

Group Employee Privacy Policy

PURPOSE

At Biocair, a part of the DPD Group, we take your privacy and manage your personal data seriously. This notice sets out 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 the UK General Data Protection Regulation, which forms part of the Data Protection Act (2018) and the General Data Protection Regulation (EU) 2016/679. Both these laws apply to what we do, as well as other global data protection and privacy laws, which may be updated or replaced from time to time.

SCOPE

Where local laws apply whose requirements exceed this policy, these shall be applied. At all other times this group policy shall be in place

RESPONSIBILITIES

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.

CONTENT OF POLICY

1. About us

We are what is known as the 'controller' of personal data we gather and use. When we say 'we' or 'us' in this notice, we are referring to Biocair Ltd as part of the DPD Group and all subsidiary companies of DPD Group.

This notice does not form part of your contract and it may be amended at any time.

2. Your Privacy Rights

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 Data Protection Officer at dataprotection@biocair.com.

(a) **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 basis. Please contact us as noted above, providing details of your objection.

(b) **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 to the Data Protection Officer.

(c) **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. There are limited circumstances where we may ask for your consent to process your information. Where you have given us your consent to use personal data, you can withdraw your consent at any time. Please see paragraph 10 (Our Legal Basis for Using your Personal Data) below.

(d) **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal data held about you.

(e) **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. Please be aware that we may have legal obligations to retain employee records for a certain period after your employment: please see paragraph 12 (Data Retention) below for more information. Where we are required by law to keep certain information, we will be unable to delete such information.

(f) **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. This will depend upon the lawful basis used.

(g) **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.

(h) **No automated decision making:** Automated decision-making takes place when an electronic system uses personal data to decide 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;

- (i) you have given us your consent
- (ii) it is necessary for a contract between you and us, or
- (iii) is otherwise permitted by law.

You also have certain rights to challenge decisions made about you. We do not currently carry out automated decision-making in connection with your employment, but we will notify you in advance if this changes.

3. What Kinds Of Personal Data Do We Use?

In the course of our working relationship with you, we will collect, store, and use the following categories of personal data about you:

- (a) Personal contact details such as name, job title, home addresses, telephone numbers, and personal email addresses.
- (b) Date of birth.
- (c) Gender.
- (d) Marital status and information about your dependants.
- (e) Next of kin and emergency contact information.
- (f) National Insurance number.
- (g) Bank account details, payroll records and tax status information.
- (h) Salary, annual leave, pension, and benefits information.
- (i) Employment start date.
- (j) Location of employment or workplace.
- (k) Identification information.
- (l) 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).
- (m) Employment records (including job titles, work history, working hours, training records and professional memberships).
- (n) Performance information.
- (o) Disciplinary and grievance information
- (p) CCTV footage and other information obtained through electronic means such as swipe card records.
- (q) Information about your use of our information and communications systems (including email).

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:

- (a) Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- (b) Trade union membership.
- (c) Information about your health, including any medical condition, health, and sickness records.
- (d) Genetic information and biometric data (for example, photographs and images captured by our CCTV system).
- (e) Information about your criminal convictions and offences (from, for example, checks from the Disclosure and Barring Service).

5. How We Gather your Personal Data

We may obtain your personal data in different ways:

- (a) directly from you, for example when you fill out an application;
- (b) during the application and recruitment process, from an employment agency or background check provider, your former employers and credit reference agencies;
- (c) from monitoring emails, internet, and telephone usage and when we use CCTV in line with our Acceptable Use Policy, Social Media Policy, and any CCTV notices at our premises.

6. How We Use your Personal Data

To summarise, we process your personal data for the following key purposes:

- (a) primarily, so that we can fulfil our contractual obligations and legal obligations to you as your employer (for example, to pay you and provide benefits to you) and to exercise our legal rights;
- (b) to comply with our legal obligations and regulatory requirements which we are subjected to as a company;
- (c) some processing may be required for the public interest (for example, the sharing of information (which may include your personal data) with law enforcement agencies may be required for national security purposes); and
- (d) 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).

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 Sensitive Personal Data

Special protection is given to certain kinds of personal data that is deemed by law to be particularly sensitive. This is information about your health status, racial or ethnic origin, political views, religious or similar beliefs, sex life or sexual orientation, genetic or biometric identifiers, and trade union membership.

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.

We may also process special categories of personal data about you for the following key purposes:

- (a) as necessary for the purposes of carrying out the obligations of being your employer (for example, our obligations to provide certain benefits to you may involve the processing of your health information) and to exercise our rights as your employer;
- (b) we may be required to process special categories of information about you in the establishment, exercise, or defence of legal claims (for example, in the context of an employment tribunal case or a personal injury claim); and

(c) for reasons of substantial public interest.

We may also be required to process information about any criminal convictions you may have when conducting background checks from the Disclosure and Barring Service.

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), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our staff). This can have consequences in terms of your continued employment with us.

9. Monitoring

It is sometimes necessary for us monitor our staff in various ways in order to ensure safety, security, and protect our staff. We monitor our staff in the following ways:

- (a) staff may be captured by CCTV systems: we use the personal data collected from CCTV systems for security and disciplinary purposes;
- (b) we require to conduct background checks, and these may be monitored and renewed on a regular basis;
- (c) monitoring use of company devices and email systems to ensure these are used appropriately and within company time, unless exceptional circumstances dictate;
- (d) monitoring website access;
- (e) monitoring when a member of staff has entered or tried to enter into a secure access area and at what time;
- (f) drug and alcohol testing;
- (g) equality monitoring.

We process personal data obtained through such monitoring in accordance with our Data Protection Policy and only carry these activities to the extent it is necessary and proportionate, and it is permitted by law (please see the Appendix for more information).

If you have any concerns in relation to monitoring, please speak to the Data Protection Officer.

10. Our Legal Basis for Using your Personal Data

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 table set out in the Appendix.

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 have no obligation to give consent if you are asked for it, and if you do give consent you may withdraw it at any time.

11. Sharing your Personal Data With Others

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 ever share your personal data to the extent needed for those purposes.

We share personal data for these purposes:

- (a) between Group companies, for example if you transfer from one company to another within the Group;
- (b) with government and regulatory bodies, such as the Civil Aviation Authority and the Information Commissioner's Office, where we have a legal obligation to do so (such as to comply with our statutory audit obligations or for the prevention and detection of crime); and
- (c) with external providers, such as payroll, pension administration, benefits provision, occupational health and IT services.

12. Data Retention

We will never retain your personal data for any longer than is necessary for the purposes we need to use it for. Our general data retention procedures are set out in our Data Retention Policy.

13 Transfers Outside the UK

We may need to transfer your personal data outside the UK to other 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 European Economic Area (**EEA**).

We will only transfer your personal information outside the EEA where either:

- (a) the transfer is to a country which the EU Commission has decided ensures an adequate level of protection for your personal information, or
- (b) we have put in place our own measures to ensure adequate security as required by data protection law. These measures include ensuring that your personal information is kept safe by carrying out strict security checks on our overseas partners and suppliers, backed by strong contractual undertakings approved by the relevant regulators, such as the EU style model clauses.

Under South Africa's Protection of Personal Information Act (POPIA)

The purpose of personal data transfers to our entities and Service Providers outside of South Africa is for the performance of the contract that we have with you.

Biocair will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and that no transfer of your Personal Data will take place to an organisation or a country unless there are adequate controls in place including the security of your data and other personal information.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Under China's Personal Information Protection Law (PIPL)

The purpose of personal data transfers to our entities and Service Providers outside of China is for the performance of the contract that we have with you.

Biocair will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and that no transfer of your Personal Data will take place to an organisation or a country unless there are adequate controls in place including the security of your data and other personal information.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Under Singapore's Personal Data Protection Act (PDPA)

The purpose of personal data transfers to our entities and Service Providers outside of Singapore is for the performance of the contract that we have with you.

Biocair will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and that no transfer of your Personal Data will take place to an organisation or a country unless there are adequate controls in place including the security of your data and other personal information.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

14. Right to Complain

You can make a complaint to us by contacting the Data Protection Officer at dataprotection@biocair.com or to the data protection supervisory authority – in the UK, this is the Information Commissioner's Office, at <https://ico.org.uk/>.

15. 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 or through an announcement posted on the Biocair intranet.

Last updated – 1st September 2022



APPENDIX

The information set out in the below table reflects the most common uses of employee personal data.

However, this list is not exhaustive.

	Purpose for Processing	Categories of Personal Data	Legal Basis
1	For the administration of your employment.	Full name, date of birth, job title, residential address, email address, telephone number, national insurance number, bank account information, trade union membership.	Performance of a contract and in performance of our obligations and exercise of our rights as your employer.
2	The recruitment and selection process.	Full name, date of birth, residential address, email address, telephone number, national insurance number, CV, employment history and background checks.	Pursuance of our legitimate interests.
3	Checking you are legally entitled to work in the UK.	Full name, date of birth, passport number.	Compliance with legal obligations.
4	Paying you and if you are an employee, deducting tax and NIC.	Full name, date of birth, national insurance number, bank account information.	Performance of a contract.
5	Conducting performance reviews, managing performance and determining performance requirements.	Full name, job details and performance information.	Pursuance of our legitimate interests to ensure staff are performing well, to help us address any performance issue for compliance with our obligations under our employment contract with you.
6	Making decisions about salary reviews and compensation.	Full name, job details, salary information and performance information.	Pursuance of our legitimate interests and to comply with our

			employment contract with you.
7	Recording health and safety incidents.	Full name, health information (as is relevant to the specific incident, such as injury sustained or any underlying health conditions).	Pursuance of our legitimate interests, in compliance with legal obligations, and as necessary to exercise our rights as your employer.
8	Pensions and benefits administration.	Full name, date of birth, residential address, national insurance number, pension scheme details. Some benefits may require us to process health information.	To comply with our legal obligations as an employer, to perform our contract with you which obliges us to provide you with certain benefits, although in many cases employees will provide this directly to the benefit provider and not to us.
9	Disciplinary matters, staff disputes, employment tribunals.	Full name, job details, performance information and information about the disciplinary matter.	To exercise our rights as an employer and possibly in the pursuit or defence of legal claims.
10	Staff training and development.	Full name	Compliance with legal obligations.

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