

EMPLOYEE PRIVACY NOTICE

1 Introduction

BAI Communications Ltd ("we", "us" and "our") is a private limited company registered in the United Kingdom at Level 4, 4 Kingdom Street, London, United Kingdom, W2 6BD (Registration no. 10090890).

References to "you" means any of our current or former employees, officers, directors, contractors, agents, consultants or agent workers based in the European Economic Area ("EEA") or based outside the EEA but where your Personal Data (as defined below) is processed in the context of any of our establishments in the EEA. References to "you" will also include, where relevant, any dependants or other individuals about whom you provide Personal Data in connection with your relationship with us for employee management reasons, such as for emergency contact or employee benefit purposes.

We are a "controller" for the purposes of the General Data Protection Regulation 2016/679 ("GDPR"). We are committed to protecting your privacy and processing your Personal Data fairly and lawfully in compliance with the GDPR.

By "processing", we mean the collection, recording, storage, use, disclosure and any other form of operations or dealings with your Personal Data.

During your employment with us, we may need to gather and use "Personal Data" about you, by which we mean any information about you from which you can be identified. The purpose of this Privacy Notice ("Privacy Notice") is to inform you of how we will process your Personal Data and the measures and processes we have put in place to ensure its adequate protection.

This notice does not form part of your contract of employment, and we may amend it from time to time.

2 Fair and Lawful Processing

We will only process Personal Data about you where the processing is necessary:

- a) to manage our business and operations;
- b) to provide employee benefits to you;
- c) for our legitimate interest or those of any third-party recipients that receive your Personal Data (as detailed at clauses 5 and 7 below); and/or
- d) to comply with our legal obligations.

We may also process certain Personal Data about you where you have given us your express consent to do so (which you may withdraw at any time, as detailed at clause 9 below).

3 What Personal Data we collect about you

3.1 We typically process the following types of Personal Data about you

- a) Personal details, such as name, address, date of birth, marital status, emergency contact details, country of residence, national insurance number, salary, bank details, PAYE and tax related details;
- b) Professional details, such as your work contact details, CV, details of your qualifications, relevant experience and skills;

- c) Identification documentation, such as copies of your passport, driving licence, national or work ID card, or other documentation required by law (which may include photographs of your face and shoulders);
- d) HR-related records, such as training, appraisals/performance assessments, absence and time-keeping records, disciplinary, grievance or capability proceedings, equal opportunities data, references and background checks; and
- e) Details of your access to our premises and to systems, software, websites, and applications including access and location data and communications data.

3.2 We make every effort to maintain the accuracy and completeness of your Personal Data which we store and to ensure all of your Personal Data is up to date. However, you can assist us with this considerably by promptly contacting us if there are any changes to your Personal Data or if you become aware that we have inaccurate Personal Data relating to you (see clause 9 below). We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete Personal Data that you provide to us.

4 How we collect Personal Data

We usually collect your Personal Data from the information you submit during the course of your relationship with us or our group companies. This will typically be done when you apply for a job with us, join us as an employee, make any amendments to your personal details via our office intranet or by notifying us.

5 How we use Personal Data

We will process your Personal Data in connection with the management of our relationship with you, for the following purposes:

- a) for general HR administration, including payroll, PAYE and benefits, training and development, performance management, sickness and absence management, emergency contact, grievance and disciplinary procedures, equal opportunities monitoring and business continuity planning;
- b) for internal finance management, including personnel expense reimbursement, travel and time-keeping;
- c) for monitoring and assessing compliance with our policies and standards, as well of those of our customers and/or other BAI contracted bodies;
- d) for administrative purposes in relation to the security and access of our systems, premises, platforms and secured websites and applications;
- e) to consider your suitability for any of our current or future employment opportunities and to confirm your references, character and educational background;
- f) to comply with our legal and regulatory obligations and requests anywhere in the world, including reporting to and/or being audited by national and international regulatory, enforcement or exchange bodies;
- g) to comply with court orders and exercise and/or defend our legal rights;
- h) for any other legitimate business purpose; and
- i) as otherwise permitted or required by any applicable law or regulation.

6 International Transfers of Personal Data

The Personal Data we collect in connection with your employment may be transferred to (including accessed in or stored in) a country or territory outside the European Economic Area ("**EEA**"), including to countries whose laws may not offer the same level of protection of Personal Data as are enjoyed within the EEA. We will ensure that any

such international transfers are made subject to appropriate or suitable safeguards as required by the GDPR. Copies of the relevant safeguard documents are available by contacting us at the details provided below.

7 Who else might receive your Personal Data

We do not and will not sell, rent out or trade your Personal Data. We will only disclose your Personal Data in the ways set out in this notice and, in particular, to the following recipients:

- a) to one of our group companies (including those outside of the EEA);
- b) to third parties who process your Personal Data on our behalf (such as our payroll provider or other systems providers including cloud providers);
- c) to third parties who process your Personal Data on their own behalf but in connection with a service provided to us or you on our behalf (such as industry event organisers, pension providers, background check providers or third parties from whom we request a reference);
- d) to companies providing services for money laundering checks, police record checks, credit risk reduction and other fraud and crime prevention purposes and companies providing similar services, including financial institutions, credit reference agencies and regulatory bodies with whom such information is shared;
- e) to any third party to whom we assign or novate any of our rights or obligations;
- f) to any prospective buyer in the event we sell any part of our business or assets; and/or
- g) to any government, regulatory agency, enforcement or exchange body or court where we are required to do so by applicable law or regulation or at their request.

8 How we protect your Personal Data

We are committed to safeguarding and protecting Personal Data and will implement and maintain appropriate technical and organisational measures to ensure a level of security appropriate to protect any Personal Data provided to us from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to Personal Data transmitted, stored or otherwise processed. Please see our Information Security Policy which is located on our Policy Portal website.

9 Your rights in relation to the Personal Data we collect

9.1 If you wish to:

- a) update, modify, delete or obtain a copy of the Personal Data that we hold on you; or
- b) restrict or stop us from using any of the Personal Data which we hold about you,

you can request this by emailing us at the address set out in clause 12 below. We endeavor to respond to such requests within a month or less, although we reserve the right to extend this period for complex requests.

9.2 In any of the situations listed above, we may request that you prove your identity by providing us with a copy of a valid means of identification for us to comply with our security obligations and to prevent unauthorised disclosure of data.

9.3 We reserve the right to charge you a reasonable administrative fee for any manifestly unfounded or excessive requests concerning your access to your Personal Data, and for any additional copies of the Personal Data you request from us.

10 How long we will hold your Personal Data for

We will only retain your Personal Data for as long as necessary to fulfill the purpose for which it was collected or to comply with legal, regulatory or internal policy requirements.

11 How we update or change this Privacy Notice

We may change or update parts of this Privacy Notice in order to maintain our compliance with applicable law and regulation or following an update to our internal practices. We will do this by updating this Privacy Notice on the BAI website. You will not necessarily be directly notified of such a change. Therefore, please ensure that you regularly check this Privacy Notice so you are fully aware of any changes or updates.

12 How you can contact us

If you have any queries about the contents of this Privacy Notice, or wish to inform us of a change or correction to your Personal Data, would like a copy of the Personal Data we collect on you or would like to raise a complaint or comment, please contact us using the details set out below:

Email: privacy@baicommunications.com

Post: 4 Kingdom Street, London, W2 6BD, United Kingdom

13 How to lodge a complaint to the Regulator

You are entitled to lodge a complaint with our data protection regulator if you consider that we have breached your data protection rights. Our data protection regulator is the Information Commissioner's Office, which can be contacted at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, United Kingdom