CONCEPT
GROUP (WIGAN) LIMITED

GDPR Privacy Notice - for employees, workers and contractors

Purpose and context of this Notice

Wigan Group (Wigan) Ltd ('Concept Group' or 'the Company' for this document) is committed to protecting the privacy and security of your personal information. This Privacy Notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the General Data Protection Regulation ('GDPR'). It also refers where applicable to the Data Protection Act 2018 ('DPA18'). Under the GDPR, Concept Group (Wigan) Ltd is a 'data Controller and Processor'. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this Privacy Notice. Concept Group (Wigan) Ltd reserves the right to update this Privacy Notice at any time. It does not form part of any contract of employment or other contract to provide services

Scope of this Notice

The generic contents of this Notice are applicable to all parts of the Concept Group (Wigan) Ltd internationally, with the exception of any territory where the scope of GDPR is not relevant. Where the Notice refers to local policies and contact details, where possible specific details have been inserted for each locality. This Notice applies to all current and former employees (permanent and temporary), as well as self-employed contractors, workers, and any other people engaged in any way by the Company for whom it is necessary to hold and/or process personal information. All references to 'employer'/'employee' below shall be taken to include all such people engaged by the Company, whether or not they are actual employees.

How your information will be used

1. Concept Group (Wigan) Ltd needs to keep and process information about you for normal employment purposes. The information that we hold and process will be used for our management and administrative use only. We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately, during the recruitment process, whilst you are working with us, at the time when your employment ends and after you have left. We will only use your personal information when the law allows us. This includes: using information to enable us to comply with the contract we have entered in to with you; to comply with any legal requirements; where it is necessary to pursue the legitimate interests of the Company and protect our legal position in the event of legal proceedings; to protect your interests or (rarely) where it is needed in the public interest. If you do not provide this data, we may be unable in some circumstances to perform the contract we have entered in to with you (e.g. paying you or providing a benefit), or we may be prevented GDPR Privacy Notice - March 2018 2 from complying with our

legal obligations (e.g. ensuring the health and safety of our workers). We will tell you about the implications of you not providing such data. In addition to the legal reasons described above for using your personal information, you may also give us express consent to use some of your data for other purposes. Where we are processing data based on your express consent, you have the right to withdraw that consent at any time.

2. As a company pursuing our normal business activities, we may sometimes need to process your data to pursue our legitimate business interests, for example to prevent fraud, for administrative purposes or for reporting potential crimes.

3. Much of the information we hold will have been provided by you to us. Some may come from other internal sources, such as your manager, and some may come from external sources, such as referees.

4. Personal data, or personal information, means any information about an individual from which that person can be identified. The sort of personal information we hold about you includes documents, and data, such as:

• Your name, title, addresses, telephone numbers, personal email address, date of birth, gender, marital status, next of kin details, driving licence details

• Your application form, CV and references • Offer letters to you, and your contract of employment and any amendments to it

• Correspondence with or about you. For example, letters to you about a pay rise or, at your request, a letter to your mortgage provider confirming your salary

• Information needed for payroll, benefits and expenses purposes e.g. bank account details, social security number • Contact and emergency contact details that you provide to us

• Records of holiday, sickness and other absence • Information needed for equal opportunities monitoring

• Records relating to your career history, such as training records, appraisals, other performance measures

• Disciplinary and grievance records • CCTV footage and photographs (in some locations)

5. It is possible that you may be referred to in many Company documents and records that are produced by you or your colleagues while carrying out your duties and the business of the Company. For example, you may be accountable for signing off certain documents, or being the named person in a position of responsibility for a project. In such cases, the existence of the document may need to continue after you have left the Company. The Data Protection Policy which is relevant to your country refers to this point; contact your local HR department for access to the Policy.

6. Where necessary, we may keep information relating to your health, which could include reasons for absence, and doctor or other medical professionals' reports and notes. This information will be GDPR Privacy Notice - March 2018 3 used to comply with our health and safety, and our occupational health obligations e.g. to consider how your health affects your ability to do your job

and whether any adjustments to your job might be appropriate. We also need this data to administer and manage statutory and Company sick pay (where relevant), and possibly for health insurance and/ or life assurance policies.

7. Where we process 'special categories' of more sensitive, personal information (i.e. relating to: your racial or ethnic origin; political opinions; religious and philosophical beliefs; trade union membership; biometric data – e.g. fingerprints, iris scans; sexual orientation; health and sickness records; criminal convictions and offences), we will obtain your explicit consent to those activities, unless: the law requires us to process that data to meet our legal obligations; we are obliged to process the data in the public interest (e.g. equal opportunities monitoring); the information is required to protect your health in an emergency. Where we are processing data based on your consent, you have the right to withdraw that consent at any time.

8. Concept Group (Wigan) Ltd also monitors computer, telephone and mobile telephone use, as detailed in local country/ region policies. Contact your HR department for the location of the relevant policy/policies. For some staff, we also keep records of hours of work via an electronic attendance recording system.

9. We will only disclose information about you to third parties if we are legally obliged to do so, or where we need to comply with our contractual duties to you (e.g. we may need to pass on certain information to pension or health insurance schemes).

10. We may transfer information about you to other companies within the Concept Group (Wigan) Ltd for purposes connected with your employment or the management of the Company's business.

11. In limited and necessary circumstances, your information may be transferred outside of the EU or to an international organisation to comply with our legal or contractual requirements. In such circumstances we will, in advance of the transfer, complete Data Protection Impact Assessments (DPIAs) and will put in place safeguards to ensure the security of your data.

12. We do not use automated decision making or profiling. See paragraph 15h. below for more information on this.

13. Your personal data will normally be stored for a period of seven (7) years after the date of your leaving the Company and will be stored in the country of your employment. Details of any variations to the criteria used for determining how long your data will be stored for are available in the Data Retention Schedule which is an appendix to this document, and from the Group Data Protection Officer (DPO) and your local Data Protection Officer (DPO) who hold a register.

14. If in the future we intend to process your personal data for a purpose other than that which it was collected we will provide you with information on that purpose at the time.

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Your rights

15. Under the General Data Protection Regulation (GDPR) and The Data Protection Act 2018 (DPA18) you have a number of rights regarding your personal data. You have the right to:

a) - be informed what we do with your data

• Through this Notice (and similar notices) we are explaining in simple language what we will use the data collected from you and about you, for. This is known as a 'Fair Processing Notice'.

• We will use the data we hold on you to support our normal business practices including legally required processing for employment, taxation, general Human Resources activities and similar purposes.

• We may also use your data to offer non-essential services, or to refer to you in social undertakings e.g. in a Company newsletter. You have a choice about agreeing to such usage.

b) - see what data we hold on you

• You have a right to know what data we hold on you, and confirmation that we are processing it. This will be provided to you on request, within one month, free of charge. A 'Personal Data Access Request' form is available from your local HR department, should you wish to make such a request.

c) - correct your data if it is inaccurate • We have an obligation to ensure the data we hold on you is accurate. To this end, we may periodically ask you to confirm certain details, for instance, telephone number, address, etc.

• If a self-service portal is provided for you to access (e.g. a self-service HR system), then it is your responsibility to regularly check that the personal data within the system is accurate.

• You may tell us of any changes which should be made. A 'Request to have Personal Data Rectified' from is available from your local HR department, should you wish to make such a request.

• We must complete any rectifications within one month and will not charge you for this.

• In addition, we will inform any third parties with which we have shared your data that a correction is required and will inform you who those third parties are.

d) - erase your data in certain circumstances

• Where data is not required for processing, or where you withdraw consent, or object to processing where there is no legitimate reason for us to hold the data, you may ask for that data to be erased. GDPR Privacy Notice - March 2018 5

• A 'Request to have Personal Data Erased' form is available from your local HR department, should you wish to make such a request.

• This is not an absolute right. Where we are required to retain the data for a lawful reason (typically in employment this will be to comply with taxation and employment laws), then we will reject the request to erase data, and explain our reasons.

• Where we can accept your request for erasure, the data in question will be deleted within one

month and we will make no charge for this. Exceptionally, if the request is complex, we may require longer to achieve this and will inform you that this will be the case. This extension period will not exceed two months in total.

e) - restrict processing of your data

• You may ask us to restrict further processing of your data but allow it to be retained in our systems. This could enable you to ask us, for example, to suspend the processing of personal information about you if you want to establish its accuracy or the reason for processing it. Where allowed by law, we will comply with this.

• Typically, this is not a right exercised within the employment context. However, we will provide the ability to exercise this right should it prove necessary.

f) - have your data sent to another party at your request

• You may ask for your data to be sent to another party. We will provide this in a structured machine-readable format (typically CSV, but in another open format should that be more suitable). We will provide this within one month and will not charge for the provision.

• Typically, this is not a right exercised within the employment context. However, we will provide the ability to exercise this right should it prove necessary.

g) - object to our processing

• You may object to our processing of your data, if your objection is based on one of the following three reasons:

1. That the processing is based on the legitimate interests of the Company and there is something about your particular situation which makes you want to object to processing on this basis.
2. That your data is being used for direct marketing
3. That your data is being used for scientific research and statistical analysis

• Typically, this is not a right exercised within the employment context. However, we will provide the ability to exercise this right should it prove necessary. GDPR Privacy Notice - March 2018 6

h) - be informed of any automated decision making and profiling we might use • In general, we do not use your personal data to perform any automated decision making or profiling. (This means making a decision or evaluating certain things about an individual solely by automated means without any human involvement.) Should the Company decide to use any such mechanisms in the future, we will inform you about the nature of the processing, provide a simple method for you to request human intervention or challenge a decision, and we will perform regular checks to ensure the system is working as intended.

16. If you have provided consent for the processing of some elements of your personal data you have the right (in certain circumstances) to withdraw that consent at any time. This will not affect the lawfulness of the processing before your consent was withdrawn. To withdraw consent for the processing of specific data, you may be able to withdraw consent via the same system with which you originally provided it, or you may write or email to your head of Human Resources (HR) or the

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Data Protection Officer, in your country.

17. You have the right to lodge a complaint to the relevant Supervisory Authority in your country if you believe that we have not complied with the requirements of the GDPR or DPA18 regarding your personal data. In the UK the relevant Supervisory Authority is the Information Commissioner's Office.

18. Concept Group (Wigan) Ltd is the controller and processor of data for the purposes of the DPA18 and GDPR. 19. If you have any questions about this Privacy Notice, or concerns as to how your data is processed you can contact any of the following:

• The Data Protection Officer in your country if one has been appointed. Speak to your local Human Resources department for information on this

. • Your local Human Resources department.

• The Data Protection Officer for Concept Group (Wigan) Ltd, or the Group Human Resources Director through email or in writing at the following address:

Concept Group (Wigan) Ltd, 384 Woodhouse Lane, Wigan, Lancashire, WN6 7NF, UK

Signed: D S Rogers.

Date: 19/9/23

Reviewed: 19/9/23