

Employee Privacy Notice

Scope and Overview

Brookson is committed to protecting the privacy and security of your personal data. This Privacy Notice describes how Brookson and its subsidiaries, group companies, affiliates, and related entities (collectively, "Brookson," "we," or "us") collect and process personal data about you during and after your employment. This Privacy Notice applies to current and former employees only. This privacy notice applies to employees located in the United Kingdom ('UK').

This Privacy Notice describes the categories of personal data that we collect, how we use your personal data, how we secure your personal data, when we may disclose your personal data to third parties, and when we may transfer your personal data outside of your home jurisdiction including the outside the European Economical Area, including but not limited to the United States of America. This Privacy Notice also describes your rights regarding the personal data that we hold about you including how you can access, correct, and request erasure of your personal data.

We will only process your personal data in accordance with this Privacy Notice unless otherwise required by applicable law. We take steps to ensure that the personal data that we collect about you is adequate, relevant, not excessive, and processed for limited purposes.

Collection of Personal Data

For the purposes of this Privacy Notice, personal data means any information about an identifiable individual. Personal data excludes anonymous or de-identified data that is not associated with a particular individual. To carry out our activities and obligations as an employer, we may collect, store, and process the following categories of personal data, which we require to administer the employment relationship with you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Gender.
- Marital and dependent status, only when needed to administer benefits such as health insurance or pension benefits.
- Beneficiary and emergency contact information.
- Government identification numbers such as social insurance or other national insurance number, driver's license number, or other identification card number.
- Bank account details and payroll information.
- Wage and benefit information.
- Compensation history.
- Performance information.
- Insurance and Pension enrollment information.

- Start date and job title.
- Location of employment.
- Education and training.
- Employment records (including professional memberships, references, work history, and proof of work eligibility).
- Photograph.
- Other personal details included in a CV, resume, application form or cover letter or that you otherwise voluntarily provide to us.

The personal data listed in this notice is mandatory in order for us to administer the employment relationship. Failure to provide or allow us to process mandatory personal data may affect our ability to accomplish the purposes stated in this Privacy Notice.

We will collect the majority of the personal data that we process directly from you. In limited circumstances third parties may provide your personal data to us, such as but not limited to official bodies (such as regulators or criminal record bureaus) or medical professional bodies.

Use of Personal Data

We only process your personal data where applicable law permits or requires it, including where the processing is necessary for the performance of our employment contract with you, where the processing is necessary to comply with a legal obligation that applies to us as your employer, for our legitimate interests or the legitimate interests of third parties, to protect your vital interests, or with your consent if applicable law requires consent. We may process your personal data for the following legitimate business purposes and for the purposes of performing the employment contract with you:

- Employee administration (including payroll and benefits administration).
- Business management and planning.
- Processing employee work-related claims (for example, insurance and worker's compensation claims).
- Accounting and auditing.
- Conducting performance reviews and determining performance requirements.
- Assessing qualifications for a particular job or task.
- Gathering evidence for disciplinary action or termination.
- Complying with applicable law.
- Education, training, and development requirements.
- Health administration services.
- Complying with health and safety obligations.

We will only process your personal data for the purposes we collected it for or for compatible purposes. If we need to process your personal data for an incompatible purpose, we will provide

notice to you and, if required by law, seek your consent. We may process your personal data without your knowledge or consent where required by applicable law or regulation.

We may also process your personal data for our own legitimate interests, including for the following purposes:

- To prevent fraud.
- To ensure network and information security, including preventing unauthorized access to our computer and electronic communications systems and preventing malicious software distribution.
- To support internal administration with our affiliated entities.
- To conduct data analytics analyses to review and better understand employee retention and attrition rates.

You will not be subject to decisions based on automated data processing without your prior consent.

Collection and Use of Special Categories of Personal Data

The following special categories of personal data are considered sensitive under the laws of your jurisdiction and may receive special protection:

- Racial or ethnic origin.
- Political opinions.
- Religious or philosophical beliefs.
- Trade union membership.
- Genetic data.
- Biometric data.
- Data concerning health.
- Data concerning sex life or sexual orientation.

Data relating to criminal convictions and offences may also receive special protection under the laws of your jurisdiction.

We may collect and process the following special categories of personal data when you voluntarily provide them for the following legitimate business purposes, to carry out our obligations under employment law, for the performance of the employment contract, or as applicable law otherwise permits:

- Trade union membership information for the purpose of paying trade union premiums.
- Physical or mental health information or disability status to comply with health and safety obligations in the workplace, to make appropriate workplace accommodations, as part of sickness absence monitoring, and to administer benefits.
- Race or ethnic origin, religious affiliation, health information and sexual orientation to ensure meaningful equal opportunity monitoring and reporting.

Where we have a legitimate need to process special categories of personal data for purposes not identified above, we will only do so only after providing you with notice and, if required by law, obtaining your prior, express consent.

We will always treat special categories of personal data as confidential and we will only share such data internally where there is a specific and legitimate purpose for sharing the data. We will only retain your personal data for as long as it is required for the correct processing and administration of your employment with us.

Data Sharing

We will only disclose your personal data to third parties where required by law or to our employees, contractors, designated agents, or third-party service providers who require such information to assist us with administering the employment relationship with you, including third-party service providers (for example but not limited to; ‘Zellis’ and ‘Dayforce’) who provide services to us or on our behalf. Third-party service providers may include, but are not limited to, payroll processors, benefits administration providers, and data storage or hosting providers. These third-party service providers may be located outside of your home jurisdiction and outside the European Economical Area.

We require all our third-party service providers, by written contract, to implement appropriate security measures to protect your personal data consistent with our policies and any data security obligations applicable to us as your employer. We do not permit our third-party service providers who process your personal data on our behalf to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes in accordance with our instructions.

We may also disclose your personal data for the following additional purposes where permitted or required by applicable law:

- To other members of our group of companies (including outside of your home jurisdiction) for the purposes set out in this Privacy Notice and as necessary to perform our employment contract with you.
- As part of our regular reporting activities to other members of our group of companies.
- To comply with legal obligations or valid legal processes such as search warrants, subpoenas, or court orders. When we disclose your personal data to comply with a legal obligation or legal process, we will take reasonable steps to ensure that we only disclose the minimum personal data necessary for the specific purpose and circumstances.
- To protect the rights and property of Brookson.
- During emergency situations or where necessary to protect the safety of persons.
- Where the personal data is publicly available.
- If a business transfer or change in ownership occurs and the disclosure is necessary to complete the transaction. In these circumstances, we will limit data sharing to what is absolutely necessary, and we will anonymize the data where possible.
- For additional purposes with your consent where such consent is required by law.

Cross-Border Data Transfers

Where permitted by applicable law, we may transfer the personal data we collect about you to the United States and other jurisdictions as necessary for the purposes set out in this Privacy Notice. As we anticipate that data will need to be transferred out of the EU, we have implemented specific safeguarding measures pertinent to Chapter 5 of the General Data Protection Regulations to secure the transfer of your personal data to the United States and other jurisdictions.

For the avoidance of doubt, Brookson engage with third party companies to ensure specific safeguarding measures are in place for the correct administration of your employment. At the date of publication, Brookson engage with the following Non Cross-Boarder and Cross-Boarder companies (not limited to and subject to amendment/update);

- Dayforce, Inc.
- Zellis UK Limited
- People 2.0 Inc.

Whenever we transfer your personal data out of the UK to service providers, we ensure a similar degree of protection is afforded to it by ensuring that the following safeguards are in place.

If you would like to know more or would like an up-to-date list of all third party companies who Brookson engage with to ensure the correct administration of your employment, please contact DPO@Brookson.co.uk who will be able to provide you with this information. Should you require, DPO@Brookson.co.uk will also be able to provide you guidance on how to access the specific third party privacy notices.

Data Security

We have implemented appropriate physical, technical, and organizational security measures designed to secure your personal data against accidental loss and unauthorized access, use, alteration, or disclosure. In addition, we limit access to personal data to those employees, agents, contractors, and other third parties that have a legitimate business need for such access.

Data Retention

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, as required to satisfy any legal, accounting, or reporting obligations, or as necessary to resolve disputes. To determine the appropriate retention period for personal data, we consider applicable legal requirements, the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes we process your personal data for, and whether we can achieve those purposes through other means. We specify the retention periods for your personal data in our data retention policy.

Under some circumstances we may anonymize your personal data so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent. Once you are no longer an employee of the company, we will retain and securely destroy your personal data in accordance with our document retention policy and applicable laws and regulations.

Rights of Access, Correction, Erasure, and Objection

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your employment. By law you may have the right to request access to, correct, and erase the personal data that we hold about you, or object to the processing of your personal data under certain circumstances. You may also have the right to request that we transfer your personal data to another party. If you want to review, verify, correct, or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact us at DPO@Brookson.co.uk . Any such communication must be in writing.

We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the personal data that we hold about you or make your requested changes. Applicable law may allow or require us to refuse to provide you with access to some or all of the personal data that we hold about you, or we may have destroyed, erased, or made your personal data anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your personal data, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

Right to Withdraw Consent

Where you have provided your consent to the collection, processing, or transfer of your personal data, you may have the legal right to withdraw your consent under certain circumstances. To withdraw your consent, if applicable, contact us at DPO@Brookson.co.uk.

Data Protection Officer

We have appointed a Data Protection Officer to oversee compliance with this Privacy Notice. If you have any questions about this Privacy Notice or how we handle your personal data, or would like to request access to your personal data, please contact the Data Protection Officer at: DPO@Brookson.co.uk . If you are unsatisfied with our response to any issues that you raise with the Data Protection Officer, you may have the right to make a complaint with the data protection authority in your jurisdiction by contacting the data protection authority.

Changes to This Privacy Notice

We reserve the right to update this Privacy Notice at any time, and we will provide you with a new Privacy Notice when we make any updates. If we would like to use your previously collected personal data for different purposes than those we notified you about at the time of collection, we will provide you with notice and, where required by law, seek your consent, before using your personal data for a new or unrelated purpose. We may process your personal data without your knowledge or consent where required by applicable law or regulation.

Contact Us

If you have any questions about our processing of your personal data or would like to make an access or other request, please contact us at: DPO@Brookson.co.uk.

Effective Date: June 2024