

## European Safety Systems Ltd

### **Data protection privacy notice (employment)**

This notice explains what personal data (information) we hold about you, how we collect it, and how we use and may share information about you during your employment and after it ends. We are required to notify you of this information under data protection legislation. Please ensure that you read this notice (sometimes referred to as a 'privacy notice') and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

#### **Who collects the information**

European Safety Systems Ltd trading as E2S Warning Signals ('Company') is a 'data controller' and gathers and uses certain information about you. This information is also used by our affiliated entities and group companies, namely European Circuit Solutions Ltd, E2S Warnsignaltechnik UG, E2S Group Ltd, Foxley Estates Ltd (our 'group companies') and so, in this notice, references to 'we' or 'us' mean the Company and our group companies.

#### **Data protection principles**

We will comply with the data protection principles when gathering and using personal information, as set out in our *data protection (employment) policy*.

#### **About the information we collect and hold**

The table set out in the Schedule summarises the information we collect and hold, how and why we do so, how we use it and with whom it may be shared.

We may also need to share some of the categories of personal information set out in the Schedule with other parties, such as external contractors and our professional advisers and potential purchasers of some or all of our business or on a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations. We may also be required to share some personal information with our trade certification bodies such as BSI, UL, ATEX, Kema, IECEX, FM, VdS, GOST-R etc.

We may also be required to share some personal information with our regulators or as required to comply with the law.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

#### **Where information may be held**

Information may be held at our offices and those of our group companies, and third party agencies, service providers, representatives and agents as described above. We have security measures in place to seek to ensure that there is appropriate security for information we hold.

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### **How long we keep your information**

We keep your information during and after your employment for no longer than is necessary for the purposes for which the personal information is processed.[ Further details on this are available in our record retention policy.

### **Your rights to correct and access your information and to ask for it to be erased**

Please contact Mike Green, Finance Director who can be contacted by email [accounts@e2s.com](mailto:accounts@e2s.com) if you would like to correct or request access to information that we hold relating to you or if you have any questions about this notice. You also have the right to ask Mike Green for some but not all of the information we hold and process to be erased (the 'right to be forgotten') in certain circumstances. Mike Green will provide you with further information about the right to be forgotten, if you ask for it.

### **Keeping your personal information secure**

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

### **How to complain**

We hope that Mike Green, Finance Director can resolve any query or concern you raise about our use of your information. If not, contact the Information Commissioner at [ico.org.uk/concerns/](http://ico.org.uk/concerns/) or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

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THE SCHEDULE  
ABOUT THE INFORMATION WE COLLECT AND HOLD

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
<b>Your name, contact details (ie address, home and mobile phone numbers, email address) and emergency contacts (ie name, relationship and home and mobile phone numbers) <input type="checkbox"/></b>	From you	To enter into/perform the employment contract  Legitimate interest: to maintain employment records and good employment practice	To enter into/perform the employment contract
<b>Details of salary and benefits, bank/building society, National Insurance and tax information, your age <input type="checkbox"/></b>	From you	To perform the employment contract including payment of salary and benefits  Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice	To ensure you receive the correct pay and benefits  Information shared with our payroll administrators ADP and with HM Revenue & Customs (HMRC)
<b>Details of your spouse/partner and any dependants <input type="checkbox"/></b>	From you	To perform the employment contract including employment-related benefits, eg private medical insurance, life assurance and pension	To ensure you receive the correct pay and benefits  Information shared with our payroll administrators ADP and with HM Revenue & Customs

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			(HMRC)
<b>Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information</b> <input type="checkbox"/>	From you and, where necessary, the Home Office	To enter into/perform the employment contract  To comply with our legal obligations  Legitimate interest: to maintain employment records	To carry out right to work checks  Information may be shared with the Home Office
<b>A copy of your driving licence</b> <input type="checkbox"/>	From you	To perform the employment contract  To comply with our legal obligations  To comply with the terms of our insurance	To ensure that you have a clean driving licence  Information may be shared with our insurer
<b>Details of your pension arrangements, and all information included in these and necessary to implement and administer them</b> <input type="checkbox"/>	From you, from our pension administrators Royal London and Origen Financial Services and (where necessary) from your own pension fund administrators	To perform the employment contract including employment-related benefits  To comply with our legal obligations  Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice	To administer your pension benefits AND/OR To comply with our auto-enrolment pension obligations  Information shared with our pension administrators Royal London and Origen Financial Services and with HMRC

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<p><b>Information in your sickness and absence records (including sensitive personal information regarding your physical and/or mental health) <input type="checkbox"/></b></p>	<p>From you, from your doctors, from medical and occupational health professionals we engage</p>	<p>To perform the employment contract including employment-related benefits</p> <p>To comply with our legal obligations</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice, to ensure safe working practices</p>	<p>To maintain employment records, to administer sick pay entitlement, to follow our policies and to facilitate employment-related health and sickness benefits</p> <p>To comply with our legal obligations to you as your employer</p> <p>Information shared with your doctors, with medical and occupational health professionals we engage</p> <p>For further information, see * below</p>
<p><b>Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs</b></p>	<p>From you</p>	<p>To comply with our legal obligations and for reasons of substantial public interest (equality of opportunity or treatment)</p>	<p>To comply with our equal opportunities monitoring obligations and to follow our policies</p> <p>For further information, see * below</p>

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<p><b>Information on grievances raised by or involving you</b></p>	<p>From you, from other employees and from consultants we may engage in relation to the grievance procedure</p>	<p>To perform the employment contract</p> <p>To comply with our legal obligations</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice</p>	<p>For staff administration, to follow our policies and to deal with grievance matters</p> <p>Information shared with relevant managers, HR personnel and with consultants we may engage</p>
<p><b>Information on conduct issues involving you</b></p>	<p>From you, from other employees and from consultants we may engage in relation to the conduct procedure</p>	<p>To comply with our legal obligations</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice, to ensure safe working practices</p>	<p>For staff administration and assessments, to follow our policies, to monitor staff performance and conduct and to deal with disciplinary and grievance matters</p> <p>Information shared with relevant managers, HR personnel and with consultants we</p>

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			may engage
<b>Details of your appraisals and performance reviews</b>	From you, from other employees and from consultants we may engage in relation to the appraisal/performance review process	To comply with our legal obligations  Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice, to ensure safe working practices	For staff administration and assessments, to follow our policies, to monitor staff performance and conduct and to deal with disciplinary and grievance matters  Information shared with relevant managers, HR personnel and with consultants we may engage
<b>Details of your performance management/improvement plans (if any)</b>	From you, from other employees and from consultants we may engage in relation to the performance review process	To comply with our legal obligations  Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and	For staff administration and assessments, to follow our policies and to monitor staff performance  Information shared with relevant managers, HR personnel and

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		good employment practice, to ensure safe working practices	with consultants we may engage
<b>Details of your time and attendance records</b>	From you and from Safran finger print readers and ADP Realtime devices	To perform the employment contract  Legitimate interest: to monitor and manage staff access to our systems and facilities and to record staff absences	For payroll and staff administration and assessments, to follow our policies and to monitor staff performance and attendance  Information shared with relevant managers, HR personnel and with consultants we may engage and with our payroll administrators ADP
<b>Information regarding your work output</b>	<i>From you completing works orders. From you completing work diaries (Engineering department)</i>	To perform the employment contract  Legitimate interests: to maintain employment records	For payroll and staff administration and assessments, to follow our policies and to monitor staff performance



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			<p>and attendance</p> <p>Information shared with relevant managers, HR personnel and with consultants we may engage and with our payroll administrators ADP</p>
<p><b>Information in applications you make for other positions within our organisation</b></p>	<p>From you</p>	<p>To enter into/perform the employment contract</p> <p>To comply with our legal obligations</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice</p>	<p>To process the application</p> <p>Information shared with relevant managers, HR personnel and with consultants we may engage</p>
<p><b>Information about your use of our IT, communication and other systems</b></p>	<p>Automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems,</p>	<p>Legitimate interests:</p> <p>to monitor and manage staff access to our systems and facilities</p>	<p>To protect and carry out our legitimate interests (see adjacent column)</p> <p>Information</p>

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	<p>communications systems, remote access systems, email and instant messaging systems, intranet and Internet facilities, telephones, voicemail, mobile phone records [<i>insert any other relevant systems such as data loss prevention tools, next-generation firewalls, unified threat management systems, transport layer security, eDiscovery technology, mobile device management systems</i>]</p>	<p>to protect our networks, and personal data of employees and customers/clients, against unauthorised access or data leakage</p> <p>to ensure our business policies, such as those concerning security and internet use, are adhered to</p> <p>for operational reasons, such as maintaining employment records, recording transactions, training and quality control</p> <p>to ensure that commercially sensitive information is kept confidential</p> <p>to check that restrictions on your activities that apply after your employment has ended (post-termination restrictions or restrictive covenants) are being complied with</p> <p>to prevent unauthorised access and modifications to</p>	<p>shared with relevant managers, HR personnel and with consultants we may engage</p>
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		<p>our systems</p> <p>as part of investigations by regulatory bodies, or in connection with legal proceedings or requests</p>	
<p><b>Details of your use of business-related social media, such as LinkedIn</b></p>	<p>From relevant websites and applications</p>	<p>Legitimate interests:</p> <p>to monitor and manage staff access to our systems and facilities</p> <p>to protect our networks, and personal data of employees and customers/clients, against unauthorised access or data leakage</p> <p>to ensure our business policies, such as those concerning security and internet use, are adhered to</p> <p>for operational reasons, such as maintaining employment records, recording transactions, training and quality control</p> <p>to ensure that commercially sensitive information is kept confidential</p>	<p>To protect and carry out our legitimate interests (see adjacent column)</p> <p>Information shared with relevant managers, HR personnel and with consultants we may engage</p>

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		<p>to check that restrictions on your activities that apply after your employment has ended (post-termination restrictions or restrictive covenants) are being complied with</p> <p>as part of investigations by regulatory bodies, or in connection with legal proceedings or requests</p>	
<p><b>Your use of public social media (only in very limited circumstances, to check specific risks for specific functions within our organisation; you will be notified separately if this is to occur)</b></p>	<p>From relevant websites and applications</p>	<p>Legitimate interests:</p> <p>to monitor and manage staff access to our systems and facilities</p> <p>to protect our networks, and personal data of employees and customers/clients, against unauthorised access or data leakage</p> <p>to ensure our business policies, such as those concerning security and internet use, are adhered to</p> <p>for operational reasons, such as maintaining employment</p>	<p>To protect and carry out our legitimate interests (see adjacent column)</p> <p>Information shared with relevant managers, HR personnel and with consultants we may engage</p>

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		<p>records, recording transactions, training and quality control</p> <p>to ensure that commercially sensitive information is kept confidential</p> <p>to check that restrictions on your activities that apply after your employment has ended (post- termination restrictions or restrictive covenants) are being complied with</p> <p>as part of investigations by regulatory bodies, or in connection with legal proceedings or requests</p>	
<p><b>Details in references about you that we give to others</b></p>	<p>From your personnel records, our other employees</p>	<p>To perform the employment contract</p> <p>To comply with our legal obligations</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate</p>	<p>To provide you with the relevant reference</p> <p>To comply with legal/regulatory obligations</p> <p>Information shared with relevant managers, HR personnel and the recipient(s) of the</p>

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		governance obligations and good employment practice	reference
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You are required (by law or under the terms of your contract of employment, or in order to enter into your contract of employment) to provide the categories of information marked '☐' above to us to enable us to verify your right to work and suitability for the position, to pay you, to provide you with your contractual benefits, such as life insurance, private medical insurance, cycle to work, and childcare vouchers and to administer statutory payments such as statutory sick pay (SSP). If you do not provide this information, we may not be able to employ you, to make these payments or provide these benefits.

\* Further details on how we handle sensitive personal information are available from the HR department. You can request further details from Mike Green, Finance Director by email [accounts@e2s.com](mailto:accounts@e2s.com)