



Vodafone Group Services Limited / Vodafone Sales and Services Limited External Workforce Privacy Statement

Policy Standards Supported / Objective	
<p>The objective of this statement is to explain how Vodafone collects, use, shares and protects your personal information.</p> <p>This document supports the Privacy Risk Management Standard and the following principles:</p> <ul style="list-style-type: none"> • Vodafone is committed to process personal information honestly, ethically, with integrity, and always consistent to applicable law and our values • Vodafone is transparent about the personal information we collect, use, share and store. • People working at Vodafone understand how Vodafone collects and processes their personal information and their rights with respect to this personal information. 	Owner
	Author
	Version

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Vodafone Group Services Limited (or "VGSL") / Vodafone Sales and Services Limited (or "VSSL) are the controller of your personal information that is collected and processed subject to your engagement with Vodafone. We are a member of the Vodafone Group and manage operations, including the processing of personal information about the workers engaged by VGSL/VSSL.



Our registered office is Vodafone House, The Connection Newbury, Berkshire RG14 2FN. We are registered in England under company number 03802001. We provide details of how to contact us in the **How to contact us** section of this privacy statement.

However, the supplier you are supplied by or engaged with may also be a data controller for certain personal information that they collect, process and share with Vodafone. This will be governed by their own privacy policy. You should contact the supplier you are engaged with or supplier by, directly for more information about their privacy policy and how they process your personal information.

2 Definitions

In this privacy statement:

“we/us” means Vodafone Group Services Limited and Vodafone Sales and Services Limited;

“third party” means someone who is not you or us or a part of Vodafone Group; and

“Vodafone” or “Vodafone Group” means Vodafone Group Plc and any company or other organisation in which Vodafone Group Plc owns 50% or above of the share capital.

3 The Basics

3.1 Personal information we collect about you

3.1.1 Vodafone will process your personal information based on

1. **The performance of a contract with Vodafone** subject to the terms of the agreement between Vodafone and the supplier you are supplied by or engaged through, or your engagement agreement with Vodafone;
2. **Vodafone’s legitimate business interest**, including for example, managing your engagement with and/or work for Vodafone, fraud prevention, maintaining the security of our corporate network and internal systems;
3. **Compliance with a mandatory legal obligation**, where certain information is necessary to satisfy a legal or regulatory requirement, subject to strict internal policies and procedures which control the scope of legal assistance to be provided;
4. **Consent you provide**, where Vodafone does not rely on another legal basis or in addition to performance of contract or reliance on our legitimate business interests, you choose to provide us with your personal information and the processing of that information is voluntary, including for example, when you take part in events organised by Vodafone. Your consent can be withdrawn at any time.

3.1.2 How we collect information about you

We collect personal information about you from our external workforce suppliers or from you directly when you are engaged to work at Vodafone, for example, your name and contact details including your telephone number and email address. Other personal information we collect about you is subsequently generated during the course of your engagement with Vodafone by our corporate network, internal processes and applications and our arrangement or contract with the external workforce supplier.

3.1.3 The types of personal information we may collect about you are, for example:

- a) **Personal details**, such as name, address, personal email address, telephone number, emergency contact details, proof of identity;
- b) **Role information**, means role related information such as an identification number, contact details, role title, job description (as applicable);
- c) **User Authentication information**, such as your username and password required to log in to the Vodafone corporate network;



- d) **Your use of Vodafone devices and corporate network**, services, systems, networks, accounts and corporate communications. Please see [3.2.1 Monitoring and assuring compliance with Vodafone policies](#) below for more information;
- e) **Security in the workplace**, such as onsite CCTV footage and access card records;
- f) **Cookies**, on certain internal sites pages and Vodafone intranet.

3.2 How we use information about you

We may process the personal information that we collect about you for the following purposes:

- a) **Administering your engagement**, such as organising interviews and on boarding or processing time sheets where required;
- b) **Access management**, such as to give you physical access to Vodafone premises and access to the corporate network and applications when required;
- c) **Communication & involvement**, such as where you register for internal networks or events;
- d) **Maintaining health, safety and wellbeing**, such as managing safety and wellbeing incidents;
- e) **Organisation effectiveness & change**, such as internal reporting or analysis to support business and cultural change or reviewing organisational effectiveness. For example, the proportion of external workforce in different functions or at office locations in the business;
- f) **Monitor compliance with Vodafone policies**, such as information security or completion of any mandatory compliance training where required. Please see [3.2.1 Monitoring and assuring compliance with Vodafone policies](#) below for more information;
- g) **Meeting our legal and regulatory obligations when you are engaged by Vodafone.**
- h) **Meeting our contractual obligations with our external workforce suppliers.**

3.2.1 Monitoring and assuring compliance with relevant Vodafone policies

In order to assure Vodafone is compliant with its internal policies, we may process your personal information for the purposes of monitoring your compliance with the relevant internal Vodafone policies. You will find these policies on the [Global Policy Portal](#). This information may be processed in the course of an investigation into such a matter for example, where it is alleged or suspected that there has been unauthorised or inappropriate use of Vodafone systems.

In order to protect Vodafone business, employee and customer information, as well as the integrity of our IT systems, we monitor your use of any:

- Vodafone owned equipment (for example a company laptop, tablet and phone);
- User owned devices (for example user owned devices that are used to access Vodafone's systems and to access, process, store and transmit Vodafone's corporate data);
- Corporate networks (for example your access to document management systems, your use of internal networks and your online browsing); and
- Corporate communications accounts (for example your messages sent via Outlook, Yammer, Skype for Business – this can include, in certain circumstances, viewing the content of your messages).

Please note: Information will only be captured or viewed when it, has been, moved or sent in breach of Vodafone's **Information Security Policy**, even when you are not connected to the VPN, and subject to applicable national laws. You will find this policy on the [Global Policy Portal](#).

For example, we routinely scan our workforce's use of our corporate network and corporate communications accounts to detect threats such as computer viruses, attempts to access suspicious third party websites, unauthorised access attempts and internal misuse (such as a breach of our information



security policy). Similarly, software in your work device monitors the flow of information leaving your device and would alert a breach as soon as your device reconnected to the VPN.

We encourage you to read our [Acceptable Usage Guidance](#) which explains how to use any Vodafone owned equipment and your user owned devices, networks and communications accounts in compliance with internal company policy. You can also find more about our information security practices in our [Information Security Policy](#). You can find these security policies on the [Global Policy Portal](#).

In some circumstances (for example if an internal investigation is opened, or Vodafone is subject to disclosure/discovery procedures as part of a regulatory investigation or legal proceedings) we may:

- remotely monitor your usage of our work devices, networks and communications accounts as outline above – in more detail;
- require you to hand in your work device to be forensically analysed (**Please note:** that if you store personal information, such as photos, documents or apps, onto the hardware of your work device these could be accessed by an investigator in the course of conducting their forensics); or
- Other means deemed necessary to conduct and conclude an investigation subject to Vodafone's legitimate interests and applicable national law.

Information gathered from such investigations could be used in subsequent regulatory, disciplinary or legal proceedings. For more information please read our [Investigation Policy](#) on the [Global Policy Portal](#).

For clarity, we do not, under any circumstances, monitor your usage of work devices when you are:

- Using your Vodafone owned phone or tablet outside of work apps (for example, when you use your work phone to download and use apps like Facebook, Netflix, MyVodafone and Amazon or to take photos); or
- Saving personal information, such as photos, documents or apps, onto personal use cloud accounts (e.g. Google Docs, Dropbox or Facebook) from your work device (but our forensic investigators do potentially have access to personal information you save to the hard drive of your work device).

For further information, please see section 7 'Specific information for your country' in this privacy statement.

3.2.2 Analytics and automated decision making

We may process the personal information that we collect about you to do reporting and analytics for the purposes identified in section 3.2 of this statement. By way of brief summary:

- Many use cases will solely generate **anonymous, aggregate insights** which do not identify you personally;
- However, some use cases may involve **profiling** which means evaluation, analysis or prediction of aspects concerning you and your performance when working at Vodafone, including for example for the purposes of performance and reporting to our external workforce supplier or fraud prevention.

We do not use analytics for **automated decision-making** (that is, decision making with no human involvement) which would produce legal effects or other similar significant impacts on you. Rather the insights generated by the analytics are used to provide additional insights and data points to inform our activities, for example, relating to reporting or business planning. You may learn about our analytics activities through the local Privacy Officer. Their contact details are available under section 8 'Specific information for your country'.



3.3 Who we share information about you with

We may share personal information about you with:

- Companies in the Vodafone Group;
- External workforce suppliers for the purposes of administering your engagement with Vodafone;
- Companies or consultants who are engaged to perform services for, or on behalf of Vodafone Group or a company in the Vodafone Group, including for example, those who process our benefits and discount schemes or manage our premises;
- Law enforcement agencies, government bodies, regulatory organisations, courts or other public authorities if we have to, or are authorised to by law;
- A third party or body where such disclosure is required to satisfy any applicable law, or other legal or regulatory requirement;
- In conjunction with any merger, sale or acquisition of a company in the Vodafone Group.

3.4 Where we process information about you

In doing the above, we may need to transfer personal information about you to other companies in the Vodafone Group or third parties located (or whose servers may be located) in countries outside of where you are engaged, including countries outside of the European Economic Area (EEA). If we send personal information about you to a country that is not in the EEA, we will make sure that there is a legal basis for such transfer and that your personal information is adequately protected as required by applicable law, for example, by using standard agreements approved by relevant authorities and by requiring the use of other appropriate technical and organizational measures to protect your personal information.

Please contact the local Privacy Officer if you would like to find out more about the way we comply with our legal obligations in relation to international data transfers. Their contact details are available under section 8 'Specific information for your country'.

3.5 How long we keep information about you

We'll store your information for as long as we have to by law. If there's no legal requirement, we'll only store it for as long as we need to. Generally, this means that we will retain your information for as long as you are engaged by Vodafone, and after you leave we retain some of that information for long as is necessary to fulfil any legal or regulatory requirements and the purposes for which it was collected as prescribed by the law, for example when your engagement with Vodafone ends, we will keep your information for the relevant limitation period in which you or the external workforce supplier could bring a claim against Vodafone.

4 Your rights

- Right to correct or update information:** you have the right to have the information we hold about you corrected if it is not accurate. If the information we hold about you needs updating, or you think it may be inaccurate, you can contact askhrgroupuk@vodafone.com;
- Right to access:** want a copy of the personal information we hold on you? You can apply for a copy of your personal information by contacting askhrgroupuk@vodafone.com;
- Right to object:** you have the right to object to the processing of your personal information where we rely on our legitimate ground to do so for example, for analytics and profiling use cases where you are identified personally (see section 4.2.2). Your objection will be balanced against our specific legitimate ground for processing. You can request to object to processing by contacting askhrgroupuk@vodafone.com;
- Right to deletion:** in certain circumstances you have the right to request that we erase the personal information we hold about you. You can request for your information to be deleted by contacting askhrgroupuk@vodafone.com;



- e) **Right to restrict use of your information:** if you feel the personal information we hold about you is inaccurate or believe we shouldn't be processing your personal information, you may have the right to ask us to restrict processing that information. You can request to restrict processing by contacting askhrgroupuk@vodafone.com;
- f) **Right to data portability:** in certain circumstances you will have the right to take the personal information you have provided to us with you. You can raise a request for data portability by contacting askhrgroupuk@vodafone.com.

If we don't take action based on any of the above requests, we will inform you of the reasons why.

Please note, Vodafone is only a data controller for the personal information collected, processed and stored for the purposes outlined in this Privacy Statement. The supplier you are supplied by or engaged with may also be a data controller for certain personal information that they collect, process and share with Vodafone. This will be governed by their own privacy policy. You should contact the supplier you engaged with or supplied by directly for more information about their privacy policy and how to exercise your data subject rights with them.

5 Changes to this Privacy Statement

This privacy statement gets updated from time to time, so we'd encourage you to check it regularly. If we make a major change, we'll post this on the Fieldglass platform and the Global Policy Portal.

6 How to contact us

If you have any further questions about this privacy statement or how we process your information, please contact your local Privacy Officer. Their contact details are available in section 8 'Specific information for your country'. We'll do our best to help but if you're still unhappy, you can contact the Information Commissioner's Office (ICO) – specific details of which are contained in section 8 'Specific information for your country' in this privacy statement.

7 Specific information for your market

If you have any further questions about this privacy statement or how we process your information, please contact the Group Privacy Officer by email: ask.groupprivacy@vodafone.com

If you are unhappy about how we process your personal information, you can contact the Information Commissioner's Office (ICO), registration number Z802136X. Contact details can be found [here](#).

8 Document History

Vers.	Date	Changes	Approved by
1.0	22/01/2019	Version 1.0	DPO