

LabTech
Employee Privacy Policy

Overview

This is LabTech's group-wide Employee Privacy Policy that applies to each of the LabTech group companies which acts as an employer, namely Labtech London Limited, Runtech Group Limited, LABS Worldwide Limited, LABS Living Limited, The Camden Market Management Company Limited, Castlehaven Row Limited, and Camden F&B Limited (each referred to as '**LabTech**, '**our**', '**us**' or '**we**').

This privacy policy describes:

- what personal information we collect about our EU-based employees, potential employees and other staff;
- how we use and otherwise process that information;
- the basis upon which we process it;
- with whom it is shared; and
- how it is stored.

This policy also describes other important topics relating to this information and its privacy, including the rights which you have in relation to our processing of your personal information.

Please read this privacy policy carefully to understand how we handle your personal information.

Who does this policy apply to?

This privacy policy applies to all employees and prospective employees, interns and prospective interns (referred to throughout as an "**employee**") of Labtech London Limited, Runtech Group Limited, LABS Worldwide Limited, LABS Living Limited, The Camden Market Management Company Limited, Castlehaven Row Limited, and Camden F&B Limited (in each case, the entity which employs you being the data controller for the purposes of this Employee Privacy Policy).

1. Information collection

1.1 We may collect and use a range of different types of information about you, and we refer to this as "**personal information**" throughout this policy. Below is some information about the categories of personal information that we collect about you, but you can find more detailed information about the types of information we collect about you in [Annex 1 \(Types of personal information we collect about you\)](#) below.

(a) Your personal and contact details

This includes your name, date of birth, home address, nationality, passport number and contact details.

(b) Your family/next of kin details

In case of emergency, we collect contact information for your next of kin (such as your spouse or civil partner). In some cases, we also collect information relating to your dependents or any co-insured family members.

(c) Documentation we collect

This includes a copy of your passport, citizenship information, your national insurance number, and any relevant work permits or visa details.

(d) Employment information

We collect and use information relating to your employment with us, including details regarding your current/former titles and positions held with us, your current and historic compensation with LabTech and details of any absences you have (sickness details, occupational health reports, authorised and unauthorised absences). This also includes details of your performance review, the hours you work and any trade union memberships you hold.

(e) **Payroll data**

In order to pay you, we need to collect information such as your bank account details and national insurance number.

(f) **Talent management / job application / CV information**

When you apply for a job with us, or work for us, we need to collect and hold details regarding your application and CV, which will include previous employment background, professional qualifications, references, career development and skills analysis, training, departmental changes, performance and calibration details.

(g) **Diversity information**

If you give us your consent, we will collect information about your ethnic background in order to help us monitor and improve our performance in relation to diversity and equal opportunities.

(h) **CCTV footage**

For security purposes, we collect CCTV footage in our premises, which will involve the collection of your image.

1.2 Source of personal information. We may receive some of this personal information from third parties, such as recruitment agencies, training providers, occupational health providers, your former employer and public agencies.

1.3 Special categories of data: Some of the personal information that we collect about you or which you provide to us about you, your family and benefit beneficiaries may be special categories of data. Special categories of data include information about your physical and mental health, sexual orientation, racial or ethnic origin, political opinions, philosophical belief, trade union membership, sexual orientation and biometric data.

2. **Use of information**

Use of your personal information

2.1 We may collect, use and store your personal information for the following reasons:

- (a) to operate, support and centralise human resources administration and management (including but not limited to recruitment, payroll administration, employee administration, learning management, performance management and review, data storage, expense reporting and benefits management and termination of your employment);
- (b) to enable you to do your job;
- (c) candidate profiling and suitability assessment;
- (d) health and safety records and management;
- (e) occupational health;
- (f) security vetting, criminal records checks, credit checks and clearances (where applicable and allowed by law);
- (g) confirming information on resumes, CVs and covering letters, providing reference letters and performance reference checks;
- (h) staff management and promotions;
- (i) equal opportunities monitoring;
- (j) provision of staff information to customers, agencies and suppliers in the course of the provision of services by a LabTech group entity;
- (k) taxation and registrations for employees working outside the country where they are based;
- (l) security of company facilities;
- (m) ensuring adequate insurance coverage for our business;

- (n) compliance with any procedures, laws and regulations which apply to us;
- (o) establishing, exercising or defending our legal rights; and
- (p) otherwise, for the lawful operation of our business.

Use your family and next of kin information

- 2.2 Separately, we may process personal information about your family and next of kin for the purposes of provision of benefits and so that we may contact them in an emergency. If you disclose information about your family in written, electronic or phone communications, we may also have access to this information on our systems.

Other uses

- 2.3 We will only process your or your family/next of kin's personal information for the specific purposes listed above or for any other purposes specifically permitted by law. If we wish to process your personal information for any other purpose, we will update this privacy policy in accordance with section 10.

3. Legal bases for use of your personal information

- 3.1 We need to have legal bases for using your personal information for the purposes set out in this privacy policy. We consider that our legal bases are as follows:

- (a) our use of your personal information is necessary for the performance of our obligations under our contract with you (for example, to pay you or to confer a benefit under the terms of an employment contract or as part of our concessions offering); or
- (b) our use of your personal information is necessary for complying with our legal obligations, particularly as your employer or prospective employer (for example, providing your personal information to HMRC); or
- (c) where neither (a) nor (b) apply, it is necessary for the purposes of our legitimate interests or the legitimate interests of a third party (including, for example, to ensure a safe working environment, to ensure the reliability of our employees or to maintain adequate personnel records).

- 3.2 Where we rely on our (or a third party's) legitimate interests for using your personal information, we will undertake a *balancing test* to ensure that our (or the third party's) legitimate interests are not outweighed by your interests or fundamental rights and freedoms which require protection of the personal information. You can ask us for information on this balancing test by using the contact details at section 11.

- 3.3 Where we collect and process more sensitive categories of personal information (for example, information for health assessment information, or relating to your membership of a trade union or for equal opportunities monitoring), we will only process such information:

- (a) where we reasonably need to do so in order to comply with our legal obligations as an employer or to exercise specific rights that we have as an employer;
- (b) where we need to do so in order to assess your working capacity, or to treat an injury;
- (c) where we need to do so to protect your or another person's vital interests (and we are unable to obtain your consent); or
- (d) where you have given us your consent.

- 3.4 If we have asked for your consent to collect and use certain types of personal information, you may withdraw your consent at any time, by contacting your HR representative.

4. Disclosure of personal information

Disclosure to LabTech group companies

- 4.1 Your business contact information will be made available to other LabTech employees, temporary staff and contractors, and with customers, agencies and suppliers in the course of

providing our services. This information includes your name, position, workplace telephone numbers, work addresses and email addresses, employee department, employee job title and miscellaneous position details.

- 4.2 Your personal information may be shared with any company that is a member of our group where we consider that it is in our legitimate interests to do so for internal administrative purposes, corporate strategy, auditing and monitoring and research and development.
- 4.3 We may also share your personal information with our group companies where they provide products and services to us, such as information technology systems and human resources services.
- 4.4 Access to your personal information is limited to those employees who need to know the personal information, and may include your managers and their designees, as well as employees in the human resources, corporate services, legal, information technology, and finance departments.

Disclosure to third parties

- 4.5 We will share your personal information with the following categories of third parties:
 - (a) other parties such as legal and regulatory authorities, accountants, auditors, lawyers and other outside professional advisors; and
 - (b) companies that provide products and services to us, such as:
 - (i) payroll and benefits providers;
 - (ii) pension providers;
 - (iii) insurance companies, including those providing medical insurance and group income protection;
 - (iv) human resources services, such as pre-employment checks and for employee monitoring;
 - (v) recruitment agencies;
 - (vi) parties requesting an employment reference;
 - (vii) public agencies, including border agencies;
 - (viii) training providers;
 - (ix) trade unions;
 - (x) occupational health assessment providers and medical professionals undertaking drug and alcohol testing;
 - (xi) information technology systems suppliers and support, including email archiving, telecommunication suppliers, back-up and disaster recovery and cyber security services; psychometric testing providers and other outsourcing providers, such as off-site storage providers and cloud services providers.
- 4.6 We will also disclose your personal information to third parties:
 - (a) where it is in our legitimate interests to do so to run, grow and develop our business, such as:
 - (i) if we sell or buy any business or assets, we may disclose your personal information to the prospective seller or buyer of such business or assets;
 - (ii) if a LabTech entity is acquired or substantially all of its assets are acquired by a third party, in which case personal information held by the entity will be one of the transferred assets;
 - (b) if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, any lawful request from government or law enforcement officials and as may be required to meet national security or law enforcement requirements or prevent illegal activity;

- (c) to enforce our contract with you, to respond to any claims, to protect our rights or the rights of a third party, to protect the safety of any person or to prevent any illegal activity; or
 - (d) to protect the rights, property or safety of LabTech, our employees, customers, suppliers or other persons.
- 4.7 Some of these companies (including our group companies) may use your data in countries which are outside of the EU. Please see section 7 below for more detail on this aspect.

Restrictions on use of personal information by recipients

- 4.8 Any third parties with whom we share your personal information are limited (by law and by contract) in their ability to use your personal information for the specific purposes identified by us. We will always ensure that any third parties with whom we share your personal information are subject to privacy and security obligations consistent with this privacy policy and applicable laws.
- 4.9 Save as set out above, we will never share, sell or rent any of your personal information to any third party without notifying you and/or obtaining your consent. Where you have given your consent for us to use your information in a particular way, but later change your mind, you should contact us and we will stop doing so.

5. Retention of personal information

- 5.1 LabTech collects and maintains personal information on current, former and prospective employees, interns and prospective interns for legitimate corporate business purposes, such as processing payroll, collecting CVs/resumes to fill vacant positions and maintaining accurate benefits records, health and safety records and other compliance records required by law.
- 5.2 We aim to keep your personal information for no longer than necessary for the purposes for which the personal information is used or otherwise processed. For example, we keep CV and job application information of six months. In general, the length of time we plan to retain personal information depends on the purposes for which we collect and use it and / or as required to comply with applicable laws. For example, in the UK, payroll and wage records must be kept for six years.
- 5.3 In practice, we may retain hard-copy paper files in archive storage for a longer period, so that we have a record of your employment with us. Access to these hard-copy files and archive storage is restricted, and they are securely stored to ensure that they are protected from unauthorised access. Whenever a hard-copy file is retrieved from archive, as a first step the information stored in it is checked against the relevant retention periods, and any information that we no longer need to retain is securely destroyed.
- 5.4 Further information on the length of time during which we retain your personal information can be found in the LabTech group Data Retention and Records Management Policy.

6. Your rights

- 6.1 You have certain rights in relation to your personal information. If you would like further information in relation to these or would like to exercise any one of them, please contact your HR representative. You have the right to request that we:
- (a) provide access to any personal information which we hold about you;
 - (b) update any of your personal information which is out of date or incorrect;
 - (c) delete any personal information which we hold about you;
 - (d) restrict the way that we process your personal information;
 - (e) provide your personal information to a third party provider of services;
 - (f) provide you with a copy of any personal information which we hold about you; or
 - (g) consider any valid objections which you have to our use of your personal information.

- 6.2 We will consider all such requests and provide our response within a reasonable period (and in any event any time period required by law). Please note, however, that certain personal information may be exempt from such requests in certain circumstances.
- 6.3 If either an exception applies, or a particular right does not apply in the way which you request, then we will tell you this when responding to your request. We may request you provide us with information necessary to confirm your identity before responding to any request you make.
- 6.4 If you have any questions or concerns about our use of your personal information, please contact your HR representative.

7. **Transfers of information**

- 7.1 The personal information may be processed by other members of our group or by third party data processors based outside the EEA for the purposes mentioned in section 2 above. Further details on to whom your personal information may be disclosed are set out in section 4 above.
- 7.2 If we provide any personal information about you to any such non-EEA members of our group (including Guernsey) or any third party data processors based outside the EEA (including in Ukraine and Israel), we will take appropriate measures to ensure that the recipient protects your personal information adequately in accordance with this Privacy Policy. These measures include in the case of transfers to third party data processors in other jurisdictions outside of the EEA, entering into European Commission approved standard contractual arrangements with them.
- 7.3 Further details on the steps we take to protect your personal information in these cases are available from us on request by contacting your HR representative at any time.

8. **Security**

- 8.1 LabTech is committed to protecting personal information from loss, misuse, disclosure, alteration, unavailability, unauthorised access and destruction and takes all reasonable precautions to safeguard the confidentiality of personal information, including through use of appropriate organisational and technical measures. Organisational measures include physical access controls to our premises, use of security systems and maintaining access logs. Technical measures include use of access controls for access to our system, regular penetration testing and use of secure methods for transferring data.
- 8.2 In the course of provision of your personal data to us, your personal information may be transferred over the internet. Although we make every effort to protect the personal information which you provide to us, any transmission of information between you and us over the internet is not completely secure. As such, you acknowledge and accept that we cannot guarantee the security of your personal information transmitted to us over the internet and that any such transmission is at your own risk. Once we have received your personal information, we will use strict procedures and security features to prevent unauthorised access to it.
- 8.3 Where we have given you (or where you have chosen) a password which enables you to access our systems or any portal or account, you are responsible for keeping this password confidential. We require that you do not share your password with anyone.

9. **Third party websites**

You may, from time to time, during your employment or internship, access links to or other websites operated by third parties (e.g. training providers, industry news sources and bulletins). Please note that this privacy policy only applies to the personal information that we (or third parties on behalf of our group companies) collect from or about you and we cannot be responsible for personal information collected and stored by third parties. Third party websites have their own terms and conditions and privacy policies, and you should read these carefully before you submit any personal information to these websites. We do not endorse or otherwise accept any responsibility or liability for the content of such third party websites or third party terms and conditions or privacy notices or policies.

10. **Changes to our privacy policy**

This privacy policy does not form part of any employee's contract of employment or contract with an intern and we may amend it from time to time. Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by email.

11. **Further questions or making a complaint**

11.1 If you have any queries or complaints about our collection, use or storage of your personal information, or if you wish to exercise any of your rights in relation to your personal information, please contact the HR department in the first instance at hr@labsgroup.com. We will investigate and attempt to resolve any such complaint or dispute regarding the use or disclosure of your personal information.

11.2 You may also make a complaint to the Information Commissioner's Office. Alternatively, you may seek a remedy through local courts if you believe your rights have been breached.

The practices described in this privacy policy statement are current personal information protection practices as at 18 December 2018.

Annex 1

Types of Personal Information we collect

The table below sets out, in detail, the types of personal information that we collect about you.

Personal details	<ul style="list-style-type: none">(a) your full name (including first name, maiden name and surname);(b) birth date;(c) home address;(d) national insurance number/social security number;(e) nationality;(f) home telephone number;(g) gender;(h) driver's licence and insurance details;(i) passport information;(j) physical and/or mental health information;(k) details of education and qualifications; and(l) work experience information.
Family / next of kin details	<ul style="list-style-type: none">(a) emergency contact information;(b) spouse or civil partner name;(c) spouse or civil partner contact information;(d) spouse's or civil partner's national insurance number;(e) names of dependents and children; and(f) co-insured family members details and beneficiaries of your life insurance or other benefits.
Documentation	<ul style="list-style-type: none">(a) copy of passport;(b) citizenship details;(c) national identification number;(d) other documents required to show your right to live in your current country and to work for your employer there; and(e) details required for residency, work permit and/or visa processes.
Employment information	<ul style="list-style-type: none">(a) current/former titles and positions held with us (and information about that position, including how long in position, supervisor, location of position, employee identification number, promotions, training records, overall work

	<p>history, languages spoken, disciplinary actions, grievances, retirement eligibility, transfers);</p> <ul style="list-style-type: none"> (b) identification search results, including employment searches, directorship searches, bankruptcy searches and media searches; (c) current and historic compensation with LabTech (base salary, bonus, pension contributions, benefits); (d) details of absences (sickness details, occupational health reports, authorised and unauthorised absences); (e) work contact information (phone number, postal address, mailing address, email address); (f) performance reviews and information (including career forecasts and development plans); (g) work hours (overtime and shift work, hours worked and department standard hours); (h) previous employment references; (i) trade union membership details; (j) medical and occupational health reports; (k) travel bookings and other expense claims, records and information; and (l) termination information (leaver information, termination/exit payments, pension entitlements, references supplied, exit questionnaires).
<p>Payroll data</p>	<ul style="list-style-type: none"> (a) bank details; (b) working time records; (c) current compensation; tax information; and (d) IDs related to payroll processing.
<p>Talent management / job application / CV information</p>	<p>Details contained in an application and resume/CV or otherwise provided to us, including previous employment background, professional qualifications, references, interview notes, career development and skills analysis, training, departmental changes, performance and calibration details.</p>
<p>Medical information</p>	<p>Medical details, including medical certificates produced by our external occupational health providers, details of any prescription drugs you take, and details of any accidents, or relevant health and safety incidents, which you are involved with that take place on board our vessels.</p>
<p>Diversity information</p>	<p>Information about your ethnic background.</p>

CCTV data

We collect CCTV footage in our premises, which will involve the collection of your image.