



## OCS Employee Privacy Notice

<b>Purpose and Scope</b>	<p>We value the privacy of those who provide personal information to us.</p> <p>This Privacy Notice describes:</p> <ul style="list-style-type: none"><li>• what personal information we collect about our employees, workers and contractors, and potential employees;</li><li>• how we use and otherwise process that information;</li><li>• the basis upon which we process it;</li><li>• with whom it is shared; and</li><li>• how it is stored.</li></ul> <p>This Notice applies to all visitors and third parties ("<b>you</b>" and "<b>your</b>"), of OCS Group Limited, company number [01298292], a limited company registered at 4 Tilgate Forest Business Park, Brighton Road, Crawley, West Sussex RH11 9BP ("OCS", "we", "our"); data protection registration number Z6744241, and any members of our groups including any subsidiaries as defined by section 1159 of the Companies Act 2006 which:</p> <ul style="list-style-type: none"><li>a) employs you or is your prospective employer; and</li><li>b) processes personal information that relates to the monitoring of your conduct as an employee.</li></ul> <p>This Privacy Notice also describes other important topics relating to this information and its privacy.</p>
<b>Compliance and Accountability</b>	<p><b>Please read this Employee Privacy Notice carefully to understand how we handle your personal information.</b></p> <p>This Privacy Notice may be amended from time to time. Any changes we make to our Employee Privacy Notice in the future will be posted on the relevant intranet page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to notice content.</p>
<b>Information Collection</b>	<p>We may collect and use any of the following information about you and we refer to this as "personal information" throughout this Notice:</p> <p><b>Your personal details:</b></p> <ul style="list-style-type: none"><li>➤ your full name (including first name, maiden name and surname);</li><li>➤ birth date;</li><li>➤ home address;</li><li>➤ proof of identification and address; (to include passport details)</li><li>➤ national insurance number/social security number;</li><li>➤ nationality;</li><li>➤ personal contact telephone number;</li><li>➤ personal email address;</li><li>➤ gender;</li><li>➤ marital status;</li><li>➤ drivers licence and vehicle licence details;</li><li>➤ details of character and physical description; and</li><li>➤ leisure activities and interests</li></ul> <p><b>Your family/next of kin details:</b></p> <ul style="list-style-type: none"><li>➤ spouse or civil partner name;</li><li>➤ spouse or civil partner contact information (to include telephone number and address);</li><li>➤ names of dependents; and</li><li>➤ co-insured family members details and beneficiaries of your life insurance or other benefits.</li></ul> <p><b>Documentation required under immigration laws:</b></p> <ul style="list-style-type: none"><li>➤ citizenship details;</li><li>➤ national identification number;</li><li>➤ other documents required to show your right to live in the UK and to work for your employer there; and</li></ul>



	<ul style="list-style-type: none"> <li>➤ details required for residency, work permit and/or visa processes.</li> </ul> <p><b>Compensation/employment information:</b></p> <ul style="list-style-type: none"> <li>➤ current/former titles and positions held with us (and information about that position, including how long in position, supervisor, location of position, employee identification number, promotions, training records, overall work history, languages spoken, disciplinary actions, grievances, retirement eligibility, transfers);</li> <li>➤ identification search results, including employment searches, directorship searches, bankruptcy searches, media searches and criminal record checks;</li> <li>➤ current and historic compensation with OCS (base salary, bonus, pension contributions);</li> <li>➤ work contact information (phone number, postal/mailling/email address);</li> <li>➤ performance reviews and information (including career forecasts and development plans);</li> <li>➤ workplace accident information, drug and alcohol testing information, sickness and other absence information and medical or health information (relevant to your employment and/or provided by you to OCS, for example, medical assessments and occupational health reports);</li> <li>➤ work hours (overtime and shift work, hours worked and standard hours);</li> <li>➤ previous employment references;</li> <li>➤ your photo (including for relevant access control systems);</li> <li>➤ travel bookings and other expense claims, records and information; and</li> <li>➤ written, electronic and phone communications.</li> </ul> <p><b>Payroll data:</b></p> <ul style="list-style-type: none"> <li>➤ bank details;</li> <li>➤ working time records;</li> <li>➤ current compensation; tax information; and</li> <li>➤ IDs related to payroll processing.</li> </ul> <p><b>System and application access data:</b> any information required to access company systems and applications (such as system ID).</p> <p><b>Talent management/resume/CV information:</b> details contained in an application and resume/CV or otherwise provided to us (digitally or manually), including previous employment background, professional qualifications, references, career development and skills analysis, training, departmental changes, performance and calibration details. We may also collect psychometric testing and personality profiling data, as applicable. However, we do not use this data to make any automated decisions about you.</p> <p><b>Management records:</b> details of any shares of common stock or directorships that you may hold.</p> <p><b>Physical security records:</b></p> <ul style="list-style-type: none"> <li>➤ <b>CCTV footage:</b> images of individuals identifiable from the apron of OCS properties.</li> <li>➤ <b>Biometric data</b> (fingerprints) for use with clock in terminals on some sites</li> <li>➤ <b>Photographs:</b> images will be used on access cards for identification purposes and for marketing materials of the company, as applicable</li> </ul>
<p><b>Sources of personal information</b></p>	<p>We may receive some of this personal information from third parties, such as recruitment agencies, your former employer and public agencies.</p>
<p><b>Special categories of personal data</b></p>	<p>Some of the personal information that we collect about you or which you provide to us about you, your family and benefit beneficiaries may be special categories of data. Special categories of data include information about your physical and mental health, sexual orientation, racial or ethnic origin, political opinions, philosophical belief, trade union membership and biometric data. We will only process special category data where we have an additional lawful basis for processing.</p>



<p><b>Use of your personal information</b></p>	<p>We may collect, use and store your personal information for the following reasons:</p> <ul style="list-style-type: none"> <li>➤ to operate, support and centralise human resources administration and management (including but not limited to recruitment, payroll administration, employee administration, learning management, performance management and review, data storage, expense reporting, benefits management and termination of your employment);</li> <li>➤ to administer your contract of employment;</li> <li>➤ to conduct satisfaction surveys in order to maintain continuous improvement;</li> <li>➤ candidate profiling and suitability assessment;</li> <li>➤ health and safety records management;</li> <li>➤ occupational health referrals and management;</li> <li>➤ security vetting, criminal records checks, credit checks and clearances (where applicable and allowed by law);</li> <li>➤ confirming information on resumes, CVs and covering letters, providing reference letters and performance reference checks;</li> <li>➤ staff management and promotions;</li> <li>➤ monitoring employee communication and internet usage for the purpose of ensuring that our rules are being complied with and for legitimate business purposes, in accordance with our Information Security Policy and Acceptable Use Policy];</li> <li>➤ equal opportunities monitoring;</li> <li>➤ provision of staff information to customers, agencies and suppliers in the course of the provision of our services;</li> <li>➤ business forecasting, reporting, analysis, and insight, to include business development requirements, management and operational reporting, in accordance with business growth, operational activities, and the provision of our services to clients;</li> <li>➤ taxation and registrations for employees working outside the country where they are based;</li> <li>➤ CCTV monitoring and other security of company facilities;</li> <li>➤ ensuring adequate insurance coverage for our business;</li> <li>➤ business management to include accounting and auditing;</li> <li>➤ compliance with any procedures, laws and regulations which apply to us;</li> <li>➤ to monitor, facilitate and record training and development requirements; to include the use of the learning management system (LMS) data analytics, maintenance and management</li> <li>➤ event planning and management – to include travel and accommodation arrangements;</li> <li>➤ establishing, exercising or defending our legal rights; and otherwise, for the lawful operation of our business.</li> </ul>
<p><b>Use of your family and next of kin information</b></p>	<p>Separately, we may process personal information about your family and next of kin for the purposes of provision of benefits and so that we may contact them in an emergency. If you disclose information about your family in written, electronic or phone communications, you will be asked to confirm that you have their authority to do so, where applicable. We may also have access to this information on our systems.</p>
<p><b>Other uses</b></p>	<p>We will only process your or your family/next of kin's personal information for the specific purposes listed above or for any other purposes specifically permitted by law. If we wish to process your personal information for any other purpose, we will notify you where it is reasonable to do so.</p>
<p><b>Legal bases for personal information use</b></p>	<p>We need to have a legal basis for using your personal information for the processing set out in this privacy notice as set out below:</p> <ol style="list-style-type: none"> <li>a) our use of your personal information is necessary for the performance of our obligations under our contract with you (for example, to pay you or to confer a benefit under the terms of an employment contract); or</li> <li>b) our use of your personal information is necessary for complying with our legal obligations, particularly as your employer (or prospective employer) (for example, providing your personal information to Government departments); or</li> <li>c) where neither (a) nor (b) apply, it is necessary for the purposes of our legitimate interests or the legitimate interests of a third party (for example, to ensure a safe working environment, to ensure</li> </ol>



	<p>the reliability of our employees, workers and contractors or to maintain adequate personnel records).</p> <p>We will only process Special Category Data where we have an additional lawful basis for processing on one of the following grounds:</p> <ul style="list-style-type: none"> <li>▪ Explicit consent – where you have given us explicit consent.</li> <li>▪ Legal obligation related to employment - The processing is necessary for a legal obligation in the field of employment and social security law or for a collective agreement.</li> <li>▪ Vital interests - The processing is necessary in order to protect the vital interests of the individual or of another natural person where the data subject is physically or legally incapable of giving consent. This is typically limited to processing needed for medical emergencies.</li> <li>▪ Not for profit bodies - The processing is carried out in the course of the legitimate activities of a not-for-profit body and only relates to members or related persons and the personal data is not disclosed outside that body without consent.</li> <li>▪ Public information - The processing relates to personal data which is manifestly made public by the data subject.</li> <li>▪ Legal claims - The processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.</li> <li>▪ Substantial public interest - The processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law.</li> <li>▪ Healthcare - The processing is necessary for healthcare purposes and is subject to suitable safeguards.</li> <li>▪ Public health - The processing is necessary for public health purposes and is based on Union or Member State law.</li> <li>▪ Archive - The processing is necessary for archiving, scientific or historical research purposes, or statistical purposes and is based on Union or Member State law. Member States can introduce additional conditions in relation to health, genetic, or biometric data.</li> </ul> <p>If we have sought your consent to collect and use certain types of personal information, you have the right to withdraw your consent at any time, by contacting your local HR representative.</p>
<p><b>Disclosure of personal information to Group companies</b></p>	<p>Your business contact information will be made available to other OCS employees, temporary staff, workers and contractors, and with customers, agencies and suppliers in the course of providing our services. This information includes your name, position, workplace telephone numbers, work addresses and email addresses, employee department, employee job title, employee photo and miscellaneous position details.</p> <p>Your personal information may be shared with any company that is a member of our group, where we have a lawful basis upon which to do so for example internal administrative purposes, corporate strategy, auditing, monitoring and research &amp; development.</p> <p>We may also share your personal information with our group companies where they provide products and services to us, such as information technology systems, health and safety monitoring, security services, human resources services and employee monitoring.</p> <p>Access to your personal information is limited to those employees who need to know the personal information, and may include your managers, as well as employees in HR, the Helpdesk, Legal, Insurance, IT, Finance and Payroll.</p>
<p><b>Disclosure of personal information to third parties</b></p>	<p>We may share your personal information with the following categories of third parties:</p> <ul style="list-style-type: none"> <li>• companies that provide products and services to us, such as:</li> <li>• payroll and benefits providers;</li> <li>• pension providers;</li> <li>• insurance companies, including those providing medical insurance and group income protection;</li> <li>• human resources services, such as pre-employment checks and for employee monitoring;</li> <li>• recruitment agencies;</li> <li>• parties requesting an employment reference;</li> <li>• travel agencies and transport providers;</li> <li>• occupational health assessment providers and medical professionals undertaking drug and alcohol testing;</li> </ul>



	<ul style="list-style-type: none"> <li>• information technology systems suppliers and support, including email archiving, telecommunication suppliers, back-up and disaster recovery and cyber security services; psychometric testing providers and other outsourcing providers, such as off-site storage providers and cloud services providers.</li> <li>• other parties such as legal and regulatory authorities, accountants, auditors, lawyers and other outside professional advisors.</li> </ul> <p>We will also disclose your personal information to third parties:</p> <ul style="list-style-type: none"> <li>• where it is in our legitimate interests to do so to run, grow and develop our business, for example:             <ul style="list-style-type: none"> <li>○ if we sell or buy any business or assets, we may disclose your personal information to the prospective seller or buyer of such business or assets;</li> <li>○ if OCS or substantially all of its assets are acquired by a third party, in which case personal information held by OCS will be one of the transferred assets;</li> </ul> </li> <li>• if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, any lawful request from government or law enforcement officials and as may be required to meet national security or law enforcement requirements or prevent illegal activity;</li> <li>• to enforce our contract with you, to respond to any claims, to protect our rights or the rights of a third party, to protect the safety of any person or to prevent any illegal activity; or</li> <li>• to protect the rights, property or safety of OCS, our employees, workers and contractors, customers, suppliers or other persons.</li> </ul> <p>Some of these companies (including our group companies) may use your data in countries which are outside of the European Economic Area. Where this is the case, we will ensure appropriate safeguards are in place to facilitate the safe transfer and handling of your personal data.</p>
<b>Transfers of information outside of the EEA</b>	<p>We are a global company and may transfer the personal data we collect about you to countries outside the EEA so long as there is a lawful basis for doing so or we have your consent. In certain limited circumstances we may seek your explicit consent to send your personal data outside of the EEA. Before sending your personal data to countries outside of the EEA data we will ensure that adequate data protection provisions are in place, the processor has provided appropriate safeguards to ensure enforceable rights and legal remedies or other specified conditions are met under data protection law. When doing so we will inform you in clear terms of the data protection framework in place in the relevant countries in order to enable you to make an informed decision.</p>
<b>Restrictions on use of personal information by recipients</b>	<p>Any third parties with whom we share your personal information are limited (by law and by contract) in their ability to use your personal information for the specific purposes identified by us. We will always ensure that any third parties with whom we share your personal information are subject to privacy and security obligations consistent with this Privacy Notice and applicable laws.</p>
<b>Your Rights</b>	<p>You have certain rights in relation to your personal information under data protection legislation. If you would like further information in relation to these or would like to exercise any one of them, please contact <a href="mailto:DataProtection@ocs.com">DataProtection@ocs.com</a>. You have the right to request that we:</p> <ul style="list-style-type: none"> <li>• provide access to any personal information which we hold about you;</li> <li>• update any of your personal information which is out of date or incorrect;</li> <li>• delete any personal information which we hold about you;</li> <li>• restrict the way that we process your personal information;</li> <li>• provide your personal information to a third-party provider of services;</li> <li>• provide you with a copy of any personal information which we hold about you; or</li> <li>• consider any valid objections which you have to our use of your personal information.</li> </ul>
<b>Retention of personal information</b>	<p>We keep your personal information for no longer than necessary for the purposes for which the personal information is used or otherwise processed. The length of time we retain personal information depends on the purposes for which we collect and use it and / or as required to comply with applicable laws. In all cases we will only retain data as required to support legitimate business purposes.</p>
<b>Security</b>	<p>OCS is committed to protecting personal information from loss, misuse, disclosure, alteration, unavailability, unauthorised access and destruction and takes all reasonable precautions to safeguard the confidentiality of personal information, including through use of appropriate organisational and technical measures. Organisational measures include physical access controls to our premises, staff</p>



	<p>training and locking physical files in filing cabinets. Technical measures include use of encryption, passwords for access to our systems and use of anti-virus software.</p> <p>In the course of provision of your personal data to us, your personal information may be transferred over the internet. Although we make every effort to protect the personal information which you provide to us, we cannot guarantee the security of your personal information transmitted to us over the internet and any such transmission is therefore at your own risk.</p>
<b>Third party websites</b>	<p>You may, from time to time, during your employment, access links to or other websites operated by third parties (e.g. training providers, industry news sources, sales portal, insurance, pensions, well-being, bulletins etc). Please note that this Privacy Notice only applies to the personal information that we collect from or about you and we cannot be responsible for personal information collected and stored by third parties. Third party websites have their own terms and conditions and privacy policies, and you should read these carefully before you submit any personal information to these websites. We do not endorse or otherwise accept any responsibility or liability for the content of such third-party websites or third-party terms and conditions or policies.</p>
<b>Further questions or making a complaint</b>	<p>If you have any queries or complaints about our collection, use or storage of your personal information, or if you wish to exercise any of your rights in relation to your personal information, in the first instance, contact your Line Manager. Thereafter, please contact our Data Protection Team - email <a href="mailto:DataProtection@ocs.com">DataProtection@ocs.com</a> or write to 4 Tilgate Forest Business Park, Brighton Road, Crawley, West Sussex RH11 9BP. We will investigate and attempt to resolve any such complaint or dispute regarding the use or disclosure of your personal information. You may also make a complaint to the Information Commissioner's Office (ICO) Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF on 0303 123 1113</p>