

Privacy Notice for employees, workers, and consultants

Introduction

This Privacy Notice sets out what personal data we hold about you and how we collect and use it, both whilst you are working for us, and after you have left. It applies to current and former employees, workers, contractors, agency workers, consultants, interns, volunteers, partners and directors together referred to as 'you'.

We are required by data protection legislation to give you the information in this Privacy Notice. It is important that you read it carefully, together with any other information that we might give you from time to time about how we collect and use your personal data. You should also read our Data Protection Policy which explains our obligations in relation to personal data and how we keep it secure, as well as what we expect from you when you are handling personal data in the course of your work.

This Privacy Notice does not form part of your contract of employment or other contract to provide service and does not give you any contractual rights. We may update this Privacy Notice at any time.

Who is the controller?

The corporate entities listed below are Data Controllers. This means that where you have a working relationship with any one of them it is responsible for deciding how they hold and use personal data about you. The registered addresses of each Company are as follows:

- **Autocraft Drivetrain Solutions** – Syston Lane, Belton, Grantham, Lincolnshire NG32 2LY.
- **Autocraft Machining Solutions** – Booth Drive, Park Farm South Industrial Estate, Wellingborough, Northamptonshire, NN8 6GR.
- **Vertex Engineering Solutions** - Units 24 & 16 Boulton Industrial Estate, Hockley, Birmingham, B18 5AU.
- **EV Solutions BV** – Westervoortsedijk 73, 6827 AV, Arnhem, Netherlands.

The Group Human Resources Director is the Data Protection Lead for the purposes of data protection legislation and is your main point of contact.

What type of personal data do we hold about you?

We collect and use various types of personal data about you to manage our working relationship with you, which may include, where relevant to your working relationship with us, for example: biographical details; recruitment information; details of the terms of your employment or engagement with us; pay and benefits details; working hours; performance information; details of your holidays and other leave; disciplinary, conduct and grievance matters; employee representation; health and safety; CCTV footage as appropriate, business equipment, technology and systems usage information, etc.

We may also collect and use more sensitive personal data about you, such as:

- Information about your health, including any medical condition, sickness absence and health and sickness records.
- Information relating to accidents or incidents in the workplace.
- Information about your race or ethnicity, religious beliefs, sexual orientation
- Information about criminal convictions and offences

Why do we hold your personal data and on what legal grounds?

We hold and use your ordinary personal data for employment, HR and business administration purposes. This will include, for example, where relevant to your working relationship with us: management of our employment or consultancy relationship with you; administration of pay and benefits; monitoring and assessment of performance;

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provision and regulation of holidays and other leave; addressing conduct, disciplinary and grievance issues; performance of day-to-day business activities, etc.

Data protection legislation specifies the legal grounds on which we can hold and use your personal data. Most commonly when we process your personal data, it is based on one or more of the following legal grounds:

- **Performance of the contract** - Where we need it to perform, operate, and administer the contract we have with you (this could be an employment contract, a contract for services, or another type of contract). This may include ensuring that we pay you correctly, provide your contractual benefits, and fulfil our contractual obligations.
- **Legal Obligation** - Where we need it to comply with a legal obligation. Typically, this may include legal obligations such as to provide any statutory entitlements (for example minimum wage, holidays, statutory family leave and pay), to comply with limits on working time, to meet health and safety requirements, or not to discriminate or dismiss employees unfairly.
- **Legitimate Interest** - Where it is necessary for our legitimate business interests (or those of a third party), and your interests and fundamental rights do not override those interests. This may include for example, managing working hours to ensure effective business operations, and monitoring your use of computers or other technology.

We may hold and use more sensitive data about you, where relevant to your working relationship with us, for purposes including, managing absence and ensuring cover, making reasonable adjustments to accommodate health conditions, facilitating the taking of family related leave, making salary and statutory payments, monitoring equality and diversity, ensuring the security of our assets, and controlling access to our premises. Most commonly, as well as one of the legal grounds listed above, we rely on one or more of the following additional legal grounds when we process this type of data:

- **Legal obligation/right in relation to employment** - Where we need to exercise our legal rights or carry out our legal obligations in relation to employment or social security and the processing is in line with our Data Protection Policy.
- **Public interest in monitoring equal opportunities within the workforce** - Where it is needed in the public interest, such as for equal opportunities monitoring, or in relation to our occupational pension scheme, and in line with our Data Protection Policy.
- **Assessment of working capacity** - Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.

Occasionally, we may also hold and use your personal data in the public interest for the detection or prevention of crime, or where needed to protect your vital interests or those of another person/s. We may also occasionally hold and use your personal data to establish, exercise, or defend a legal claim, or where needed to protect your interests (or someone else’s interests) where you are not capable of giving your consent, or where you have already made the information public.

Sometimes we may use your personal data for purposes that are different from, or incompatible with those for which we collected it. If we do this, we will notify you and explain our legal grounds for using your data in this way as required under data protection legislation.

How do we collect your personal data?

You provide us with most of the personal data about you that we hold and use. Other personal data about you that we hold, and use is generated by you in the carrying out of your duties. For example, during email correspondence

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or when producing documents, or when you are using certain equipment such as computers, door entry systems and clocking-in and out systems.

Some of the personal data we hold and use about you is provided by or generated from internal sources in the course of running our business. For example, colleagues may refer to you in emails or documents, your manager will assess you as part of the appraisal process, and information about you may be generated as part of our business and operational planning.

Some of the personal data about you that we hold and use may come from external sources. For example, when we are running recruitment processes, we may have collected references from previous employers; we may obtain information about you from publicly available sources such as your LinkedIn profile, or other media sources. We may ask for a report from an occupational health professional if you have long-term sickness absence; customers may give feedback about you; we might seek advice from a professional adviser that includes information about you.

If you give us someone else's personal data.

Sometimes, you might provide us with another person's personal data – for example, details of your emergency contact or next of kin. In such cases, we require you to inform the individual what personal data of theirs you are giving to us. You must also give them our contact details and let them know that they should contact us if they have any queries about how we will use their personal data.

Who do we share your personal data with?

Your personal data may be shared internally, and with other corporate entities within the Group, including with members of the HR and recruitment team (including payroll), your line manager, managers in the business area in which you work and IT staff if access to the data is necessary for performance of their roles.

We will only share your personal data with third parties where we have appropriate legal grounds under data protection legislation which permits us to do so. Commonly, this could include situations where we are legally obliged to provide the information; to comply with our contractual duties, or where it is necessary in our legitimate interests. For example, to HMRC for tax purposes, to providers of your contractual benefits such as occupational pension, health insurance, etc., to an IT service provider for maintenance of our IT systems.

As a general rule, we will not transfer your personal data to countries outside the European Economic Area. There are adequacy regulations in respect countries within the EEA, which means that there is an adequate level of protection for your personal data in these countries.

In the event that you work for Autocraft Solutions Group in another country, your personal data may be transferred to countries outside the European Economic Area (EEA) for performance of the contract, compliance with our legal obligations in our day-to-day operations and legitimate business interests. In these cases, personal data is transferred outside the EEA on the basis of identified safeguards being in place.

Consequences of not providing personal data.

We only ask you to provide personal data when we have a good reason, and there may therefore be consequences if you do not provide particular information to us.

Some of the personal data you provide to us is required by law. For example, if you do not provide your national insurance number, we will not be able to make correct tax/NI deductions on PAYE, and, if you are pregnant, we require a MATB1 in order to pay statutory maternity pay.

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We may require you to provide other personal data where it is necessary for us or our pensions/benefits providers to fulfil our contractual obligations to you, or for you to fulfil your contractual obligations to us, or where our use of the data is necessary in our legitimate interests.

If you choose not to provide us with the personal data requested, we will tell you about the implications of any such decision at the relevant time.

How do we protect your personal data?

We take the security of your personal data seriously. We have put in place appropriate technical and organisational measures to prevent your personal data from being accidentally lost, destroyed, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who need to access it in the proper performance of their roles for us. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality. These measures are in accordance with applicable laws and regulations.

Where we engage third parties to process personal data on our behalf, they are also obliged to implement appropriate technical and organisational measures to ensure the security of data.

How long will we keep your personal data?

We will not keep your personal data for longer than we need it for our legitimate purposes.

We take into account the following criteria when determining the appropriate retention period for your personal data:

- the amount, nature, and sensitivity of the personal data.
- the risk of harm from unauthorised use or disclosure.
- the purposes for which we process your personal data and how long we need the particular data to achieve these purposes.
- how long the personal data is likely to remain accurate and up to date.
- for how long the personal data might be relevant to possible future legal claims.
- any applicable legal, accounting, reporting or regulatory requirements that specify how long certain records must be retained.

Given the variety of your personal data that we use and the varying circumstances in which we use it, it is difficult to specify ahead of time precisely how long we will keep personal data. However, we will not keep personal data longer than is necessary for the purpose of collecting the data or and/or for longer than legislation provides. We will always keep your personal data for so long as we are required to do so under legal, accounting, reporting or regulatory requirements.

In some cases, it may be more appropriate to decide retention periods on a case-by-case basis depending on the specific circumstances.

Your rights.

You have a number of legal rights relating to your personal data, which are outlined here:

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- **the right to make a subject access request.** This enables you to receive certain information about how we use your personal data, as well as to receive a copy of it and to check that we are lawfully processing it.
- **the right to request that we correct incomplete or inaccurate** personal data that we hold about you.
- **the right to request that we delete or remove** personal data that we hold about you where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- **the right to object to our processing** your personal data where we are relying on our legitimate interest (or those of a third party), where we cannot show a compelling reason to continue the processing.
- **the right to request we restrict our processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **the right to request that we transfer** your personal data you have provided to us to you or to another party, in certain limited circumstances.

If you would like to exercise any of the above rights, please contact the Group HR Manager (Data Protection Lead) in writing. Please note that these rights are not absolute, and in some circumstances, we may be entitled to refuse some or your entire request.

If you have any questions or concerns about how your personal data is being used by us, you can contact the Group Human Resources Director (Data Protection Lead).

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues. Details of how to contact the ICO can be found on their website: <https://ico.org.uk>

DOCUMENT HISTORY

Rev	Section	Revision Detail	Author	Approver	Issue Date
1	All	New issue	M.Percival	S.Harris	24.05.2018
2	All	Rebranding to Autocraft Solutions Group	L.Paukina	M.Percival	26.06.2018
3	All	Major Update	T Pugh	B Barr	22 August 2024