

| OUR APPROACH TO PRIVACY:

Keyrus is committed to protecting and respecting the privacy of our employees, directors, agency workers, interns, consultants and contractors who are engaged by us ("**staff**" or "**you**").

This privacy notice sets out how we collect, store, process, transfer, share and use information that relates to you ("**personal information**").

Please ensure that you have read and understood how we collect, store, use and disclose your personal information as described in this privacy notice.

This privacy notice does not form part of any contract of employment or other contract to provide services. We may update this privacy notice in accordance with paragraph 9.

| ABOUT US:

[Keyrus Limited] (company no. [05394416]) ("**Keyrus**", "**we**", "**our**", or "**us**") is the data controller of the personal information we hold about you.

| PERSONAL INFORMATION WE COLLECT ABOUT YOU AND HOW WE USE IT

We collect personal information that you voluntarily submit directly to us, such as when you submit your application to us, communicate with us in respect of your employment (or engagement) or when you fill in certain forms at the start of your employment. This can include your name, address, emergency contacts, education and qualification details, and salary and benefits details.

When we collect such information from you, we will inform you if the information is mandatory or optional. If you do not provide any information which is marked as mandatory, we may be unable to perform some of our obligations to you.

We may collect personal information about you from other parties, such as information provided by recruiters, executive search firms and referees.

We may also create and maintain internal records which may contain personal information about you, such as application or interview evaluation notes.

The table in **Annex 1** sets out the categories of personal information we collect about you and how we use that information. The table also lists the legal basis which we rely on to process the personal information and the recipients of the personal information.

| **DATA RETENTION:**

We will store the personal information we collect about you for no longer than is necessary for the purposes set out in Annex 1 and to satisfy any legal, regulatory, tax, accounting, reporting or other legitimate requirements. We may retain your personal information for a longer period if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

In all cases, data held by us will only be retained in accordance with our data retention policy and applicable legal requirements.

| **RECIPIENTS OF PERSONAL INFORMATION:**

We may share your personal information with the following (as required in accordance with the uses set out in Annex 1):

OTHER AFFILIATES OF THE KEYRUS GROUP:

Personal information may be transferred within our group (a list of our group companies may be requested using the contact details below) in connection with: personal information may be transferred within our group (a list of our group companies may be requested using the contact details below) in connection with:

- ⦿ The provision of centralised IT and human resources management;
- ⦿ Group business planning, budgeting, accounting, reporting and strategy;
- ⦿ Group-level legal and regulatory compliance and managing associated risks, providing legal advice and in connection with potential or actual litigation;
- ⦿ Providing and administering whistleblowing schemes;
- ⦿ Reporting, assessing and responding to claims for risk management.

SERVICE PROVIDERS AND ADVISORS:

We may share your personal information with third party vendors and other service providers who perform services for us or on our behalf, which may include providing mailing or email services, tax and accounting services, employee benefits and payroll and payments processing. Such data may be disclosed in connection with:

- ⦿ The provision of centralised IT and human resources management;
- ⦿ The provision of processing of salary and benefits;
- ⦿ Obtaining professional services such as legal and accountancy services.

PURCHASERS AND THIRD PARTIES IN CONNECTION WITH A BUSINESS TRANSACTION:

Your personal information may be disclosed to third parties in connection with a transaction, such as a merger, sale of assets or shares, reorganisation, financing, change of control or acquisition of all or a portion of our business.

THIRD PARTIES AT YOUR REQUEST:

We may disclose your personal information where you ask us to, such as to banks or mortgage providers, or other employers if you have chosen us to be a reference when you apply for another position.

THIRD PARTIES, AS NECESSARY IN CONNECTION WITH YOUR JOB ROLE:

We may disclose certain personal information, such as your name and contact details, to third parties who may need to contact you in connection with your role (for example, a project you are working on).

LAW ENFORCEMENT, REGULATORS AND OTHER PARTIES FOR LEGAL REASONS:

We may share your personal information with third parties as required by law or if we reasonably believe that such action is necessary to (i) comply with the law and the reasonable requests of law enforcement; (ii) detect and investigate illegal activities and breaches of agreements; and/or (iii) exercise or protect the rights, property, or personal safety of Keyrus, our staff or others.



CONSENT:

We may need your consent for some uses of certain personal information. If we need your consent, we will notify you of the personal information we intend to use and how we intend to use it.

You do not have to give us consent. Where you have given us consent to collect, use or disclose your personal information in a certain way, you may withdraw your consent at any time. If you wish to withdraw any consent that you have given us, please contact us using the details below.



STORING AND TRANSFERRING YOUR PERSONAL INFORMATION:

SECURITY:

We implement appropriate technical and organisational measures to protect your personal information against accidental or unlawful access, use, destruction, loss, change or damage. All personal information we collect will be stored on secure servers. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. Despite the precautions we take, and although we will do our best to protect your personal information, we cannot guarantee the security of information transmitted over the Internet or that unauthorised persons will not obtain access to personal information.

INTERNATIONAL TRANSFERS OF YOUR PERSONAL INFORMATION:

The personal information we collect may be transferred to and stored in countries outside of the jurisdiction you are in where Keyrus group members and our third party service providers have operations. If you are based in the UK, your personal information may be processed outside of the UK; these international transfers of your personal information will be made based on reliance on an adequacy decision issued by the appropriate regulatory body or pursuant to appropriate safeguards we put in place, in particular standard contractual clauses adopted by the UK or European Commission as applicable. If you wish to enquire further about these safeguards used, please contact us using the details set out at the end of this privacy notice.



YOUR RIGHTS IN RESPECT OF YOUR PERSONAL INFORMATION:

In accordance with applicable privacy law, you have the following rights in respect of your personal information that we hold:

RIGHT OF ACCESS:

You have the right, subject to exceptions under law, to obtain access to your personal information.

RIGHT OF PORTABILITY:

You have the right, in certain circumstances, to receive a copy of the personal information you have provided to us in a structured, commonly used, machine-readable format that supports re-use, or to request the transfer of your personal information to another person.

RIGHT TO RECTIFICATION:

You have the right to obtain rectification of any inaccurate or incomplete personal information we hold about you without undue delay. Please keep us informed if your personal details change during your working relationship with us. We may ask you to verify any new data that you provide to us and may, if necessary, take our own steps to check that the new data you have supplied us with is right.

RIGHT TO ERASURE:

You have the right, in some circumstances, to require us to erase your personal information without undue delay if the continued processing of that personal information is not justified. Please note that we are not always obliged to erase personal information when asked to do so. If for any reason we believe that we have a good legal reason to continue processing personal information that you ask us to erase we will tell you what that reason is at the time we respond to the request.

RIGHT TO RESTRICTION:

You have the right, in some circumstances, to require us to limit the purposes for which we process your personal information if the continued processing of the personal information in this way is not justified, such as where the accuracy of the personal information is contested by you.

RIGHT OF OBJECTION:

You also have a right, in some circumstances, to object to any processing based on our legitimate interests. There may, however, be compelling reasons for continuing to process your personal information, and we will assess and inform you if that is the case.

RIGHT TO WITHDRAW CONSENT:

If you have provided consent to any processing of your personal information, you have a right to withdraw that consent. This would not affect the lawfulness of the processing based on consent prior to the withdrawal.

Please note that the above rights are not absolute and we may be entitled to refuse requests, wholly or partly, where exceptions under the applicable law apply. For example, we may refuse to comply with a request if it is manifestly unfounded or excessive.

If you wish to exercise one of these rights, please contact us using the contact details at the end of this privacy notice.

When you write to us making a request to exercise your rights, we may need to request specific information from you to help us confirm your identity (particularly, for example, if you have left us and are contacting us using a personal email address). It will also help us to process your request if you clearly state which right you wish to exercise, what personal information it is that is of particular concern to you and, where appropriate, why it is that you are exercising it.

Whilst we would of course prefer that you direct any complaints, issues or queries you have to us first, and give us a reasonable opportunity to handle your complaint, issue or query, you also have the right to lodge a complaint to the UK Information Commissioner's Office. Please see www.ico.org.uk for further information on how to contact the ICO.



CHANGES TO THIS NOTICE:

We may update this privacy notice from time to time and so you should review this notice periodically . When we change this privacy notice in a material way, we will inform you.



CONTACTING US:

Please contact Angela Jean-Pierre, assistant financial controller. If you have any questions, comments and requests regarding this privacy notice.

This privacy notice was last modified on 4th April 2023.

| Category of personal information | Source | How we use it | Legal basis for processing | Categories of recipient(s) |
|--|---|--|---|--|
| Work contact details (title, first name, last name, email, telephone number; internal identification number system usernames, photographs) | Provided directly by staff or generated by Keyrus | <ul style="list-style-type: none"> -Open and maintain staff records -Communicate with staff for internal business purposes, relationship management or emergencies -Maintain an internal staff directory -Grant access to internal systems -Auditing, financial and accounting purposes -Business management, planning and restructuring | Legitimate interests (to properly administer our staff) | <ul style="list-style-type: none"> -Other members of the Keyrus group -Service providers and advisors -Third parties, as necessary in connection with your job role |
| Personal contact details (title; first name; last name, email; date of birth; home address, telephone number) | Provided directly by staff | <ul style="list-style-type: none"> -Maintain staff records -Communicate with staff in an emergency -Communicate with staff regarding their employment relationship -Auditing, financial and accounting purposes | Compliance with legal obligation | <ul style="list-style-type: none"> -Other members of the Keyrus group -Service providers and advisors |

| Category of personal information | Source | How we use it | Legal basis for processing | Categories of recipient(s) |
|---|---|---|--|---|
| Nationality, citizenship and right to work information (country of birth; government identification numbers, passport number (and possibly a copy of visa information)) | Provided directly by staff | <ul style="list-style-type: none"> -Maintain staff records -Checking whether you are legally entitled to work for us and in the UK; -Manage, forecast and assess human resources -Auditing, financial and accounting purposes | Compliance with legal obligation | <ul style="list-style-type: none"> -Other members of the Keyrus group -Service providers and advisors -Law enforcement, regulators and other parties for legal reasons |
| Job role information (positions held, job description, responsibilities and assignments, years of service) | Generated by Keyrus | <ul style="list-style-type: none"> -Maintain staff records -Allocate resources -Manage, forecast and assess human resources -Produce statistical reports relating to candidate profiles -Appraisals -Auditing, financial and accounting purposes -Business management, planning and restructuring | Legitimate interests (to properly administer our staff) | <ul style="list-style-type: none"> -Other members of the Keyrus group -Service providers and advisors |
| Benefits information (salary details, bonus payments pension details, medical insurance, share scheme details, company car scheme details) | Generated by Keyrus or third parties providing the relevant service | <ul style="list-style-type: none"> -Maintain staff records -Allocate resources -Providing you with benefits -Manage, forecast, assess and make business decisions in relation to financial and other obligations to staff and third parties (such as tax authorities and beneficiaries) in relation to any benefits owed to employees -Auditing, financial and accounting purposes -Business management, planning and restructuring | <p>Performance of a contract</p> <p>Compliance with legal obligation (if applicable)</p> | <ul style="list-style-type: none"> -Other members of the Keyrus group -Service providers and advisors |

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|---|--|---|---|---|
| Financial details (bank account numbers, credit card details, national insurance number, tax status) | Provided directly by staff | <ul style="list-style-type: none"> -Pay salaries, expenses, make relevant deductions and other benefits to staff -Payroll processes and administration -Auditing, financial and accounting purposes | Performance of a contract | <ul style="list-style-type: none"> -Other members of the Keyrus group -Service providers and advisors |
| Details of partners, dependents, beneficiaries | Provided directly by staff | <ul style="list-style-type: none"> -Processing benefits to which employees' partners, dependents or other beneficiaries may be entitled | Legitimate interests (of our staff to ensure their partners, dependents or other beneficiaries are provided what they are entitled)) | <ul style="list-style-type: none"> -Service providers and advisors |
| Emergency contacts (next of kin, doctors) | Provided directly by employees | <ul style="list-style-type: none"> -Contact the designated contacts in the case of an emergency | Legitimate interests (of our staff to ensure their emergency contacts can be contacted in an emergency) | <ul style="list-style-type: none"> -Other members of the Keyrus group -Service providers and advisors |
| Performance and development records (training records, records of courses and training undertaken, performance reviews and assessments) | Provided directly by staff and generated by Keyrus | <ul style="list-style-type: none"> -Conduct performance appraisals -Assist with career planning, skills monitoring -Assess suitability for and process promotions, job moves and staff restructuring -Fulfil our regulatory and internal policy obligations, including demonstrating compliance with regulatory and professional requirements in relation to compliance, training and examination -Auditing, financial and accounting purposes -Business management, planning and restructuring | <ul style="list-style-type: none"> Legitimate interests (to properly administer our staff) Compliance with legal obligation (if applicable) | <ul style="list-style-type: none"> -Other members of the Keyrus group -Service providers and advisors -Law enforcement, regulators and other parties for legal reasons |

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|--|--|--|--|---|
| Professional development requests (request for training put forward by the staff). | Provided directly by staff and generated by Keyrus | -Arrange and record the training requested and/or carried out by the staff member | Legitimate interests (to properly administer our staff) | -Other members of the Keyrus group -Service providers and advisors |
| Disciplinary, capability and conduct records (details of warnings and other records relating to conduct) | Generated by Keyrus | -Assessing, investigating and taking action in relation to disciplinary, capability, grievance and conduct issues -Maintain staff records -Monitor and improve our human resources procedures and processes -Fulfil our obligations to regulators -Auditing, financial and accounting purposes -Business management, planning and restructuring | Legitimate interests (to properly administer our staff) | -Other members of the Keyrus group -Service providers and advisors -Law enforcement, regulators and other parties for legal reasons |
| Absence and attendance records (records relating to time away from the office. Including holiday, illness and paternity/maternity leave) | Provided directly by staff or generated by Keyrus | -Monitor absence and sickness -Make decisions relating to human -Resource allocation, salary and benefit changes -Address other issues that may arise from absences -Auditing, financial and accounting purposes -Business management, planning and restructuring | Compliance with legal obligation If processing involves special category data, such processing is necessary to carry out the obligations and exercise specific rights of Keyrus or its staff in the field of employment | -Other members of the Keyrus group -Service providers and advisors |

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|--|---|--|--|--|
| Disability and health records (information relating to any disability or health condition that are relevant to an individual's job role) | Provided directly by staff | <ul style="list-style-type: none"> -Address legal obligations to staff -To address legal obligations to staff in relation to health and safety in the workplace. -Assist staff in the performance of their job role -Determine whether a staff member is fit to undertake tasks required by their job role | <p>Compliance with legal obligation</p> <p>If processing involves special category data, such processing is necessary to carry out the obligations and exercise specific rights of Keyrus, or its staff, in the field of employment. Or it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.</p> | <ul style="list-style-type: none"> -Other members of the Keyrus group -Service providers and advisors |
| Equal opportunities information (e.g. information relating to race, ethnicity, religion, philosophical beliefs and sexual orientation) | Provided directly by staff | -Equal opportunities monitoring, including promotion of gender equality, and data analytics research | Where it is needed in the public interest, such as for reviewing the existence or absence of equal opportunities or treatment between groups of people with a view to maintaining and promoting such equality, or promoting racial and/or ethnic diversity at the senior level | <ul style="list-style-type: none"> -Other members of the Keyrus group -Service providers and advisors -Other members of the Keyrus group -Service providers and advisors |
| Health and safety records (information relating to health and safety in the workplace, accidents and near misses) | Provided directly by staff or generated by Keyrus | -To address legal obligations to staff in relation to health and safety in the workplace. | If processing involves special category data, such processing is necessary to carry out the obligations and exercise specific rights of Keyrus or its staff in the field of employment | <ul style="list-style-type: none"> -Other members of the Keyrus group -Law enforcement, regulators and other parties for legal reasons |

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|---|---|---|---|--|
| Information about criminal convictions and/or offences | Provided by third parties providing the relevant services | -To carry out background checks as appropriate | <p>If it is appropriate given the nature of the role and where we are legally able to do so. We would do so where:</p> <p>-It is necessary for compliance with a legal obligation to which Keyrus is subject (for example, where we must carry out criminal record checks for certain roles); or</p> <p>-It is necessary for the purposes of Keyrus' legitimate interests (for example to check the suitability of staff where, although there is no legal obligation to carry out a criminal record check, it is clear from the circumstances of the work or role that checking is justified).</p> | <p>-Other members of the Keyrus group</p> <p>-Law enforcement, regulators and other parties for legal reasons</p> |
| Qualifications, employment history and professional work experience (professional qualifications, education history, previous employment, previous projects and achievements) | Provided directly by staff or indirectly by third parties providing the relevant services (e.g. recruitment agencies) | <p>-Assess personal and professional development</p> <p>-Assess suitability for promotions, job moves and staff restructuring</p> <p>-Fulfil our obligations to regulators, including demonstrating the suitability of staff for their role to regulators and professional bodies</p> | Legitimate interests (to properly administer our staff) | <p>-Other members of the Keyrus group</p> <p>-Service providers and advisors</p> <p>-Law enforcement, regulators and other parties for legal reasons</p> |

| Category of personal information | Source | How we use it | Legal basis for processing | Categories of recipient(s) |
|--|---|--|--|---|
| Professional (membership of professional bodies, consultation bodies) | Provided directly by staff | -Perform our legal obligations in relation to professional or trade membership | Compliance with legal obligation (if applicable) | -Service providers and advisors |
| Recruitment information (CVs, references and recruitment assessments including opinions and comments of interviewers and the recruitment team) | Provided directly by staff, generated by Keyrus or provided indirectly by third parties providing the relevant services (e.g. recruitment agencies) | -Assess and maintain a record of suitability or eligibility for a role -Taking up your references -Fulfil our obligations to regulators, including demonstrating the suitability of employees for the role to regulators and professional bodies | Legitimate interests (to recruit appropriate personnel) | -Other members of the Keyrus group -Service providers and advisors -Law enforcement, regulators and other parties for legal reasons |
| References prepared by Keyrus about you | Generated by Keyrus | -Provide references to requesting third parties (e.g. employers) | Legitimate interests (to properly administer our staff (past and present)) | -Third party recipient of reference |
| Any other data provided by staff that is stored on staff equipment and computer systems (electronic communications, information relating to use of the computer systems, documents stored on company hardware) | Provided directly by staff or generated by Keyrus | -Monitor compliance with internal rules and policies -Investigate security breaches and misuse of computer equipment and systems -In accordance with back-up and disaster recovery plans | Legitimate interests (to properly administer our staff) | -Other members of the Keyrus group -Service providers and advisors -Law enforcement, regulators and other parties for legal reasons |

| Category of personal information | Source | How we use it | Legal basis for processing | Categories of recipient(s) |
|--|---|--|---|---|
| Data collected through monitoring of staff communications and use of staff equipment and IT systems | Generated by Keyrus | <ul style="list-style-type: none"> -Monitor compliance with internal rules and policies -Monitor appropriate use of IT, fraud and malicious software prevention, IT security, preventing unauthorised access to our systems; -Investigate security breaches and misuse of computer equipment and systems -Help desk management | Legitimate interests (to properly administer our staff) | <ul style="list-style-type: none"> -Other members of the Keyrus group -Service providers and advisors -Law enforcement, regulators and other parties for legal reasons |
| CCTV images | Generated by Keyrus | <ul style="list-style-type: none"> -To ensure building security only | Legitimate interests (to ensure the security of our premises) | <ul style="list-style-type: none"> -Service providers and advisors -Law enforcement, regulators and other parties for legal reasons |
| For employee shareholders: management of the entry of employees into the employee share scheme (choice of shares or funds), keeping shares in savings plans, organization and management of employee votes for election of directors | Provided directly by employees or generated by Keyrus | <ul style="list-style-type: none"> -To ensure that employees are correctly enrolled in the employee share scheme -To maintain necessary records in relation to employee elections | <ul style="list-style-type: none"> Performance of a contract Compliance with legal obligation (if applicable) | <ul style="list-style-type: none"> -Other members of the Keyrus group -Service providers and advisors |