

Employee / Contractor Data Protection Privacy Policy

Our data protection representative is Alex Callow

1. Why we process your data, the lawful basis for processing your data and who we share it with

We process the data of our employees

- in order to administer the employment relationship
- to keep proper records of payments for tax purposes

The legal bases on which we process personal data of our employees in the manner described above are:

- where any such processing is necessary for the performance of your employment contract with us;
- our legitimate interests in conducting our business in a responsible and commercially prudent manner. We will not process your personal data for these purposes if to do so would constitute an unwarranted interference with your own interests, rights and freedoms;
- to comply with our legal and regulatory obligations; and
- in limited circumstances, your consent (where we have sought it and you have provided it to us), and in which case, you can withdraw your consent at any time;

The legal bases on which we collect, process and transfer special categories of data relating to you (e.g. health data) in the manner described above are:

- where such processing is necessary to comply with our obligations or exercise our rights under employment and social security and social protection law;
- to enable you to exercise your rights under employment and social security and social protection law;
- where such processing is necessary to assess your working capacity; and
- in limited circumstances, your explicit consent (where we have sought it and you have provided it to us), and in which case, you can withdraw your consent at any time.

We share this data, where relevant, with our auditors, our finance department and administration departments, your manager(s), our bank and your bank (to process payments), Irish Life and Friends First (in respect of Personal Health Insurance and Death in Service Benefit (if applicable)) and Willis Tower Watson (in respect of pension (if applicable)) Our

service providers may only process the data of our employees for the purpose of providing us with their services, and no other purpose.

We may also share certain parts of this data with our clients, counterparty solicitors and other persons that you will liaise with in the course of your employment.

We are also required to share certain parts of this data with competent regulatory authorities and bodies as requested or required by law.

We will retain this data for three years after you leave our employment or as long as legally required whichever is the greater.

2. Information received from third parties and the source of that data

We may obtain data from third parties but only if you nominate them as a referee.

3. Your rights relating to personal data

You have the following rights under the GDPR, in certain circumstances and subject to certain exemptions, in relation to your personal data:

- right to access the data - you have the right to request a copy of the personal data that we hold about you, together with other information about our processing of that personal data.
- right to rectification- you have the right to request that any inaccurate data that is held about you is corrected, or if we have incomplete information you may request that we update the information such that it is complete.
- right to erasure - you have the right to request us to delete personal data that we hold about you. This is sometimes referred to as the right to be forgotten.
- right to restriction of processing or to object to processing - you have the right to request that we no longer process your personal data for particular purposes, or to object to our processing of your personal data for particular purposes.
- right to data portability - you have the right to request us to provide you, or a third party, with a copy of your personal data in a structured, commonly used machine readable format.

In order to exercise any of the rights set out above, please contact Alex Callow.

If we are processing personal data based on your consent, you may withdraw that consent at any time. This does not affect the lawfulness of processing which took place prior to its withdrawal.

If you are unhappy with how we process personal data, we ask you to contact us so that we can rectify the situation.

You may lodge a complaint with a supervisory authority. The Irish supervisory authority is the Data Protection Commission.

4. Requirement to process personal data

The provision of your personal data for the purposes described above is a contractual requirement. In addition, we may need to process your personal data to comply with statutory requirements, such as keeping proper records of payments to employees. We cannot continue to employ you or administer the employment relationship if you fail to provide your personal data for the purposes described above.

5. Automated decision-making and profiling

We do not use any personal data for the purpose of automated decision-making or profiling.