

STAFF (INCLUDING CONSULTANTS) PRIVACY NOTICE

Why do we have this privacy notice?

We are Likewise Group Plc and treating individuals and their personal information with respect reflects our core values and the values of our brand. So, we want you to know as much as possible about what we do with your personal information. Also, you and your personal information are protected by various laws and guidance and Likewise Group Plc is committed to upholding these and respecting your privacy and keeping your information safe. So, whilst this privacy notice is quite long, we want you to be fully informed. Please note while you read it, that not all parts of this privacy notice may apply to you depending upon the nature of your role with us.

In this privacy notice any reference to "Likewise Group", "us", "we", "our" or "ourselves" is a reference to Likewise Group Plc, and the particular part of the Likewise group that you work for and any reference to "you", "your" and "yourself" is a reference to you as a member of our staff or someone working for us.

This privacy notice applies to all current and past staff of or workers for Likewise Group Plc. You may be working for us as one of our staff as an employee, director, temporary worker, or consultant. This privacy notice provides details in accordance with data protection laws about how we collect and use personal information about you during and after your working relationship with us. However, if this privacy notice does not apply to you, then you would be covered by our Rest of the World privacy notice. See our website at www.likewiseplc.com for more details.

Please note that we have a separate privacy notice that relates to personal information captured by our CCTV and Access Control systems. A copy can be found at www.likewiseplc.com. We have a separate privacy notice that applies to our customers and potential customers, a copy of which can be found at www.likewiseplc.com, so, this will apply if you purchase products from us, add yourself to our marketing database, or enter any of our promotions/competitions. We also have a separate Recruitment privacy notice that applies to anyone who applies or has applied to work for us, a copy of which can be found at www.likewiseplc.com. Finally, we have a separate Rest of the World privacy notice that applies to any other individual that may interact with us, a copy of which can be found at www.likewiseplc.com and this covers everyone else including people who have a business relationship with us. You should also read these privacy notices to the extent that they will apply to your activities as they may apply to you in addition to this privacy notice.

The controller of your personal information

For the purposes of data protection laws and this privacy notice, we are the controller of your personal information for the processing of your personal information. Being a controller of your personal information means that we are responsible for deciding how we hold and use your personal information. Our corporate details are Likewise Group Plc (registered number 08010067), which is incorporated in England and Wales with its registered office at Unit 4 Radial Park, Solihull Parkway, Birmingham Business Park, Solihull, England, B37 7YN. If you have any queries regarding your personal information these will be dealt with by our DCO at DCO@likewiseplc.com.

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.

What if you do not provide personal information?

You have some obligations under your arrangements with us to provide us with personal information. In particular, you are required to report absences from work and may be required to provide information about disciplinary or other matters. You may also have to provide us with information in order to exercise your statutory rights, such as in relation to statutory leave entitlements. Failing to provide some of the personal information may mean that you are unable to exercise your statutory rights.

Certain information, such as contact details, your right to work in the UK and payment details must be provided to enable us to enter a working relationship with you. If you do not provide other information, this will hinder our ability to administer the rights and obligations arising as a result of our relationship with you efficiently.

If you have queries or concerns just ask!

We are not required to appoint a data protection officer to oversee our compliance with the data protection laws, however, we have appointed a data compliance officer (DCO) to do this. If you have any questions about this privacy notice or how we handle your personal information, please contact our DCO on DCO@likewiseplc.com.

Changes to this notice

We keep our privacy notice under regular review, and we may update this privacy notice at any time. The current version of this notice is available on www.likewiseplc.com and by requesting a copy from DCO@likewiseplc.com. If there are any material changes to this privacy notice in the future, we will let you know.

Data protection principles

We are committed to being transparent about how we collect and use your personal information and in meeting our data protection obligations. Data protection laws say 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 clearly explained to you 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.

To make sure this happens we are required under data protection laws to notify you of the information contained in this privacy notice. It is important that you read this document before you begin your working relationship with us, and at regular intervals, so that you understand how and why we will process your personal information.

What personal information do we collect?

As staff or workers for us, we collect and process a wide range of personal information about you. This may include:

- Personal contact details such as name, title, address, email address and telephone number(s).
- Information about your date of birth, age, gender, marital status, referees, next of kin, beneficiaries, dependants, family members and emergency contacts.
- Bank account details, payroll records, national insurance number, tax records/status information and other tax or governmental identifiers.
- Information about your remuneration, including bonuses, entitlement to benefits such as pensions or insurance cover.
- The terms and conditions relating to you working for us.
- Any communications between ourselves and you.
- Details of your schedule (days of work and working hours) and attendance at work.
- Details of periods of leave taken by you, including holiday, family leave and sabbaticals, and the reasons for the leave.

- Identification information including your driving license and/or passport and background checks.
- Recruitment information including information about your nationality and entitlement to work in the UK, references, CVs, application information, experience, reasons for leaving previous positions (see our separate. Recruitment of Staff (including Consultants) privacy notice at www.likewiseplc.com).
- Work records including your qualifications, skills, experience, working hours, location of workplace, promotions, work titles, performance information including that generated through our appraisal systems, performance reviews, performance improvement plans, training records and professional memberships, attendance at events, start and end dates and reasons for leaving us.
- Vehicle registration number make and model.
- Details of any disciplinary or grievance or performance related procedures in which you have been involved, including any warnings issued to you and related communications.
- CCTV footage in and around our premises and other information obtained through electronic means such as swipe card records and access control systems (see our separate CCTV and Access Control privacy notice at www.likewiseplc.com).
- CCTV footage captured inside and outside of our commercial vehicles (see our separate CCTV and Access Control privacy notice at www.likewiseplc.com).
- Information about your use of our information and communications systems and equipment/devices, whether used remotely or at our offices.
- Photographs, video footage and audio recordings.
- Results of HMRC employment status check, details of your interest in and connection with any intermediary through which your services are supplied.
- Information from Companies House or needed for Companies House purposes.
- Shareholding, options, stock appreciation rights, dividend entitlements and investments you hold where relevant.
- Any loans that you have made to us or we have made to you.
- Any other personal information you provide to us.

We may also collect and process more sensitive special category personal information including:

- Information about your health including any medical condition, health, and sickness records, including:
 - where you have a disability or medical condition for which we need to make reasonable adjustments.
 - where you stop working for us and the reason for leaving is determined to be ill-health, injury, or disability including any records relating to that decision.
 - details of any absences (other than holidays from work) including time on statutory parental leave and sick leave and the reasons for those absences.
 - information about your health in the context of providing you with benefits as part of your remuneration, for example health insurance.
 - where you stop working for us and the reason for leaving is related to your health, information about that condition may be needed for pensions and permanent health insurance purposes.

- Equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or beliefs.
- In cases where it is relevant, we may also collect criminal records information about you, for example points on a driving licence where we need to ensure you are insured to drive any of our vehicles, or an offence committed by you or alleged to have been committed by you impacts on you working for us.

If you are providing us with details of referees, next of kin, beneficiaries, dependants, family members and emergency contacts they have a right to know and to be aware of what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in this privacy notice in relation to their personal information that we collect.

Where do we collect your personal information from?

We collect your personal information in a variety of ways and from a variety of sources.

- Most of your personal information is collected directly from you, for example through application forms, CVs or resumes; from your passport or other identity documents such as your driving licence; from forms completed by you at the start of or during your time working for us (such as benefit nomination forms); from correspondence with you; or through interviews, meetings, or other assessments, when you visit our premises or other personal information you provide to us.
- Third parties such as organisations you have worked for in the past, referees whose details you provide to us, recruitment agencies, temporary worker agencies, recruitment websites or platforms, Companies House, professional or trade organisations.
- In the course of you carrying out your work-related activities or social activities linked to working for us, so your personal information may be collected by other individuals who work for or represent us.
- From our information technology and communications systems, access control systems and CCTV and suppliers we use in connection with them.
- From the internet and social media and other public sources.
- From third parties appointed by you, for example any financial or legal advisors.
- From benefit providers, for example a pension provider or an insurance provider.
- From third parties appointed by us, for example a financial or legal advisor appointed by us or a background check provider that we use.
- From government or government related bodies, regulators, the police, law enforcement authorities or the security services.

We store personal information relating to you in a range of different places, including in your personnel file, in our people management systems and in other information technology systems (including our email system).

What are our bases for processing your personal information?

We will only use your personal information when the law allows us to. This means we must have one or more legal bases to use your personal information. Most of these will be self-explanatory. The most common legal bases which will apply to our use of your personal information are set out below:

- Where we need to perform the contract, we have entered into with you which covers your working relationship with us or to take steps to enter into that contract.
- Where we need to comply with a legal obligation which applies to us, for example paying tax on your remuneration or complying with health and safety laws or making filings at Companies House.

- Where it is necessary for legitimate interests pursued by us or a third party and your interests and fundamental rights do not override those interests. We have set out in the section below how we use your personal information more together with details on our legitimate interests.
- Where you have given your consent. Generally, we do not rely on or need your consent for almost all uses we make of your personal information.

Where we are processing any sensitive special category personal information about you (which covers personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation) we also need to have one or more of the following legal bases for using your personal information.

- Where we have your explicit consent to do so, for example, to process your medical information to provide you with health insurance as a benefit as part of your remuneration.
- Where it is necessary for us to comply with our obligations and exercising our rights in the field of employment law, social security law and social protection law.
- Where we need to protect your vital interests (or someone else's vital interests).
- Where you have already made public the personal information.
- In establishing, exercising, or defending legal claims, whether those claims are against us or by us.
- Where it is necessary in the public interest.

We will not process all of these types of special category personal information about you, and in cases where we do process special category personal information about you it will generally be to comply with legal obligations, where you have given your consent or to establish, exercising or defending legal claims. In some cases, more than one legal basis may apply to our use of your personal information, so, for example, you may be entitled in your contract to a pension contribution and, we may have a legal obligation to provide you with a pension.

How will we use your personal information?

There are many ways we will need to use your personal information during and after the end of our working relationship with us. We have set out the main uses below, and indicated the main applicable legal bases of processing, but there may be other specific uses which are linked to or covered by the uses below.

- We will process your personal information to enter into working relationship with you and to meet our obligations under that relationship and to enforce our rights. For example, we need to process your personal information to provide you with a contract, decide what terms will apply to you, to pay you and to administer any benefit, pension, and insurance entitlements you have. As well as relating to a contract with you either directly or indirectly, this will also be in our legitimate interests. We may also in some limited cases rely on your consent.
- We also need to manage our relationship with you, which may involve appraisals, performance monitoring, disciplinary processes, complaint processes, communications with you, workforce management, decisions regarding promotions, career development, training needs, remuneration, benefits, and bonuses and any end to our working relationship. As well as relating to a contract with you either directly or indirectly, this will also be in our legitimate interests.
- As a business we have many legal obligations connected to your working for us or working at our premises which we need to comply with, for example, checking entitlement to work in the UK, to deduct tax, to comply with health and safety laws, to comply with data protection laws, to ensure you receive the pay or other benefits to which you are entitled, to ensure equality and equal opportunities in our business, to make Companies House filings, to enable you to take periods of leave to which you are entitled or to invoke other legal rights.

- We will also need to keep and maintain proper records relating to your relationship with us, the work you carry out for us and information about you which is relevant to the role you have with us. As well as relating to a contract with you either directly or indirectly, this will also be in our legitimate interests, and we may also have legal obligations to do this.
- In some cases, we may need to process your personal information to prevent, detect or prosecute criminal activity. This will also be in our legitimate interests; we may have legal obligations or be exercising a legal right to do this, and it will also be in the public interest.
- We may need to gather evidence for and be involved in possible grievance or disciplinary proceedings or legal cases. As well as relating to a contract with you either directly or indirectly, this will also be in our legitimate interests, we may also have legal obligations or be exercising a legal right to do this and it may also be needed to establish, bring, or defend legal claims.
- To manage and keep a record of absence and to manage absence management procedures including fitness to work and sickness absences, to allow effective workforce management and ensure that staff are receiving the pay or other benefits to which they are entitled. As well as relating to a contract with you either directly or indirectly, this will also be in our legitimate interests, and we may also have legal obligations or be exercising a legal right to do this.
- Operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to allow effective workforce management to ensure that we comply with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled. As well as relating to a contract with you either directly or indirectly, this will also be in our legitimate interests, and we may also have legal obligations or be exercising a legal right to do this.
- Ensure effective general human resources and business administration and to manage our business. As well as relating to a contract with you either directly or indirectly, this will also be in our legitimate interests, and we may also have legal obligations or be exercising a legal right to do this.
- Provide references on request for current or former employees. As well as relating to a contract with you either directly or indirectly, this will also be in our legitimate interests, and we may also have legal obligations or be exercising a legal right to do this.
- Monitor your use of our information and communication systems to ensure compliance with our IT policies, ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution and use of social media. As well as relating to a contract with you either directly or indirectly, this will also be in our legitimate interests, and we may also have legal obligations or be exercising a legal right to do this. In relation to social media, you may also have already made the personal information public.
- We may need to process your personal information to help train our staff, and make sure they deliver the high standards expected in relation to our brand. This will be in our legitimate interests.
- Conduct data analytics studies to review and better understand staff retention and attrition rates and other trends in our workforce. This will also be in our legitimate interests, and we may also have legal obligations or be exercising a legal right to do this. We may anonymise and aggregate personal information for insight and research purposes, but this information will not identify you.

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, 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 will rarely need to rely on your consent to process any of your personal information.

Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision about that person without any human intervention. We do not currently use automated decision-making in our business in relation to our workforce.

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.

Who has access internal to your personal information?

Your personal information may be shared internally with certain teams, including finance for payroll processing and our HR team for staff administration matters, your line manager, managers in the business area in which you work, the technology or legal teams where access to your personal information is necessary for the performance of their roles. We only provide access to your personal information to those of our staff who need to have access to your personal information.

Who do we share your personal information with externally?

When using your personal information, we may share it with third parties, but we will only do so when it is appropriate, and we have a legal basis for doing so. Third parties that we may share your personal information with include:

- Any third party approved by you.
- Customers of our business where it is appropriate to do so, usually when you are in contact with them.
- Your past employers, your referees, or future new employers to obtain references from other employers or to provide references for you.
- Service or product providers to our business or you, for example payroll, pension providers, pension administration, benefits providers, insurance providers, occupational health providers, training providers, banks, contractors, maintenance or administration providers, information technology services suppliers and background check providers.
- Third parties that process personal information on our behalf and in accordance with our instructions.
- Another company within our group of companies.
- Purchasers, investors, funders, and their advisers if we sell all or part of our business, assets or shares or restructure whether by merger, re-organisation or in another way.
- Our legal and other professional advisers, including our auditors or any professional advisors appointed by you, for example a pensions advisor or legal advisor.
- Governmental bodies, HMRC, regulators, police, law enforcement agencies, security services, courts/tribunals.
- People who have been injured, attacked, or had property damaged or stolen and their insurance providers to assist them with any criminal or civil investigations or legal proceedings.
- People who have been involved in road traffic accidents and their insurance providers: to assist with insurance claims, legal claims, and investigations.

International transfers

It is sometimes necessary to share your personal information outside of the UK and the European Economic Area (the EEA) or it will be collected outside of the UK and the EEA. This will typically occur when service providers to our business are located outside the EEA or if you are based outside the EEA. These transfers are subject to special rules under data protection laws.

The same applies to any transfer of personal information to another part of our group of companies based outside of the UK and the EEA. We also apply the same standards to any transfer of personal information between members of our group, regardless of where the group company is based.

If we transfer your personal information outside of the UK and the EEA, we will ensure that the transfer will be compliant with data protection laws and all personal information will be secure. Our standard practice is to assess the laws and practices of the destination country and relevant service provider and the security measures that are to be taken as regards the personal information in the overseas location; alternatively, we use standard data protection clauses. This means that when a transfer such as this takes place, you can expect a similar degree of protection in respect of your personal information.

Our directors and other key staff working for us may, in limited circumstances, access personal information from outside of the UK and EEA if they are on holiday abroad outside of the UK or EEA. If they do so they will be using our security measures and the same legal protections will apply that would apply to accessing personal information from our premises in the UK.

In limited circumstances the people to whom we may disclose personal information may be located outside of the UK and EEA and we will not have an existing relationship with them, for example a foreign police force. In these cases, we will impose any legally required protections to the personal information as required by law before it is disclosed.

If you would like any more details about how we protect your personal information in relation to international transfers, then please contact our DCO at DCO@likewiseplc.com.

How do we protect your personal information?

We are committed to keeping your personal information safe and secure and so we have numerous security measures in place to protect against the loss, misuse, and alteration of information under our control. Our security measures include:

- Encryption of personal information where appropriate.
- Regular cyber security assessments of all service providers who may handle your personal information.
- Regular planning and assessments to ensure we are ready to respond to cyber security attacks and data security incidents.
- Regular penetration testing of systems.
- Security controls which protect our information technology systems infrastructure and our premises from external attack and unauthorised access.
- Aiming to use best in class security systems implemented across our networks and hardware to ensure access and information are protected.
- Regular backups of information technology systems data with functionality to correct errors or accidental deletion/modification to data.
- Internal policies setting out our information security rules for our staff.
- Regular training for our staff to ensure staff understand the appropriate use and processing of personal information.
- Where we engage third parties to process personal information on our behalf, they do so on the basis of our written instructions, they are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of personal information.

We take information security very seriously and will use all reasonable endeavours to protect the integrity and security of the personal information we collect about you.

How long do we keep your personal information?

We will hold your personal information for the duration of your working relationship with us and after the end of your working relationship with us as detailed in our Data Retention Policy.

We will not retain your personal information for longer than necessary for the purposes for which it was collected and for which it is being used. Different retention periods apply for different types of personal information, and our Data Retention Policy sets out the length of time we will usually retain personal information and where these default periods might be changed. Generally, of thumb, we will retain most of your personal information for up to 7 to 12 years after the end of your working relationship with us. However, some shorter and longer periods will apply to certain types of personal information. We do not guarantee to retain your personal information for the whole of the periods set out in our Data Retention Policy, they are usually the maximum period.

For more information, please see our Data Retention Policy which can be found within www.likewiseplc.com or obtained from our DCO at DCO@likewiseplc.com.

Your rights

As an individual whose personal information we collect and process, you have a number of rights. You may:

- Withdraw any consent you have given to us, although this will only be relevant where we are relying on your consent as a basis to use your personal information, but it is an absolute right. Once we have received notification that you have withdrawn your consent, we will no longer process your personal information for the purpose or purposes to which you originally gave your consent, unless we have another legal basis for doing so.
- Request details about how your personal information is being used. This right is linked with the right of access mentioned below.
- Request access and obtain details of your personal information that we hold (this is 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 erasure of your personal information. This means that you can ask us to delete or stop processing your personal information, for example where we no longer have a reason to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (set out below). The right to have data erased does not apply in all circumstances.
- Object to the processing of your personal information where we are relying on a legitimate interest (ours or that of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- Object to direct marketing where we are processing your personal information for direct marketing purposes. This is an absolute right but is not directly relevant to you as a member of our staff.
- Request the restriction of processing of your personal information. This enables you to ask us to stop processing your personal information for a period if it is inaccurate or there is a dispute about whether or not your interests override our legitimate grounds for processing your personal information.
- Request the transfer of your personal information to another party in certain circumstances.
- Object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your personal information to another service provider or the right to object to automated decision-making, may not

always apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision-making in relation to your personal information. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

If you would like to exercise any of these rights, please contact our DCO at DCO@likewiseplc.com.

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), especially if you are a past member of our staff. This is another appropriate security measure to ensure that personal information is not disclosed to any person or dealt with by a person who has no right to do so.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a complex area of law. More information about your legal rights can be found on the ICO's website at <https://ico.org.uk/for-the-public/>.

Complaints

We hope you don't have any reason to complain, and we will always try to resolve any issues you have, but you always have the right to make a complaint at any time to the ICO if you are based in the UK about how we deal with your personal information or your rights in relation to your personal information. If you are based outside of the UK, you may have the right to complain to your local data protection regulator.

You can make a complaint in writing to the ICO, Wycliffe House, Water Lane, Wilmslow, SK9 5AF, United Kingdom or you can go to <https://ico.org.uk/make-a-complaint/>.

Contacting us

If you have any queries regarding our use of your personal information or this privacy notice then please contact our DCO at DCO@likewiseplc.com or write to DCO, Likewise Group Plc, Unit 4, Radial Park, Solihull Parkway, Birmingham, B37 7YN. You can use these details regardless of which of our group companies you are working for or used to work for.