



RG & SSP

Employee Privacy Policy

(UK and Ireland based colleagues)

**This policy applies to
colleagues of SSP UK
& Ireland, RG and
SSP Group
colleagues based in
the UK**

Purpose and Scope

RG & SSP are committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you before, during and after your working relationship with us, in accordance with Data Protection Laws. For the purposes of this policy, "**Data Protection Laws**" means (as applicable to the entity processing your personal data), the EU General Data Protection Regulation (GDPR), the Irish Data Protection Act 2018, the UK Data Protection Act 2018, and any legislation that might replace the GDPR in the UK following its withdrawal from the EU).

The "controller" of your personal information shall be your employer/the entity contracting with you being, as applicable, RG or SSP.

Controllers under Data Protection Laws are responsible for deciding how we hold and use personal information about you. We are required under the Data Protection Laws to notify you of the information contained in this privacy notice.

This notice applies to prospective, current and former colleagues, workers and contractors. This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time.

Please note that for *prospective* colleagues, workers and contractors, the information we collect and the ways in which we use that information are likely to differ and we set out those differences below.

It is important that you read this notice, together with any other policies we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Principles

This policy and associated procedure incorporate the following principles.

- ✓ **Good faith**
The policy will be applied to all colleagues in a consistent manner and without discrimination.
- ✓ **Fairness**
Any action taken will be reasonable and necessary. Employees involved are entitled to be treated with courtesy and respect.
- ✓ **Confidentiality**
Information raised in line with this policy will only be shared with individuals who have a need to know.
- ✓ **Representation**
Should a colleague be invited to attend a formal meeting to discuss any concerns they are entitled to be accompanied by a representative.

Changes to This Privacy Notice

We reserve the right to update this privacy notice at any time. A copy of this privacy notice is always available at <https://www.foodtravelexperts.com/international/gdpr> or can be requested from the email address below. Where substantive updates are made, we will draw the latest version of the policy to your attention. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, whether you work within RG or SSP in the UK & Ireland please send an email to gdpr@ssp-intl.com.

Data Protection Principles

When processing your personal information, we will comply with Data Protection Laws. This says that the personal information we hold about you must be:

- ✓ Used lawfully, fairly and in a transparent way
- ✓ Collected only for valid purposes that we have explained to you, for example as set out in this policy, and not used in any way that is incompatible with those purposes
- ✓ Relevant to the purposes we have told you about and limited only to those purposes
- ✓ Accurate and kept up to date
- ✓ Kept only as long as necessary for the purposes we have told you about
- ✓ Kept securely

Personal Information

For the purposes of this privacy notice, personal data, or personal information, means any information about an identified or identifiable individual. It does not include data where we cannot identify the individual, whether looking just at that data or in conjunction with other data we hold / have access to. (anonymous data).

Information for prospective colleagues, workers and contractors

For applicants looking to work with our UK business, we may collect, store and use the following categories of personal information about you when you sign up via the "register your interest" page on our careers site:

- ✓ Name
- ✓ UK home address
- ✓ mobile number
- ✓ email address

We shall only use this information for the purposes of contacting you in the event that we have a role for which we would like you to apply. This information shall only be stored on our systems for 12 months, after which we shall delete such information. If you wish to continue to be considered for opportunities after this time, you will need to resubmit your information via the "register your interest" page on our careers site.

If we have a role we would like you to apply for, we may then ask for certain other personal information in connection with our recruitment process. This may include proof of right to work, preferences and other information included in a CV or cover letter or otherwise collected or provided as part of the application process, such as, where applicable, credit and background checks. We will only use this information as part of the recruitment process and in the event that you are not successful, we will either delete it or, if we think you may be suited for a similar role at a later date, keep it for 12 months so that we may contact you in the event that such a role becomes available, after which period it will be deleted. We will process this data in accordance with the rest of this privacy notice.

Please see the remainder of this privacy notice for further details of how we process your personal information and your rights in connection with that processing.

The Kind of Information We Hold About You

We may collect, store, and use the following categories of personal information 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/PPS number
- ✓ Bank account details, payroll records and tax status information
- ✓ Salary, annual leave, pension and benefits information
- ✓ Start date
- ✓ Location of employment or workplace
- ✓ Recruitment information (including proof of right to work, references and other information included in a CV or cover letter or otherwise collected or provided as part of the application process, such as credit and background checks)
- ✓ Employment records (including job titles, work history, working hours, training records and professional memberships)
- ✓ Compensation history
- ✓ Performance information
- ✓ Disciplinary and grievance information
- ✓ CCTV footage and other information obtained through electronic means such as swipe card records
- ✓ Leaver information (including resignation letters, leaving terms and arrangements, exit interview details and references)
- ✓ Information about your use of our information and communications systems
- ✓ Photographs

There are "special categories" of more sensitive personal data which require a higher level of protection.

We may collect, store and use the following "special categories" of more sensitive personal information:

- ✓ Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions
- ✓ Trade union membership

- ✓ Information about your health, including any medical conditions, health and sickness records
- ✓ Biometric data
- ✓ Information about criminal convictions and offences

How is your personal information collected?

We typically collect personal information about employees, workers and contractors 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 collect additional personal information in the course of job-related activities throughout the period of you working for us.

How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- ✓ Where we need to perform the contract we have entered into with you
- ✓ Where we need to comply with a legal obligation
- ✓ Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests
- ✓ Where we have obtained your consent to do so

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)
- ✓ Where it is needed in the public interest or for official purposes

Situations in which we will use your personal information

We need all the categories of information in the list above (see **The Kind of Information We Hold About You**) 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.

The most common situations in which we will process your personal information are listed below. Please note that, on occasion, we may need to process your information for other purposes and such processing shall take place only where we have a legal basis to do so, as set out above.

- ✓ Making a decision about your recruitment or appointment
- ✓ Determining the terms on which you work for us
- ✓ Checking you are legally entitled to work in the UK or Ireland
- ✓ Paying you and, if you are an employee, deducting tax and National Insurance/PPS contributions
- ✓ Where relevant, providing employee benefits to you
- ✓ Liaising with your pension provider
- ✓ Administering the contract we have entered into with you

- ✓ Business management and planning, including accounting and auditing
- ✓ Carrying out our ordinary business, such as providing your SSP or RG contact details to our business partners for you to fulfil your role or for them to be able to contact the business
- ✓ Conducting performance reviews, managing performance and determining performance requirements
- ✓ Making decisions about salary reviews and compensation
- ✓ Assessing qualifications for a particular job or task, including decisions about promotions
- ✓ Gathering evidence for possible grievance or disciplinary hearings
- ✓ Making decisions about your continued employment or engagement
- ✓ Making arrangements for the termination of our working relationship
- ✓ Education, training and development requirements
- ✓ Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work
- ✓ Ascertaining your fitness to work
- ✓ Managing sickness absence
- ✓ Complying with health and safety obligations
- ✓ To prevent fraud
- ✓ To monitor your use of our information and communication systems to ensure compliance with our IT policies
- ✓ To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution
- ✓ To conduct data analysis studies to review and better understand employee retention and attrition rates
- ✓ Equal opportunities monitoring
- ✓ To comply with our other legal obligations
- ✓ As part of steps we take or are required to take in connection with a national or global epidemic or pandemic (for example, Covid-19)
- ✓ In connection with an investigation or criminal proceedings
- ✓ To carry out steps at your request or with your consent, for example, transferring your details to another employer

Please note that the above processing shall take place on the basis of one or more of the legal bases above.

If You Fail to Provide Personal Information

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).

Change of Purpose

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, where possible, 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.

How We Use Sensitive Personal Information

"Special categories" of particularly sensitive personal information require higher levels of protection. Examples include information relating to racial or ethnic origin, trade union membership, health and religious beliefs and biometric information.

We need to have an additional basis for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

- ✓ In limited circumstances, with your consent
- ✓ Where we need to do so to carry out our obligations and exercise our rights in connection with your employment or in relation to social security and social protection law
- ✓ Dealing with legal disputes involving you, or other employees, workers and contractors
- ✓ Where it is needed in the public interest, such as for equal opportunities monitoring, in relation to our occupational pension scheme or in connection with a health epidemic or pandemic
- ✓ 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 in relation to other legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent (for example if you were to fall seriously ill at work and we needed to provide information to medical advisers when you were unable to do so), or where you have already made the information public.

As set out above, we may use certain of your "special category" personal information in the following ways:

- ✓ We will use information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other law
- ✓ 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
- ✓ We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting
- ✓ We will use trade union membership information to pay trade union premiums, register the status of a protected employee and to comply with employment law obligations
- ✓ We may use criminal offence data revealed through your employment checks in order to ascertain your suitability for a certain role with us or one of our business partners
- ✓ We may use certain information relating to your health as part of our obligations as an employer during health crises, including national epidemics and global pandemics such as Covid-19

Do We Need Your Consent?

We do not need your consent if we use special categories of your personal information in accordance those bases set out above.

In limited circumstances, we may approach you for your written consent to allow us to process certain other "special category" data. If we do so, we will provide you with further 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 from us for consent.

Information About Criminal Convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our data retention policy and other existing policies.

Less commonly, we may use information relating to criminal convictions in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and where you are not capable of giving your consent, or where you have already made the information public.

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we may collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of you working for us.

Automated Decision-Making

We do not envisage taking any decisions about you using automated means, however we will notify you in writing if this position changes.

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

- ✓ Where we have notified you of the decision and given you 21 days to request reconsideration.
- ✓ Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.
- ✓ In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

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.

Data Sharing

In connection with your role and our business processes, we may need to share your data with third parties, including third-party service providers, other group companies and our business partners.

We require third parties to respect the security of your data and to treat it in accordance with the law.

In certain circumstances and where we have taken appropriate steps under Data Protection Laws, we may transfer your personal information outside the UK or the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

Why might you share my personal information with third parties?

We may share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents) and other entities within our group.

The following activities are carried out by third-party service providers:

- ✓ Payroll
- ✓ Pension administration
- ✓ Benefits provision and administration
- ✓ IT services
- ✓ Reference, background and right-to-work checks

How secure is my information with third-party service providers and other entities in our group?

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers 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.

When might you share my personal information with other businesses in the group?

We will share your personal information with other businesses in our group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, to carry out certain services in connection with your employment, including to administer employee share plans, and for system maintenance support and hosting of data.

What about other third parties?

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 the law.

Transferring information outside the EU

We may transfer the personal information we collect about you to other countries outside the UK or EU where:

- that country has been deemed by a competent authority under Data Protection Laws to ensure an adequate level of protection to personal data;
- that transfer is made pursuant to an appropriate safeguard as set out in Data Protection Laws;
- that transfer is made pursuant to a derogation set out in the Data Protection Laws, including where:
 - you have given your explicit consent;
 - it is necessary for the performance of or to enter into a contract with you or made in your interest; or
 - it is necessary to establish, exercise or defend a legal claim.

To ensure that your personal information receives an adequate level of protection, we have put in place appropriate measures to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection.

Where we transfer your personal data to a group company located in a country outside the UK or EU (as applicable), and such country has not be deemed adequate under Data Protection Laws, such transfer shall be made pursuant to the European Commission approved model clauses, copies of which can be found [here](#).

Data Security

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

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. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data Retention

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected or require it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Details of retention periods for different aspects of your personal information are available in the RG & SSP retention policies.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such anonymised information without further notice to you. Once you are no longer an employee, worker or contractor of the company we will retain and securely destroy your personal information in accordance with the RG & SSP data retention policies and applicable laws and regulations.

Your Duty to Inform Us of Changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your Rights in Connection With Personal information

Under certain circumstances, and subject to some exceptions, in addition to the rights set out elsewhere in this privacy notice, 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 to continue processing it or retain it. You also have the right to ask us to stop processing personal information where we are relying on a legitimate interest and such processing overrides your interests, rights and freedoms.
- ✓ 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.
- ✓ Request the transfer of the personal information you have provided to us to another party in a machine-readable format.
- ✓ Lodge a complaint with a supervisory authority.

- ✓ Where relevant, request details of how to obtain a copy of the safeguards put in place in respect of transfers of your personal data outside the UK or EU (as applicable).

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please send an email to gdpr@ssp-intl.com (ex-colleagues) or hr.advisoryteam@ssp.uk.com (current colleagues).

No fee usually required

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.

What we may need from you

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 any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please send an email to gdpr@ssp-intl.com (ex-colleagues) or hr.advisoryteam@ssp.uk.com (current colleagues)

Once we have received and processed notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally consented to.