

## Data Protection Information for Applicants and Employees

### Employee Privacy Policy - Ireland

01/10/2022 V3

At dormakaba we take the protection of your personal data very seriously and will always process your personal data in compliance with the legal data protection regulations.

This Privacy Policy (together with our terms and conditions and any other documents referred to in it) describes:

- how your personal data is collected and used for recruitment and employment purposes and
- applies to current and former employees, workers, applicants, interns, diploma students, student trainees, seasonal workers, and temporary employees.

We respect your right to privacy and will only process personal data about you or provided by you in accordance with the Data Protection Legislation, which for the purposes of this Privacy Policy shall mean:

- 1) the retained UK law version of the General Data Protection Regulation ((EU) 2016/679) (UK GDPR), the Data Protection Act 2018 and any other national implementing laws, regulations, and secondary legislation, as amended or updated from time to time in the UK; and then
- 2) any successor legislation to the UK GDPR or the Data Protection Act 2018 and other applicable privacy laws.

We have drafted this Privacy Policy to be as clear and concise as possible. Please read it carefully to understand our policies regarding your information and how we will treat it. In the following, terms such as "applicant," "employee," etc. will be used in a gender-neutral manner.

### Responsible Authority and Data Protection Officer

Our organisation name is dormakaba Ireland Limited ("organisation," "company" "we," "our," or "us") and we are a "data controller". This means that we are responsible for deciding how we hold and use personal data about you. We are required under data protection legislation to notify you of the information contained in this privacy policy.

Our Data Protection Office can be contacted at the above address or at [gdpr.gb@dormakaba.com](mailto:gdpr.gb@dormakaba.com).

For further information on how dormakaba protects your data and complies with all GDPR and data protection legislation in our other countries, please [click here](#).

### What Personal Data do we Collect?

We may collect, store, and use the following categories of personal data:

- personal identification (passport photo for company ID) and contact information (e.g., title, name, address, date of birth, religious denomination, nationality, gender, marital status, whether you have children, e-mail address, telephone, and mobile number).

- Information about your work or residence permit including any VISA documentation or internship certificate.
- Copy of driving license, passport, birth and marriage certificates, decree absolute.
- Photographs.
- Information around marital status, next of kin, dependents, emergency contacts and doctor's details.
- Payment and benefits details (e.g., your IBAN, BIC, NI Number).
- Pay (basic pay, recurring payments and deductions, one-off payments, occupational and survivor's pensions); legally imposed deductions; company car, non-cash benefits, shares.
- Insurance (e.g., direct insurance, occupational pension schemes, insolvency insurance, etc.).
- Benefit information, health insurance details, life assurance, pension details.
- Organisational allocation, management, cost centre, working hours, terms, and conditions.
- Data about your personal qualifications, e.g., school leaving certificate, vocational qualifications, language skills, certifications.
- CV (former employers and roles).
- Secondary employment, register of interests and volunteering information.
- Former work references.
- Assessments (probationary period assessment, performance assessment, etc.), cautions warnings, appraisals.
- Training (internal, external, professional qualification training records etc.).
- Details of periods of leave, including clock-in and clock-out bookings, holiday, special holidays, time balance, notice periods, other absence, sickness dates & reasons, doctors notes, letters relating to treatment and reasons for leave.
- Disability status; maternity and parental leave; employer's liability insurance association classification.
- Contractual paperwork including start and end dates.
- Your car registration plate.
- Work and commuting accidents.
- Vaccination status
- Disclosure & Barring Service.

If you are employed on the basis of a temporary contract, this data has already been received and will be transferred dormakaba UK Ltd, Kaba UK Ltd or dormakaba Ireland by the hirer for the purpose of the initiation or fulfilment of the contract.

### **Purpose and Legal Basis of Data Processing**

When processing personal data, **dormakaba Ireland** will comply with the requirements of both the UK & EU GDPR, the Data Protection Act 2018 (DPA) and any associated legislation.

For lawful processing of personal data under special categories and in relation to criminal offences, we rely on processing conditions from chapter 2, article 6 (a, b & c).

We process your personal data in accordance with EU-GDPR for the purpose of establishing, fulfilling, and terminating your employment relationship and the lawful basis we rely on to process this data:

- Consent: the individual has given clear consent for you to process their personal data for a specific purpose.
- Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering a contract.
- Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).

### **Criminal Conviction Data**

We will only collect criminal conviction data where it is appropriate given the nature of your role and where the law permits us. This data will be collected at the recruitment stage and/or during your employment.

We will use information about criminal convictions or allegations:

- to make decisions regarding suitability for the role
- to satisfy customer clearance requirements for attendance at their premises
- in possible grievance or disciplinary matters and associated hearings

For lawful processing of personal data under special categories and in relation to criminal offences, we rely on processing conditions from chapter 2, article 6 (a, b & c), article 9 (pt 1, 2a, 2b & 2f) and article 10

The lawful basis we rely on to process this data:

- Consent: the individual has given clear consent for you to process their personal data for a specific purpose.
- Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering a contract.
- Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).

Our Data Protection Special Categories & Criminal Offence Data Appropriate Document Policy provides further information about this processing.

### **Purpose of Processing Personal Data**

We may need all the categories of information in the list above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases, we may use your personal data to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests.

The situations in which we will process your personal data are:

- To select suitable candidates
- To conduct security checks such as Disclosure and Barring Service (DBS) checks.
- To check you are legally entitled to work in Ireland.
- If we enter into an employment contract with you, the storage and usage of your personal data is required in order to uphold our obligations and administer the contract we have with you i.e., the payment of your salary or

provision of other salary components, such as benefits, pensions, company cars and other services.

- We also require your data to be able to manage your employment with us, e.g., performance reviews, to comply with any legislation and to train you as an employee, and to develop tailored training activities and career opportunities together with you, including any remuneration reviews.
- Gathering evidence for possible grievance or disciplinary hearings and making decisions about your continued employment or engagement.
- Dealing with legal disputes involving you, or other employees, workers, and contractors, including accidents at work
- Manage absence across all types of leave, including maternity, paternity, adoption, parental and shared parental leave and ascertaining your fitness to work and conduct data analytics reports on employee retention, sickness absence, pay rates.
- Equal opportunities monitoring.
- The Human Resources department will create a personnel file for the management of your personal details. This contains both your applicant details, and any documents and contract amendments resulting from your ongoing employment with dormakaba.
- Depending on your individual role, it is possible that a reliability or security check of your background is required before we can assign you to certain customers or areas (e.g., Disclosure & Barring Service (DBS) check).
- Within the course of human resources development activities (workshops, team training, coaching, management training, individual development measures), personal data is regularly processed in accordance with the objective, purpose, and progress of the activity. Generally, this includes the name of the participants, their professional contact details, and the results of workshops or individual activities.
- If you are contractually entitled to a company car, we are legally obliged to carry out regular checks that you are in possession of a valid driver's license.
- Our Engineers Vans are fitted with vehicle tracking to both safeguard them and to ensure we are utilising the best resource geographically.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution

If we do not enter an employment contract with you, further processing is required in the event of any claims arising from any Employment Tribunal claims.

#### **Lawful Basis of Processing Personal Data**

Under GDPR we will ensure that your personal data is processed lawfully, fairly, and transparently, without adversely affecting your rights. We will only process your personal data if at least one of the following basis applies:

- You have given consent to the processing of your personal data for one or more specific purposes.
- processing is necessary for the performance of a contract to which you are a party or in order to take steps at the request of you prior to entering into a contract.
- processing is necessary for compliance with a legal obligation to which we are subject.
- processing is necessary to protect the vital interests of you or of another natural person and/or;

- processing is necessary for the purposes of the legitimate interests pursued by us or by a third party such as our financial payments, except where such interests are overridden by the fundamental rights and freedoms of the data subject, in particular where the data subject is a child.

### **How we Collect and Use your Data**

We collect personal data about employees, workers, applicants, interns and contractors through the application, recruitment, and onboarding process, either directly from you or sometimes from former employers or employment agencies via references, or it is transferred to us with your consent from other companies in the dormakaba Group or other third parties. We will also collect additional personal data during job-related activities, and throughout your employment with dormakaba efficiently.

Please refer to the HR Data Protection Log for further details, this can be requested from the Data Protection Officer at [gdpr.gb@dormakaba.com](mailto:gdpr.gb@dormakaba.com).

### **Do We Need Your Consent?**

We do not need your consent if we use special categories of your personal information in accordance with our Data Protection Special Categories & Criminal Offence Data Appropriate Document Policy to carry out our legal obligations or exercise specific rights in the field of employment law.

In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

### **What if you do not Provide Personal Data**

You have some obligations under your employment contract to provide the organisation with data. You are required to report absences from work and may be required to provide information about disciplinary or other matters under the implied duty of good faith. You may also have to provide the organisation with data in order to exercise your statutory rights, such as in relation to statutory leave entitlements. Failing to provide the data may mean that you are unable to exercise your statutory rights.

Certain information, such as contact details, your right to work and payment details, have to be provided to enable the organisation to enter a contract of employment with you. If you do not provide other information, this will hinder the organisation's ability to administer the rights and obligations arising as a result of the employment relationship efficiently.

### **Data Retention**

We will delete your personal data, once the purpose of processing has expired, all mutual obligations have been fulfilled and no other legal obligations or justifications for the storage of your data exist to the contrary.

We may, however, be required to retain personal data for a longer period of time to ensure we comply with our employment legislative and regulatory requirements. We

review our data retention obligations to ensure we are not retaining data for longer than we are legally obliged to.

If an application does not result in employment, your application and the associated personal data will be deleted after twelve months to enable us to dispute any claims arising from an Employment Tribunal claim.

### **Data Security**

Data security is of great importance to us, and to protect your data we have put in place suitable physical, electronic, and managerial procedures to safeguard and secure data collected, including

- Restricted User Access
- Password Protection
- IT System Security
- Lock & Key Access

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### **Sharing Personal Information & Transfer out of UK & Ireland to EEA / Third Countries**

We will share personal information with internal departments, dormakaba group entities and third parties where required to do so by law, to fulfil a contract and where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

The following third-party service providers may process personal information about you:

- Legal & HR Advisory Representatives
- Trade Unions
- Labour Relations
- Payroll and Benefit Providers
- Training Providers / Organisations

Please refer to the HR Data Protection Log for further details, this can be requested from the Data Protection Officer at [gdpr.gb@dormakaba.com](mailto:gdpr.gb@dormakaba.com).

We require third party service providers to respect the security of your data and to treat it in accordance with the law.

Where any of your data is required for such purposes, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under GDPR legislation the law. Any third party that we share data with will not be permitted to use it for any other purpose than fulfilling their contract with us.

### **Your Rights**

Under the GDPR Legislation, you have the right to:



- be informed how your personal data is being processed
- access your personal data
- have your personal data rectified
- have your personal data erased
- restrict your personal data from being processed
- data portability (transferred to another person/organisation)
- object to processing of your personal data
- view automated decision-making and profiling, as set out in section "Automated Decision-Making and Profiling."

To enforce any of these rights, or to request a data subject access request (DSAR) form, please contact us at [gdpr.GB@dormakaba.com](mailto:gdpr.GB@dormakaba.com).

### **Am I Required to Provide you with my Personal Data?**

As part of the employment relationship, you must provide the Company with the personal data that is required for the initiation, fulfilment, and termination of the employment relationship and for the fulfilment of the associated contractual obligations, that we are legally obliged to process. Without this data, we are unable to enter or fulfil an employment contract with you.

### **Automated Decision Making and Profiling**

The personal data you provide is not used for:

- Automated decision making (making a decision by automated means without any human involvement)
- Profiling (automated processing of personal data to evaluate certain things about an individual)

### **Other Information**

- CCTV

We have a number of CCTV around the warehouse and building of the following sites:

- Willenhall ([see ADT CCTV Policy](#))
- Lichfield
- Hitchin
- Tiverton
- Falkirk
- Tyne & Wear ([see Hepburn Properties Ltd CCTV Policy](#))
- Ireland ([see Digital Office Centres & Space Storage CCTV Policy](#))

Please refer to our CCTV policy dormakaba UK & Ireland CCTV Policy for more information which can be found here <https://www.dormakaba.com/gb-en/about-us/gdpr>

- Data Processors

We use data processors who will process your personal data on our behalf to support our recruitment or ongoing employment relationship with you.

Please refer to the Data Protection Logs for further details, this can be requested from the Data Protection Officer at [gdpr.gb@dormakaba.com](mailto:gdpr.gb@dormakaba.com)

- Security Passes

These are used and required for security and access control.

### **Complaints**

We will use our best efforts to negotiate in good faith and settle any dispute that may arise out of or relate to this Privacy Policy or any breach of it

If you have any questions about this privacy notice or how we handle your personal data, please contact the Data Protection Officer at [gdpr.gb@dormakaba.com](mailto:gdpr.gb@dormakaba.com).

You also have the right to complain to the data protection commission in Ireland

Data Protection Commission  
21 Fitzwilliam Square South  
Dublin 2  
D02 RD28  
Ireland

<https://www.dataprotection.ie/en/individuals>

And to the Information Commissioner's Office in the UK

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

<https://ico.org.uk/make-a-complaint/data-protection-complaints/>

### **Change to the Privacy Policy**

We reserve the right to update this privacy notice at any time and we will update the privacy notice on our internet site when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

Thank you for taking the time to read our data protection information for applicants and employees.

Last Review Date: 16/11/23

Next Review Date: 13/07/23