

SECURE MANAGEMENT UK LIMITED

EMPLOYEE PRIVACY NOTICE

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your working relationship with us.

This notice applies to current and former employees, workers, directors and contractors. This notice does not form part of any contract of employment or other contract to provide services.

References to **we**, **our** or **us** in this privacy notice are to SECURE MANAGEMENT UK LIMITED Limited which is a limited company incorporated and registered in England and Wales under company number 05277564 and our registered office is at Estate Office, Stag Industrial Estate, Oxford Street, Bilston, West Midlands, WV14 7HZ.

1. PERSONAL INFORMATION

- When you interact with us in relation to your work with us, you may provide us with or we may obtain **personal information** about you, such as information regarding your:
 - 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, details of family members and emergency contacts;
 - national insurance number and other tax or governmental identifiers;
 - bank accounts, payroll and tax status;
 - salary, annual leave, pension and benefits;
 - start date and leaving date;
 - location of employment or workplace;
 - driving licence (including copies where we are required to hold such information for identification or insurance purposes where you are to use our vehicles);
 - Identification documents, such as passport, driving licence, bank statements or utility bills (including copies where we are required to hold such information for identification purposes);
 - Professional services qualifications (including copies where we are required or need to verify qualifications are held);
 - recruitment (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;
 - pension and pension entitlements;
 - performance including that generated through our appraisal systems;
 - disciplinary and grievance information;
 - movements though CCTV footage and other information obtained through electronic means such as swipecard and key fob records;
 - use of our information and communications systems, including the computers and fixed and mobile phones that we allow you to use;
 - images in photographic form;
 - your attendance at events;
 - shareholding, option, SARS and dividend entitlement; and
 - loans that you have made to us or we have made to you.

- Depending on the nature of our interactions with you, there may be certain essential personal information that we must collect from you in relation to your relationship with us. This will vary depending on the relationship we have with you.
- We may also ask you for additional personal information which it is optional for you to provide but which will allow us to better tailor our relationship with you. For example, you may provide us with additional contact details to make it easier for us to get in touch with you, or with additional information about your dietary preferences in connection with a social engagement.
- We will always aim to make it clear which personal information it is necessary for you to provide and which personal information is optional. However, if you are unsure as to whether you are required to provide any particular piece of personal information please ask.
- We typically collect personal information about employees, workers, directors and contactors through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies. We will also collect additional personal information in the course of job-related activities throughout the period of you working for us.

2. USES MADE OF THE INFORMATION

- We are committed to protecting your privacy, and will only use your personal information in accordance with applicable data protection legislation, including the General Data Protection Regulation and the Data Protection Act 2018.
- We need all the categories of information in the list in paragraph 1 above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. These legitimate interests are to manage our relationship with you, determine our respective rights and obligations and to properly conduct our business. There are more limited circumstances where we process personal data pursuant to your consent.
- The situations in which we will process your personal information are listed below.

Purpose	Personal information used	Lawful basis
Making a decision about your recruitment or appointment	<ul style="list-style-type: none"> • All the personal information we collect 	<p>We have a legitimate interest in making sound employment decisions.</p> <p>In relation to special category personal data that we process we do so on the basis of your specific consent when applying for a job or where it is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law.</p>
Checking you are legally entitled to work in the UK	<ul style="list-style-type: none"> • All the personal information we collect 	We have a legal obligation to check the lawful employment status of our staff and potential recruits.
Assessing qualifications for a particular job or task	<ul style="list-style-type: none"> • All the personal information we collect 	We have a legitimate interest to ensure staff are appropriately skilled and qualified.
Assessing and implementing changes to our sites to accommodate any disability to which you are subject	<ul style="list-style-type: none"> • Information regarding your disability and work patterns 	This is necessary for the purposes of carrying out the obligations and exercising specific rights in the field of employment law or is otherwise with your specific consent.
Administering the contract we have entered into with you	<ul style="list-style-type: none"> • All the personal information we collect 	This is necessary to fulfil our contract with you or is otherwise with your specific consent.
Business management and planning, including accounting and auditing	<ul style="list-style-type: none"> • All the personal information we collect 	We have a legal obligation to have our accounts audited and otherwise have a legitimate interest to effectively plan our business.
Paying you and, if you are an employee,	<ul style="list-style-type: none"> • Your salary and hours of work 	This is necessary to fulfil our contract with you. Tax deductions are made under a

deducting tax and National Insurance contributions	<ul style="list-style-type: none"> Your payment information 	legal obligation to which we are subject.
Making decisions about salary reviews and compensation including decisions about promotions	<ul style="list-style-type: none"> Your performance information and salary information 	We have a legitimate interest to manage our staff to improve the services we provide.
Providing benefits of employment or working, including flexible benefits	<ul style="list-style-type: none"> All the personal information we collect 	This is necessary to fulfil our contract with you or is otherwise with your specific consent.
Liaising with your benefits provider, for example pensions, private health insurance, dental insurance	<ul style="list-style-type: none"> All the personal information we collect 	This is necessary to fulfil our contract with you for the purposes of carrying out the obligations and exercising specific rights in the field of employment law or is otherwise with your specific consent.
Managing sickness absence	<ul style="list-style-type: none"> All the personal information we collect 	We have a legitimate interest in managing the absences of our staff. To the extent that this involves the processing of special category personal data we do so for the purposes of carrying out the obligations and exercising specific rights in the field of employment law.
Complying with health and safety obligations including accidents at work	<ul style="list-style-type: none"> All the personal information we collect (but not your payment information) 	We have a legal obligation in relation to the health and safety of those working on our premises.
To comply with our legal obligations, for example in relation to PAYE, National Insurance, Companies House filings	<ul style="list-style-type: none"> All the personal information we collect 	We have a legal obligation to do so.
Ensuring the security of our systems and information as well as client information	<ul style="list-style-type: none"> All the personal information we collect 	We have a legitimate interest to manage the security of our systems.
To monitor your use of our information and communication systems to ensure compliance with our IT policies	<ul style="list-style-type: none"> All the personal information we collect 	We have a legitimate interest to manage the security of our systems.
To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution	<ul style="list-style-type: none"> All the personal information we collect (but not your payment information or information about your relatives) 	We have a legitimate interest to manage the security of our systems.
Conducting performance reviews, managing performance and determining performance requirements	<ul style="list-style-type: none"> All the personal information we collect (but not your payment information or information about your relatives) 	We have a legitimate interest to manage our staff and improve the services we provide.
Gathering evidence for possible grievance or disciplinary hearings	<ul style="list-style-type: none"> All the personal information we collect (but not your payment information or information 	We have a legitimate interest to manage our staff and improve the services we provide.

	about your relatives)	
Dealing with legal disputes involving you, or other employees, workers and contractors	<ul style="list-style-type: none"> All the personal information we collect 	We have a legitimate interest to manage our staff and improve the services we provide.
Making decisions about your continued employment or engagement	<ul style="list-style-type: none"> All the personal information we collect (but not your payment information or information about your relatives) 	We have a legitimate interest to manage our staff to improve the services we provide.
Making arrangements for the termination of our working relationship	<ul style="list-style-type: none"> All the personal information we collect 	We have a legitimate interest to manage our staff to improve the services we provide
To conduct data analytics studies to review and better understand employee retention and attrition rates	<ul style="list-style-type: none"> All the personal information we collect (but not information about your relatives) 	We have a legitimate interest to improve the services we provide through continuity of employment
Staff training	<ul style="list-style-type: none"> Information about your training needs and previous training undertaken 	We have a legitimate interest to train staff and improve the services we provide.
To prevent and detect criminal or improper acts	<ul style="list-style-type: none"> Your usage of our systems Your use of entry key-fobs CCTV (where installed) 	We have a legitimate interest to ensure that criminal acts are not committed using our systems or on our premises.
Sale or takeover of our business	<ul style="list-style-type: none"> All the personal information we collect 	We have a legitimate interest in relation to corporate transactions relating to us.
Equal opportunities monitoring	<ul style="list-style-type: none"> All the personal information we collect 	This is for the purposes of carrying out the obligations and exercising specific rights in the field of employment law.
Storage of records relating to you and also records relating to our business	<ul style="list-style-type: none"> All the personal information we collect 	We have a legitimate interest in effective record keeping.
Managing your shareholding in us, your rights to shares and dividend details	<ul style="list-style-type: none"> Your salary information Your payment information Your existing shareholding in us Your entitlement to shares or SARS 	We have a legitimate interest in effective record keeping.
Loans we have made to you	<ul style="list-style-type: none"> Details of the loan made Your salary details Your payment details 	We have a legitimate interest in effective record keeping and to ensure that loans are repaid in accordance with the terms of the loan.
Season ticket loans	<ul style="list-style-type: none"> Details of the season ticket purchased Your repayment plan 	We have a legitimate interest in effective record keeping and to ensure that loans are repaid in accordance with the terms of the loan.
Petty cash	<ul style="list-style-type: none"> Details of your withdrawals of petty cash 	We have a legitimate interest in effective record keeping.
Details of your driving licence	<ul style="list-style-type: none"> Information regarding your driving licence (including convictions) 	This is typically only used in respect of your usage of our vehicles. Our processing of details of your convictions on your driving licence is undertaken with your consent. This consent may be withdrawn at any time but if you withdraw this consent, we are entitled to prevent you from using one of our vehicles.
Expenses	<ul style="list-style-type: none"> Details of the expenses claimed Your bank details 	We have a legitimate interest in effective record keeping.

Security passes	<ul style="list-style-type: none"> • Your image • Details of issue of pass 	We have a legitimate interest to manage the security of our premises.
Promotional photographic images	<ul style="list-style-type: none"> • Your image 	Where you appear as part of a group in attendance at an event, we have a legitimate interest in informing others of the event. We may also use individual photographs of senior managers and professional staff on our website and in tender documents and have a legitimate interest in so doing.
Business continuity	<ul style="list-style-type: none"> • Your contact details 	We have a legitimate interest in knowing how to contact you upon the occurrence of a business continuity event.

- Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information. We have indicated the main ones above, but these are not exhaustive.
- We may also use your personal information in the following situations, which are likely to be rare:
 - where we need to protect your vital interests (or someone else's vital interests); or
 - where it is needed in the public interest.
- If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit) or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).
- We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
- Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.
- We may collect and use information regarding your usage of the computer systems and facilities we make available to you, including your internet browsing history, the emails you send and receive and any removable media that is inserted into one of our computers. Such information is used for the basis of accounts and records, to determine that any personal usage of these systems is reasonable, in relation to determining your transactions with other employees, representatives, clients and suppliers and in relation to the security of these systems. We have a legitimate interest in so doing. We will not monitor telephone calls that you make unless this has been specifically required by you (but we are entitled to review and retain logs of telephone calls). We will not review the content of any e-mail that you send or receive that has the text "Private:" in the subject line unless we have reasonable evidence or suspicion of improper conduct and reasonably consider that these e-mails may be related to the improper conduct.
- You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

3. **SPECIAL CATEGORY PERSONAL INFORMATION**

- We may also collect, store and use the following "special categories" of more sensitive personal information regarding you:
 - information about your race or ethnicity, religious beliefs, sexual orientation and political opinions;
 - information about your trade union memberships;
 - information about your health, including any medical condition, health and sickness records;
 - biometric information about you, for example fingerprints or retina scans; and
 - information about your criminal convictions and offences.
- "Special categories" of particularly sensitive personal information require differing levels of protection. We need to have different justifications for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:
 - with your explicit written consent;
 - where we need to carry out our legal obligations relating to employment law, social security law or social protection law;

- where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our pension scheme;
 - where it is needed to establish, bring or defend legal claims; and
 - where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.
- Less commonly, we may process this type of information where it is needed to protect your vital interests (or someone else's vital interests) and you are not capable of giving your consent, or where you have already made the information public.
 - We will use your personal information in the following special categories in the following ways:
 - we will use information relating to your absence from work, which may include sickness absence or family-related absences, to comply with employment and other laws;
 - we will use information about criminal convictions to comply with law and in order to determine your lawful eligibility to undertake particular types of work;
 - we will use information about your physical or mental health to provide you with benefits under your contract and when agreeing to these benefits you will have at the same time consented to our processing of this information for this purpose;
 - we will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits; and
 - we will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.
 - We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law, social security law or social protection law or where it is needed to establish, bring or defend legal claims or it is in the public interest. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive 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 carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.
 - Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in paragraph 9. Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain benefits to you.

4. **DISCLOSURE OF YOUR PERSONAL INFORMATION**

- We may share your personal information where it is necessary to administer the working relationship or we have a legitimate interest in so doing. We may also disclose your personal information to third parties if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce or apply such other terms as apply to our relationship, or to protect rights, property, or safety of our other employees, workers and contractors our customers, ourselves or others with you or where we have a legitimate interest in doing so. This includes exchanging information with other companies and organisations for the purposes of providing references and fraud protection.
- "Third parties" includes third-party service providers (including contractors and designated agents) and our other entities a list of which can be found here <https://moneycom.biz/privacy-notice> ("Group").
- The third parties we share your personal information with where required by law are courts and governmental agencies.
- The third parties we share your personal information with where it is necessary to administer the working relationship with you include (where you are a contractor) the client of ours for whom you are ultimately providing services to.
- The following activities are carried out by third-party service providers: payroll, pension administration, benefits provision, professional advisors and administration and IT services. All our third-party service

providers and other entities in the group are required to take appropriate security measures to protect your personal information.

- We do not allow our third-party service providers who only process data in accordance with our instructions to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions. Some third parties we share your personal information with process it for their own purposes, and will therefore be a data controller in their own right. This is usually where they are providing you with their own product, services or fulfilling a regulatory or legal function. This would include for example tax authorities, pension providers and insurance providers. They should provide you with their own privacy notice which is equivalent to this privacy notice to explain how your personal information will be used.
- We will share your personal information with other entities in our group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data. All members of the Group are bound by this privacy notice.
- We will share your personal information with other third parties where we are legally obliged or permitted to do so, for example tax authorities, law enforcement authorities, security authorities and other government agencies.
- We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with regulatory requirements.
- In certain cases the disclosure of your personal information to a third party as described in this paragraph 4 may involve your personal information being transferred outside of the United Kingdom. This may be to:
 - a country in the European Economic Area or that is otherwise considered to have data protection rules that are equivalent to those in the United Kingdom; or
 - a country which is not considered to have the same standards of protection for personal data as those in the United Kingdom, in which case we will take all steps required by law to ensure sufficient protections are in place to safeguard your personal information, including where appropriate putting in place contractual terms approved by the relevant regulatory authorities.
- For more information about the circumstances in which your personal information may be disclosed to third parties and the safeguards we put in place to protect your personal information when we do so, please contact us as described in paragraph 9.

5. DATA SECURITY

- We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know or where there is a legal obligation or permission for them to access your personal information. Any data processor acting for us will only process your personal information on our instructions and they are subject to a duty of confidentiality. Where a third party is a data controller, i.e. they control how your personal information is used, then they will be subject to compliance with data protection and privacy laws and should provide you with an equivalent privacy notice which sets out the bases and uses they will make of your personal information. Examples would be tax authorities, pension providers and insurance providers.
- We have put in place procedures to deal with any suspected data security breach or data loss and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

6. YOUR RIGHTS AND RETENTION, UPDATING AND REMOVAL OF YOUR PERSONAL INFORMATION

- The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic records for a period of 12 years (if you are a current employee, this may be for 12 years after your employment ends). Exceptions to this rule are:
 - CCTV records which are held for no more than 90 days unless we need to preserve the records for the purpose of prevention and detection of crime;
 - details regarding unsuccessful job applicants where we hold records for a period of not more than 6 years;

- information that may be relevant to personal injury claims, employment claims, discrimination claims may be retained until the limitation period for those types of claims has expired: for personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after you have worked for us; and
- information that may be useful to a pension provider or benefit provider which we may retain for the period that your pension or benefit is payable.
- It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you move home or change your phone number or email address.
- Under certain circumstances, by law you have the right to:
 - request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it;
 - request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected;
 - request the erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to stop processing personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground;
 - request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it;
 - object to the processing of your personal information based on legitimate interests, but not if we have a compelling reason to process it;
 - object to automated decision making (although this does not currently apply as we do not currently carry out automated decision making); and
 - request the transfer of your personal information to another party.
- If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, object to automated decision making or request that we transfer a copy of your personal information to another party, please use the contact details in paragraph 9.
- You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.
- We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to or amended by any person who has no right to receive it or amend it.

7. ENQUIRIES, ISSUES AND COMPLAINTS

- In the unlikely event that you have any concerns about how we use your personal information, please contact us as described in paragraph 9.
- If you make a complaint about our handling of your personal information, it will be dealt with in accordance with our complaints handling procedure accessible from Raj Sangha.
- If we are unable to resolve your complaint, you may make a complaint to the Information Commissioner’s Office. Please see <https://ico.org.uk/for-the-public/raising-concerns/> for more information.

8. CHANGES TO THIS PRIVACY NOTICE

- We reserve the right to alter this privacy notice at any time. Such alterations will be issued to you and posted on our website <https://moneycom.biz/privacy-notices>. You can also obtain an up-to-date copy of our privacy notice by contacting us as described in paragraph 9. Should you object to any alteration, please contact us.

9. CONTACTING US

- If you need to contact us about this notice or any matters relating to the personal information we hold on you, you can do so via Raj Sangha, Secure Management UK Limited, Estate Office, Stag Industrial Estate, Oxford Street, Bilston, West Midlands, WV14 7HZ or email info@moneycom.biz

10. FURTHER INFORMATION

- We hope that the contents of this privacy notice address any queries that you may have about the personal information we may hold about you and what we may do with it. However, if you do have any further queries, comments or requests, please contact us as described in paragraph 9 above.
- Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.