

# GDPR PRIVACY NOTICE FOR EMPLOYEES AND CONTRACTORS

## 1. Purpose of this privacy notice

BMI Group and its legal entities (together, “BMI Group” or the “Company”) operate in countries around the world, including in the European Union (“EU”) and the United Kingdom (“UK”).

This privacy notice (“Notice”) describes how your employer as a controller within BMI Group (“we” or “us”) collects and uses personal data about you during and after your working relationship with us under the GDPR and UK GDPR (together, the “GDPR”). For more information about your own responsibilities in handling personal data as a staff member, please refer to BMI Group’s Data Privacy Policy.

The BMI Group entity you are employed or engaged by will be a “controller” for the purposes of GDPR. As a controller we are responsible for deciding how we hold and use personal data about you. From time to time additional specific privacy notices will be provided to you where a controller within BMI Group will process personal data other than as anticipated in this notice, for example when rolling out a significant new IT system.

## 2. Scope of this privacy notice

This Notice applies to all employees and contractors of BMI Group unless a local Privacy Notice takes precedence.

## 3. Data categories: the type of information we hold and process about you

The types of personal data we collect and process when you apply for a role with BMI, the purposes for processing, sources of data and legal bases for processing includes (but is not limited to):

Categories of data	Source	Purpose for processing	Legal basis
<b>Recruitment data</b>			
<b>Identification data and contact details</b> – including your name, address, email address, phone number and other contact information, gender, date of birth,	You	To contact you during the recruitment process and to process your application.	Legitimate interest: we have a legitimate interest in processing the applications of individuals who have expressed an interest in working for us and for contacting such applicants about roles available.

Categories of data	Source	Purpose for processing	Legal basis
nationality/ies, national identifiers (such as national ID/passport, social security number(s)).			Necessary to perform the contract: Processing this data is necessary for us to take steps at your request prior to entering a contract with you i.e. by knowing who you are and contacting you about your application.
<b>Employment history</b> – such as previous employers and job titles/positions.	You	To assess your suitability.	<p>Legitimate interest: We have a legitimate interest in reviewing your employment history to assess your suitability for employment with us.</p> <p>Necessary prior to contract: It is necessary for us to assess your suitability before we enter into an employment contract with you.</p>
<b>Background information</b> – such as academic/professional qualifications, job qualifications, education, details included in your CV/résumé (which might include details of any memberships or interests constituting sensitive personal data), transcripts and employment references.	You	To assess your suitability.	<p>Legitimate interest: we have a legitimate interest in reviewing your background information, including academic qualifications, in order to assess your suitability.</p> <p>Necessary prior to contract: It is necessary for us to assess your suitability before we enter into an employment contract with you.</p>
<p>Details of your <b>nominated referees</b> (including their name, contact details, employer and job role).</p> <p>References from those nominated referees.</p>	You or your referee	To assess your suitability and to verify the information that you have provided.	<p>Legitimate interest: we have a legitimate interest in verifying the information that you have provided to us and assessing your suitability for a role.</p> <p>Necessary prior to contract: It is necessary for us to assess your suitability and verify your experience before we enter into an employment contract with you.</p>
Other background information provided or confirmed by <b>academic institutions and</b>	Academic institutions/training certification providers.	To assess your suitability and to verify the information that you have provided.	Legitimate interest: we have a legitimate interest in verifying academic or training certifications to assess your suitability.

Categories of data	Source	Purpose for processing	Legal basis
<b>training or certification providers.</b>			Necessary prior to contract: It is necessary for us to assess your suitability and verify relevant background information before we enter into an employment contract with you.
Information provided by <b>recruitment or executive search agencies.</b>	Recruitment agencies.	To assess your suitability and to verify the information that you have provided.	<p>Legitimate interest: we have a legitimate interest in assessing your qualifications to assess your suitability.</p> <p>Necessary prior to contract: It is necessary for us to assess your suitability before we enter into an employment contract with you.</p>
Information collected from <b>publicly available sources</b> that is relevant to your application, including relevant social media platforms you use (such as LinkedIn or other platforms where you showcase your experience) or other relevant information available online.	Publicly available sources	To assess your suitability and to verify the information that you have provided.	Legitimate interest: we have a legitimate interest in reviewing publicly available information in order to assess your suitability and verify the information you have provided.
<b>Previous applications/roles</b> (information relating to previous applications you have made to the BMI Group and/or any previous employment history with BMI).	You	To assess your suitability.	<p>Legitimate interest: we have a legitimate interest in considering previous BMI applications/employment to assess suitability.</p> <p>Necessary prior to contract: It is necessary for us to assess your suitability before we enter into an employment contract with you.</p>
<b>Other information you voluntarily provide</b> throughout the process, including through assessment centres / exercises and interviews.	You	To assess your suitability.	Legitimate interest: we have a legitimate interest in order to assess your suitability. An example of this may be an applicant disclosing that they are a trustee of a charitable organisation.
<b>Aptitude tests and personality tests</b>	You	To assess your suitability.	Legitimate interest: we have a legitimate interest in assessing your suitability for the applicable role. Such tests help us to determine whether you may be a

Categories of data	Source	Purpose for processing	Legal basis
			suitable candidate.
<b>Employment/Service Contract</b>			
<b>Identification data and contact details</b> – including your name, address, email address, phone number and other contact information, gender, date of birth, nationality/ies, national identifiers (such as national ID/passport, social security number(s)).	You	To ensure that we have the appropriate details to contact you and administer your contract.	Necessary to perform the contract: Processing this data is necessary for us to take steps at your request prior to entering a contract with you i.e. by knowing who you are and contacting you about your application and to consider administering your contract.
<b>Payment data:</b> national Insurance number, social security number or equivalent; bank account details, payroll records and tax status information	You	To ensure that we are able to pay you as per your contract.	Necessary to perform the contract: Processing this data is necessary for us to pay you as per your contractual entitlement and to make the appropriate deductions for [national insurance] and tax purposes.
<b>Pension and benefits information,</b> including annual leave entitlement and any maternity/ paternity/ adoption or shared parental leave.	You Benefits providers Pension providers	To administer your pension and benefit entitlements.	Necessary to perform the contract: Processing this data is necessary for us to be able to administer your pension and benefit entitlements.
<b><u>Sickness absence dates and sickness leave entitlement</u></b>	You	To administer your pay in accordance with the correct policies and stator regime on sickness pay.	Necessary to perform the contract: Processing this data is necessary for us to pay you as per your contractual entitlement and to make the appropriate deductions.
Next of kin and <b>emergency contact</b> information	You	To contact in the event of an emergency.	Legitimate interests: we have a legitimate interest in contacting your next of kin/emergency contact in appropriate circumstances.
<b>CCTV footage</b> and other information obtained through electronic means such as swipe card records.	CCTV and swipe card providers	To prevent and detect crime and to ensure safe access to our offices.	Legitimate interests: we have a legitimate interest in ensuring safe, secure and restricted access to our premises.

Categories of data	Source	Purpose for processing	Legal basis
<b>Performance information;</b> disciplinary and grievance information	You Other members of staff	To monitor performance.  To conduct the disciplinary and grievance process to ensure a safe working environment.	Necessary to perform the contract: we need to process this information to conduct the disciplinary and grievance procedure.  Legitimate interests: we have a legitimate interest in assessing and monitoring performance [to ensure that we uphold specific standards.
Information about your use of our <b>information and communications systems.</b>	Our IT and communications systems	To ensure our systems are used in accordance with relevant policies.	Legitimate interests: we have a legitimate interest in ensuring that our IT and communications systems are used in accordance with our relevant policies.
<b>Photographs</b>	You and any Company photographers	To ensure that we have an up-to-date and complete employee/contractor directory.	Legitimate interests: we have a legitimate interest in having an employee/contractor directory, to enable staff to work together with ease.
<b>Special Category Personal data</b>			
Details of your <b>immigration/visa status.</b>	You	To verify that you have the right to work, for example, in the UK.	Legal obligation – right to work checks.  For example, in the UK: Where it is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on us or you in connection with employment as described in Sch.1, Part 1, Section 1, Data Protection Act 2018.  Necessary prior to contract: It is necessary for us to understand your legal right to work before we enter into a contract with you.
Racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health, or data concerning a natural person's sex	You	In certain circumstances, we may need to collect, or request on a voluntary disclosure basis where permitted under applicable law, some Special Category Personal data for legitimate purposes: for example, information	Legal obligations: where required by applicable law to provide reasonable adjustments during the recruitment period and/or where required by applicable law to monitor diversity.  For example, in the UK: Where it is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on

Categories of data	Source	Purpose for processing	Legal basis
life or sexual orientation.		about your racial/ethnic origin, gender and disabilities for the purposes of equal opportunities monitoring, to comply with anti-discrimination laws and for government reporting obligations; or information about your physical or mental condition to consider reasonable accommodations.	us or you in connection with employment as described in Sch.1, Part 1, Section 1, Data Protection Act.]  Legitimate interest: we have a legitimate interest in ensuring our recruitment practices are fair and provide equality of opportunity.
Trade union membership information	You Your trade union	We will use trade union membership information to pay trade union premiums, register the status of a protected employee and to comply with employment law obligations.	For example, in the UK: Where it is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on us or you in connection with employment as described in Sch.1, Part 1, Section 1, Data Protection Act.
<b>Criminal Records Data</b>			
<b>Criminal records data</b> obtained through criminal records checks.	Third party background check entities and/or applicable government record databases	To assess your suitability. These checks will only be carried out where necessary for a particular role and permissible under applicable law.	Legitimate interest: to assess the suitability of candidates.  Legal obligation: in certain circumstances and for particular roles, BMI may be legally obligated to conduct a criminal record check.  For example, in the UK: Where it is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on us or you in connection with employment as described in Sch.1, Part 1, Section 1, Data Protection Act.

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our personnel).

## 4. Data sharing

We need to work with carefully selected partners in order to review and process your application and administer your engagement with us. We take care to allow access to personal data only to those who require such access to perform their tasks and duties, and to third parties who have a legitimate purpose for accessing it. Whenever we permit a third party to access personal data, we will implement appropriate measures to ensure the information is used in a manner consistent with this

Notice and that the security and confidentiality of the information is maintained.

We may share your personal data with the following categories of recipients:

### 4.1 Transfers to third parties

We will share your personal data with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so. For example, we may transfer your personal data to third parties who carry out the following activities: payroll; pension administration; benefits provision, and administration and IT services. For example, we use WorkDay for human resources management and Google for Information Technology platform capabilities. Data Protection Agreements are in place with both parties.

All our third party service providers are required to take appropriate security measures to protect your personal data in line with our policies. We only permit third party service providers to process your personal data for specified purposes and in accordance with our instructions.

We may also share your personal data with other third parties, for example in the context of the possible sale or restructuring of the business. In this situation we will, so far as possible, share anonymised data with the other parties before the transaction completes. Once the transaction is completed, we will share your personal data with the other parties if and to the extent required under the terms of the transaction.

We may need to share your personal data with a regulator or to otherwise comply with the law such as tax authorities, immigration bodies and pensions regulators.

### 4.2 Transfers to other BMI Group entities

We transfer HR data between various BMI entities as we utilize a central HR system. Other BMI group entities may provide data processing services to us (for example, to support the delivery of, provide functionality on, or help to enhance the security of, the HR system, or as part of routine company reporting, or who otherwise process personal data for purposes that are described in this Notice. A list of our current group companies to whom we transfer personal data and the relevant country/territory is available by contacting [Compliance@BMIGroup.com](mailto:Compliance@BMIGroup.com). All transfers are governed by a Global Intra Group Agreement with Standard Industries and its affiliates and subsidiaries.

## 5. Transferring Information Outside the UK/EU

The sharing described above may result in your personal data being **transferred internationally**,

**including from the UK or EU to an outside country.** These countries may have data protection laws that are different to the laws of your country (and, in some cases, may not be as protective).

## 5.1 Transfers within the BMI Group

All personal data entered into our central HR system is hosted by WorkDay in the United States and for the reasons described above, might be accessed or further shared by other Standard Industries Group companies, which are located in countries worldwide. Please see the details set out in the "Data Sharing" section above. We ensure that such transfers are

lawful and that there are appropriate security arrangements.

We have entered into an agreement ensuring appropriate and suitable safeguards with our BMI Group members. This agreement includes the [European Commission's Standard Contractual Clauses](#) as issued on 4 June 2021 in particular module one for Controller to Controller and module two for Controller to Processor transfers (as permitted under Article 46 GDPR). BMI has also annexed the UK's [International Data Transfer Addendum](#) accordingly to this agreement (as permitted under Article 46 UK GDPR)].

Where our intra-group transfers involve us transferring your personal data to countries and territories outside of the EU and the UK, which have been formally recognised as providing an adequate level of protection for personal data, we rely on the relevant "adequacy decisions" from the European Commission and "adequacy regulations" from the Secretary of State in the UK.

## 5.2 Transfers to other organisations

BMI utilizes third-party service providers that operate around the world, including some that are located outside of the UK/EU. Please see the "Data Sharing" section above for more details on the types of personal data transferred and locations of key service providers.

For all transfers, we have taken appropriate safeguards to require that your personal data will remain protected in accordance with this Notice.

## 6. Data retention

Personal data will be stored in accordance with applicable laws and kept as long as needed to carry out the purposes described in this Notice or as otherwise required by applicable law. If you have a specific question about how long a category of personal data is retained, please contact us at [privacy@BMIGroup.com](mailto:privacy@BMIGroup.com).

## 7. Data Protection Rights

You may exercise the rights available to you under applicable data protection laws as follows:

- If you wish to access, correct, update or request deletion of your personal data, you can do so at any time by emailing [privacy@BMIGroup.com](mailto:privacy@BMIGroup.com).
- You can object to processing of your personal data, ask us to restrict processing of your personal data or request portability of your personal data. Again, you can exercise these rights by emailing [privacy@BMIGroup.com](mailto:privacy@BMIGroup.com).
- If we have collected and processed your personal data with your consent, then you



can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal data conducted in reliance on lawful processing grounds other than consent.

- You have the right to complain to a data protection authority or the information Commissioner's Office (depending on your location) about our collection and use of your personal data. You can find details of all EU authorities [here](#). We would prefer - and in fact many data protection authorities require - you to raise any grievance with us first, though you are not obligated to.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

## 8. Data Protection Officer

BMI Group has appointed a data protection officer, Sebastian Kraska. You can contact him directly at [BMIGroup@iitr.de](mailto:BMIGroup@iitr.de) or [privacy@BMIGroup.com](mailto:privacy@BMIGroup.com).

## 9. Changes to this privacy notice

This notice does not form part of any employee's contract of employment or any consultant's terms of service and we reserve the right to update this notice at any time, and we will provide you with a new notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.

## 10. Contact

Any BMI Group employee, worker or contractor can direct questions regarding this notice to [privacy@BMIGroup.com](mailto:privacy@BMIGroup.com).