

HGSL - Employee Privacy Policy

HOWDEN

Owner: Marija Sapkauskaite & Ellie Corbin

Approved by: Andy Searle & Brian Davidson

Date: November 2025

Review Due: November 2026

Version: V8.1

Applicability: Howden Group Services Limited

Contents

Section	Page
Contents	3
01. Overview	4
02. Processing Your Data	4
03. Categories of Data	4
04. Legal Basis	6
05. Processing Special Categories of Personal Data	9
06. Criminal Conviction Data	10
07. Consent	10
08. Data Collection	10
09. Data Retention	11
10. Data Sharing	11
11. Transfer of Personal Information	12
12. Use of Artificial Intelligence	12
13. Your Rights	12
14. Queries	14
15. Version control	15
16. Policy Approval History	15

01. Overview

Howden is committed to protecting the privacy and security of your personal information. This Privacy Policy (“Policy”) explains how we collect, use, store and protect personal information about you during and after your employment with us, in accordance with the Data Protection Act 2018, and the General Data Protection Regulation (GDPR).

This Policy applies to all applicants, current and former employees & contractors of Howden Group Services Limited. We understand the importance of maintaining your trust and confidence, and we are dedicated to handling your data responsibly and transparently.

Please read this Privacy Notice carefully to understand how and why we use your information and what are your rights regarding your data. If you have any questions, concerns, or requests relating to this Notice, please contact the HR team via Workday Help.

02. Processing Your Data

In accordance with applicable Data Protection Laws, your employing entity will be identified as the Controller.

We collect and process your personal data for the purposes as outlined in this Policy. We may change or update this Policy from time to time. Should we materially change our approach to data protection, you will be informed of these changes or made aware that we have updated the Policy.

03. Categories of Data

During your recruitment, employment, and post-employment with us, we control and process the following categories of data, including, but not limited to:

Categories of Data	Employment Category
Employee related data: Name, address, Date of Birth (DOB), contact information, gender, HMRC PAYE details, National Insurance details, National Insurance number, bank details, marital status, driver’s license, details of any disabilities which require workplace adjustments, photos, hobbies, interests and diversity data including but not limited to ethnicity, race, religious beliefs and sexual orientation.	<ul style="list-style-type: none">• Applicants• Employees• Contingent Workers• Former Employees
Emergency contact details: Name, relationship to the employee, contact details	<ul style="list-style-type: none">• Applicants• Employees• Contingent Workers• Former Employees
Recruitment and selection: Job history, education - qualification certificates, agency name, referral details, proof of unemployment, interview notes, tests,	<ul style="list-style-type: none">• Applicants• Employees• Contingent Workers• Former Employees

<p>pre-employment screening, conflict of interest: information on directorships, interest in other companies, candidate survey feedback and reporting.</p>	
<p>Right to work information:</p> <p>Valid passport and visa, National Identity Card or long birth certificate and proof of National Insurance number, proof of address, UK immigration details, nationality.</p>	<ul style="list-style-type: none"> • Applicants • Employees • Contingent Workers • Former Employees
<p>Employee Lifecycle information/changes:</p> <p>Salary, job details, fit and proper assessment and certificates, notice period, responsibilities, working hours, location, length of service, working time records, County Court Judgements/Certificate of Earnings, roles in Workday.</p>	<ul style="list-style-type: none"> • Applicants • Employees • Contingent Workers • Former Employees
<p>Reward and Benefit data:</p> <p>Salary, pension, bonus, allowances, shareholding, loans and ad-hoc advances, benefit selections, dependent and beneficiary details including their name, address, DOB and gender, medical information, length of service details.</p>	<ul style="list-style-type: none"> • Applicants • Employees • Contingent Workers • Former Employees
<p>Family Leave of Absence information:</p> <ul style="list-style-type: none"> • Maternity: Expected week of confinement, doctor's name and address, MatB1 Certificate, risk assessments, child's DOB, holiday entitlement, working patterns, leave eligibility, dates, and reasons. • Paternity: Expected week of confinement, child's DOB. • Adoption: Matching Certificate/Official Notification, notice of intention to take leave, confirmation of leave and annual leave usage/allowances. • Shared parental (adoption and birth): Notice of entitlement and intention to take leave, curtailment notice, Matching Certificate/Official Notification (adoption), Birth Certificate (birth). 	<ul style="list-style-type: none"> • Applicants • Employees • Contingent Workers • Former Employees
<p>Sickness/Holiday:</p> <ul style="list-style-type: none"> • Sickness: Doctor's name (or other Medical Practitioner) and address, details of condition, return to work conversation(s), time off dates and reasons, GP/Medical Practitioner report request & response, occupational health referral & response. • Holiday: booking and entitlement. 	<ul style="list-style-type: none"> • Applicants • Employees • Contingent Workers • Former Employees
<p>Career:</p> <ul style="list-style-type: none"> • Career development plans, Continuing Personal Development (CPD) data, goals and objectives, development plans, performance, performance rating, talent descriptor, professional institute membership number, professional qualifications, professional qualification sponsorship application(s), Learning Agreement (s). 	<ul style="list-style-type: none"> • Applicants • Employees • Contingent Workers • Former Employees

<p>Employee relations data:</p> <ul style="list-style-type: none"> • Details of data generated with reference to employee relations policies and processes (which may include but is not limited to Disciplinary Policy, Grievance Policy, Capability Policy/Bullying and Harassment Policy/Whistleblowing Policy or any employment matters where it has been indicated to the employee that a record of the issues will be made). This will include documents such as meetings invitation letters, confirmation of outcome letters, meeting notes/summary notes, personal data referred to during the meeting e.g. Workday records. • Performance improvement emails relating to employee's performance, invitation letters, Performance Improvement Plans (PIP), confirmation of outcome of PIP, confirmation of outcome letters as per Capability Policy and procedure. • Consultation meeting invites, consultation meeting notes, letter confirming redundancy, settlement agreement and correspondence with legal representatives (if applicable), calculation sheets for redundancy payments, completion of statutory forms e.g. HR1. • Flexible working application(s), flexible working outcome letter, employee file notes. • TUPE details of any claims or actions brought against the Transferor by the employee within the previous 2 years (e.g. Tribunal claims). • Employee Surveys, feedback, and reporting. 	<ul style="list-style-type: none"> • Applicants • Employees • Contingent Workers • Former Employees
<p>Leaver information:</p> <p>Resignation letter, resignation acceptance, settlement/redundancy agreement, employee leaver survey, exit Interview Notes, death certificate, reason for leaving, approved reference and regulatory references.</p>	<ul style="list-style-type: none"> • Applicants • Employees • Contingent Workers • Former Employees
<p>Expense claim information:</p> <p>Expense claims past and present</p>	<ul style="list-style-type: none"> • Applicants • Employees • Contingent Workers • Former Employees
<p>Social Mobility Data:</p> <p>Types of school attend, eligibility for free school meals, and highest level of qualifications obtained</p>	<ul style="list-style-type: none"> • Applicants • Employees • Contingent Workers • Former Employees

04. Legal Basis

We process your personal data to facilitate essential business activities which are based on several lawful grounds, as set out in the table below. In summary, these include:

- For the performance of our contract with you
- For compliance with a legal obligation to which we are subject
- To initiate/defend legal claims
- To protect the vital interests of individuals
- For our Legitimate Interests (or those of a third party)

Where we refer to activities that are necessary for our “Legitimate Interest”, we consider that our “Legitimate Interest,” is to ensure fair and effective recruitment of suitable personnel and the effective reward, administration, support,

development, and management of staff. This is important to ensure that we continue to meet our business objectives and goals, both in the short and long term; maintain our reputation; and continue to attract and retain high calibre staff. Any additional legitimate interests are listed below:

Activities (Purposes)	This processing is necessary:
Recruitment and selection of all employees including pre-employment screening.	<ul style="list-style-type: none"> • To take steps at the applicant's request to enter a contract of employment. • For the purpose of our legitimate interests
On-boarding employees onto Workday and other systems and entering into contracts	<ul style="list-style-type: none"> • To take steps at the applicant's request to enter a contract of employment. • For compliance with regulatory obligations to which we are subject. • For the purpose of our legitimate interests
Right to Work checks	<ul style="list-style-type: none"> • To take steps at the applicant's request to enter a contract of employment. • For compliance with legal obligations to which we are subject.
Providing and administering employee remuneration, benefits, incentive schemes and share schemes	<ul style="list-style-type: none"> • For the performance of our contract with you • For the purpose of our legitimate interests
To support HR administration, maintaining and processing general records necessary to manage the employment of the worker (including making Employment Lifecycle changes)	<ul style="list-style-type: none"> • For the performance of our contract with you • For compliance with legal obligations to which we are subject. • For the purpose of our legitimate interests
Allocating and managing duties and responsibilities for employees	<ul style="list-style-type: none"> • For the performance of our contract with you • For compliance with legal obligations to which we are subject. • For the purpose of our legitimate interests
To provide access, technical support, and maintenance for Workday and other information systems	<ul style="list-style-type: none"> • For the performance of our contract with you • For the purpose of our legitimate interests
Managing and operating performance, employee relations cases, employee surveys/feedback and reporting, management information (including diversity monitoring) and other informal and formal HR processes and making related management decisions	<ul style="list-style-type: none"> • For the performance of our contract with you • For compliance with legal obligations to which we are subject. • For the purpose of our legitimate interests
Managing the training and development, promotion, career of employees and succession planning for the business	<ul style="list-style-type: none"> • For the performance of our contract with you • For the purpose of our legitimate interests
Processing information about absence or medical information to support employees to get access to benefits, to return to work or providing additional support as applicable	<ul style="list-style-type: none"> • For compliance with legal obligations to which we are subject. • For the purpose of our legitimate interests

Complying with reference requests where the Company is named by the individual as a referee	<ul style="list-style-type: none"> For the purpose of our legitimate interests
Complying with reference requests for KYC Directors requests.	<ul style="list-style-type: none"> For compliance with legal obligations to which we are subject. For the purpose of our legitimate interests
Disaster Recovery and business continuity	<ul style="list-style-type: none"> For the performance of our contract with you For the purpose of our legitimate interests
Management of Company premises, facilities, and Health & Safety.	<ul style="list-style-type: none"> For the performance of our contract with you For compliance with legal obligations to which we are subject. For the purpose of our legitimate interests
Complying with employment laws and regulation to which the Company is subject in the conduct of its business	<ul style="list-style-type: none"> For compliance with legal obligations to which we are subject. For the purpose of our legitimate interests
To enforce our legal rights and obligations, and for any purposes in connection with any legal claims made by, against or otherwise involving you	<ul style="list-style-type: none"> For the performance of our contract with you For compliance with legal obligations to which we are subject. For the purpose of our legitimate interests
To comply with lawful requests by public authorities	<ul style="list-style-type: none"> For the performance of our contract with you For compliance with legal obligations to which we are subject. We consider that we have a legitimate interest in ensuring that we comply with all legal requirements placed on us, whether those are EU obligations or non-EU obligations. We wish to maintain our reputation as a good cooperate citizen and to act appropriately in all the countries we operate in.
Providing and administering employee expenses to compensate employees appropriately	<ul style="list-style-type: none"> For the performance of our contract with you For compliance with legal obligations to which we are subject. For the purpose of our legitimate interests
Risk and audit management activity (internal and external) to assess and report on risks/results.	<ul style="list-style-type: none"> For compliance with legal obligations to which we are subject. For the purpose of our legitimate interests pursued
Financial planning and analysis	<ul style="list-style-type: none"> For compliance with legal obligations to which we are subject. For the purpose of our legitimate interests
Media subscription services	<ul style="list-style-type: none"> For the purpose of our legitimate interests
IT services, management, and administration	<ul style="list-style-type: none"> For the performance of our contract with you For compliance with legal obligations to which we are subject. For the purpose of our legitimate interests
Investigations into allegations of fraud & misconduct, breaches of contract, internal policies/procedures, breaches of external regulations or other civil/criminal offences.	<ul style="list-style-type: none"> For compliance with legal obligations to which we are subject. For the purpose of our legitimate interests

Additional information regarding specific data processing activities may also be notified to you locally or outlined in applicable policies. We may also use personal data obtained through the use of corporate communications systems (such as system logs, email/Teams, CCTV and building access logs) as part of legitimate investigations.

05. Processing Special Categories of Personal Data

On occasion, we may process more sensitive personal data as part of the activities described above. This type of data is referred to as "**Special Categories**" of personal data and may include information related to your health and, to the extent that you provide it to us, information relating to your race, ethnicity, political opinions, religious or philosophical beliefs, sexual orientation, and trade union membership.

Where we process these categories of data, it is necessary we process them under one or more of the following additional legal bases:

- Your consent;
- for the purposes of carrying out the obligations and exercising your rights or our rights in relation to employment law, social security and social protection law, to the extent permissible under applicable laws;
- In compliance with other applicable laws to which we are subject,
- to protect your vital interests or of another person where you are physically or legally incapable of giving consent (for example in exceptional emergency situations, such as a medical emergency); or
- for the establishment, exercise, or defence of legal claims.
- for reasons of substantial public interest, on the basis of law.

This will include the following activities and purposes, although this is not an exhaustive list. We will process special categories of personal data:

- In order to assess and review eligibility to work in the UK;
- To carry out the collection of statistical data subject to local laws, or where required to record such characteristics to comply with equality and diversity requirements of applicable local legislation or, to keep our commitment to equal opportunity under review;
- For compliance with employment, health and safety or social security laws. For example, to provide statutory incapacity or maternity benefits, avoid breaching legal duties to you, to ensure fair and lawful management of your employment, avoid unlawful termination of your employment, to administer our private medical and long-term disability schemes, to make reasonable accommodations or adjustments and avoid unlawful discrimination or dealing with complaints arising in this regard;
- To administer your trade union membership and ensure that any relevant rights that you may have in connection with any Trade Union membership are complied with, as required to enable us to meet our obligations under employment law; and
- To manage and investigate any complaint under our Grievance Policy (or other relevant policies), where such characteristics or information are relevant to the particular complaint, in order to comply with employment law obligations.

06. Criminal Conviction Data

Where applicable laws permit, we may need to collect and process data relating to criminal convictions. This will only be undertaken where we have an applicable legal reason, and this reason may be your consent. The processing of such data will only be for specific purposes as set out under applicable laws. An example would be for pre-employment screening purposes or for the ongoing 'fit for work' assessments of those staff who hold controlled/regulated functions.

07. Consent

We may ask for your consent for certain processing that isn't otherwise covered under the bases mentioned above. If consent is needed, we'll ask separately to make sure it's freely given, informed and clear. When we do, we will provide details about the processing at the time, along with the impact of not providing consent.

Please note, we will endeavor to ensure that when we reply on your consent to process your personal data that this is not a condition or requirement of your employment.

08. Data Collection

We may collect your personal data from various sources, including:

- You;
- Your family members, employer, or representative;
- Your manager;
- Pre-employment screening providers;
- Benefit providers;
- Professional Qualification Bodies;
- Government agencies (including HMRC) and Courts;
- Previous employers; and
- Regulators (depending upon the type of role).

We do not collect more information than we need to fulfil our purposes.

Where we ask you to provide personal data to us on a mandatory basis, we will inform you of this at the time of collection and in the event that particular information is required by the contract or statute this will be indicated. Failure to provide any mandatory information will mean that we cannot carry out certain HR processes. For example, if you do not provide us with your bank details, we will not be able to pay you. In some cases, it may mean that we are unable to continue with your employment or engagement as we will not have the personal data we believe to be necessary for the effective administration and management of our relationship with you.

Apart from personal data relating to you, you may also provide us with personal data of third parties, notably your dependents and other family members, for purposes of HR administration and management, including the administration of benefits and to contact your next of kin in an emergency. Before you provide such third-party personal data to us, you must first inform these third parties of any data which you intend to provide to us and of the processing to be carried out by us, as detailed in this Privacy Policy.

09. Data Retention

We endeavor to ensure that personal data is kept as current as possible, and that irrelevant or excessive data is deleted or made anonymous as soon as reasonably practicable.

We retain records containing personal data for the life of your employment and the following 7 years unless there is a legal or regulatory obligation to do otherwise. This means that some personal data may be retained for varying time periods in order to comply with legal and regulatory obligations and for other legitimate business reasons. Further information on data retention can be found in the HGH UK Retention, Archiving and Disposal (RAD) Policy.

10. Data Sharing

Your personal data may be accessed or disclosed internally on a need-to-know basis by:

- local, regional and global Human Resources, including managers and team members;
- local, regional, and executive management responsible for managing or making decisions in connection with your relationship with Howden or when involved in a HR process concerning your relationship with Howden (including, without limitation, staff from Business Risk/Compliance, Legal, Human Resources and Information Security);
- system administrators; and
- where necessary for the performance of specific tasks or system maintenance by staff in teams such as the Finance and IT Department and the Global HR information systems support team.

Certain basic personal data, such as your name, location, job title, contact information, employee number, photo and any published skills and experience profile is also accessible to other employees.

Your personal data is also accessed by third parties, and their associated companies and subcontractors, who provide us with services, such as administration support, payroll services and the hosting, supporting and maintenance of our HR information systems.

Examples of third parties with whom your data will be shared include:

- Recruitment & Selection providers;
- Company professional advisers including, without limitation, solicitors, accountants, insurers, auditors, or others advising the Company in any professional capacity;
- Pre-employment Screening providers;
- Benefit providers;
- Employee Survey providers;
- Tax support providers;
- Global Mobility providers;

- Payroll, Benefit and HR Administration providers (including European/Global HR/Payroll/Benefit providers as applicable); and
- Government and Regulatory agencies.

We also share data externally in some circumstances where you ask us to do so e.g. Employee requested references.

We expect any third party we share your data with to process any data disclosed to them in accordance with applicable laws, including with respect to data confidentiality and security. Where these third parties act as a Processor (for example a payroll provider) they carry out their tasks on our behalf and upon our instructions for the above-mentioned purposes. In this case, your personal data will only be disclosed to these parties to the extent necessary to provide the required services.

In addition, we may share personal data with national authorities in order to comply with a legal obligation to which we are subject. For example, in the case of imminent or pending legal proceedings or a statutory audit.

11. Transfer of Personal Information

From time to time your personal data (including special categories of personal data) will be transferred to associated companies of Howden to process for the purposes described in this Privacy Policy.

These associated companies may be located within the UK, the European Union and elsewhere in the world. Personal data may also be transferred to third parties, e.g. service providers or regulators as set out above, who may have systems or suppliers located outside the UK or the European Union. As a result, your Personal Information may be transferred to countries outside of the country you work in whose data protection laws may be less stringent than yours.

Where this occurs, we'll make sure that appropriate safeguards are in place to protect your personal information and that any transfers comply with applicable data protection laws. Where required, we've ensured that service providers (including other Howden companies) sign standard contractual clauses as approved by the UK Information Commissioner, or relevant supervisory authority. If you would like a copy of any standard contractual clauses in place relating to the transfer of your personal information, you can contact HR via Workday Help.

12. Use of Artificial Intelligence

In certain cases, the tools, systems, or platforms we use may leverage Artificial Intelligence (AI) and related technologies. For example, in order to reduce the time that it takes for us to manually review CV's or to conduct parts of our interviewing or screening processes. We may use AI services to record the minutes of meetings or interviews and then analyse the transcript of that meeting to produce a summary that is then subject to a human review for accuracy. We may also use Large Language Models that rely on our internal indexing of documents to make it easier for us to search for and retrieve information that we hold.

Where we use AI technology to process personal data, we will ensure it is in accordance with applicable laws and regulations.

13. Your Rights

- **Right to access, correct and delete your Personal Information** – We aim to ensure that all Personal Information is correct. You also have a responsibility to ensure that changes in Personal Information are notified to us so that we can ensure that your data is up-to-date. You can see and update most of this data yourself via Workday.
 - Subject to certain exemptions, you have the right to request access to any of your Personal Information

that we may hold, and to request correction of any inaccurate data relating to you.

- **Data portability** – If we are processing your personal information based on a contract you're a part of and the data is processed automatically, you have the right to receive all the personal information which you have provided to us in a structured, commonly used, and machine-readable format. You can also ask us to transfer it to another controller if it's technically possible.
- **Right to restriction of processing** - You have the right to restrict our processing of your Personal Information where:
 - you contest the accuracy of the Personal Information;
 - where the processing is unlawful, but you do not want us to erase the data;
 - where we no longer need the Personal Information for the purposes of the processing, but you require them for the establishment, exercise, or defence of legal claims; or
 - where you have objected to processing justified on legitimate interest grounds (see below) pending verification as to whether Howden has compelling legitimate grounds to continue processing.

Where Personal Information is subject to restriction in this way, we will only process it with your consent or for the establishment, exercise, or defence of legal claims.

- **Right to object to processing justified on legitimate interest grounds** - Where we are relying upon legitimate interest in processing data, then you have the right to object to that processing. If you object, we must stop that processing unless we can either demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms or where we need to process the data for the establishment, exercise, or defence of legal claims.
- **Right to withdraw consent** - Where we have relied on your consent to process particular information and you have provided us with your consent to process data, you have the right to withdraw such consent at any time. In some cases, deleting the relevant data from Workday (although in this case it may remain in back-ups and linked systems until it is deleted in accordance with our data retention policy) may be sufficient to end this processing activity.
- **Rights in respect to automated decision making** – Where we have used fully automated processing to make a decision about you that has a legal impact, subject to certain exemption, you have the right to have this decision reviewed by a human.
- **Right to complain to the Supervisory Authority** - Where you have complained to us in relation to a data protection related matter, and are not satisfied with the outcome, or if you think that we have breached the Regulations, you have the right to refer your complaint to the Supervisory Authority. You can find the relevant contact details in the table below.

England	Scotland	Wales	Northern Ireland
Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF	Information Commissioner's Office 45 Melville Street Edinburgh EH3 7HL	Information Commissioner's Office 2nd floor Churchill House Churchill way Cardiff CF10 2HH	Information Commissioner's Office 3rd Floor 14 Cromac Place Belfast BT7 2JB
Tel: 0303 123 1113	Tel: 0131 244 9001	Tel:029 2067 8400	Tel: 0303 123 1114
Email: casework@ico.org.uk	Email: scotland@ico.org.uk	Email: wales@ico.org.uk	Email: ni@ico.org.uk

14. Queries

We try to meet the highest standards when collecting and using your personal information. If you have a query, want to exercise any of your rights or want to make a complaint about the way we have collected or used your personal information, please contact HR via Workday Help or the Group Data Protection Officer at DPO@howdengrp.com.

15. Version control

Version number	Author	Date
V1	AM	April 2018
V2	AM	August 2018
V3	AM	February 2019
V4	AM	September 2019
V5	AS	November 2020
V6	AS	April 2021
V7	AS	September 2021
V8	AS	February 2022
V8.1	AS	October 2022
V8.2	Andy Searle	November 2024
V8.3	Andy Searle	November 2025

16. Policy Approval History

Version number	Approver	Date
V8.2	Andy Searle and Emily Marshall	November 2024
V8.3	Andy Searle & Brian Davidson	November 2025

The logo for Howden, featuring the word "HOWDEN" in a bold, blue, sans-serif font. The letters are closely spaced and have a slight shadow effect. The logo is positioned on the left side of the page, partially overlapping a large, light blue circular graphic element.