at safe level and to properly respond to emergencies
22.	Preventing fraud, crime and other behaviour that contravenes our policies	CCTV, job location, work performance, your use of devices and software provided by the company, use of company telephone, internet traffic, metadata relating to the above	For the establishment, exercise or defence of legal claims in relation to your performance in accordance with employment law.
23.	Helping employees build better habits, improve time management and their work-life balance	Email, calendar, chat and call activity generated by using Office 365 or Teams, Windows 10 activity history data, such as the usage of apps and services on a device, documents and internet browsing; Internet traffic; data such as email read rates; metadata relating to the above	We have a legitimate interest in the wellbeing and productivity of our employees
24.	Vetting, including criminal records checks	Criminal convictions and offences, driving licence	We may need to undertake criminal checks before and during your employment in order for us to prevent unlawful acts.

25.	Assessing our performance against equality objectives as set out by the Equality Act 2010	Gender, salary, job title, disability, sexual orientation, ethnicity, nationality, religious belief, age, race	We need to use the information for equality monitoring purposes which is considered to be in the public interest
26.	Compliance with disclosure and insider dealing laws and investigations relating to the same	Name, birth surname, work contact details, job title, details about your access to potential or actual inside information, date of birth, national identification number, personal contact details and address	To comply with our legal obligations
27.	Business planning and analytics including in connection with a potential or actual transaction	Name, age, performance history, job history, CV, job title, salary, length of employment, gender	We have a legitimate interest in evaluating appropriate organisational structures and reporting lines, including in relation to talent development and succession planning
28.	Subsidiary governance	Name, address, occupation, date of birth, conflicts of interest, details relating to your directorships or shareholdings, identity documents	We have a legal obligation to keep and file certain information relating to directors and shareholders of PZ Cussons' legal entities
29.	Managing complaints or requests by employees	Any data provided by you or necessary to investigate or resolve the complaint or request	We have a legitimate interest in responding to complaints or requests raised by employees
30.	The provision of intra-company social media, communications and events	Account details and history, usage details, attendance, name, email address	We have a legitimate interest in our employees interacting and communicating with each other in an informal manner
31.	Analytics, audits and risk management	All of the above	We have a legitimate interest in analysing and auditing the above processing activities to ensure appropriate usage, to ensure correct procedures are followed, and to ensure risks are appropriately identified and mitigated.
32.	To disseminate training material, presentations, or team meetings to employees	Recordings of calls or meetings (electronic or physical)	For employees to carry out their duties as per their employment contracts
33.	To prepare for actual or contemplated legal proceedings	Recording of calls or meetings (electronic or physical)	We have a legitimate interest in defending PZ Cussons against actual or contemplated legal disputes

This document was last updated in May 2023