

Privacy notice for employees, workers and contractors (EU)

What is the purpose of this document?

Neovia is committed to protecting the privacy and security of your Personal Data.

This privacy notice describes how we will collect and use Personal Data about you during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR).

It applies to all employees, workers and contractors.

Who is responsible for your Personal Data?

The Neovia entity which contracts with you will be a "Data Controller" of your Personal Data. This means that we are responsible for deciding how we hold and use Personal Data about you. In addition, where processing of Personal Data will be undertaken by an entity controlled by, or under common control with your contracting entity, these Neovia affiliates may also be data controllers of your Personal Data.

What Personal Data do we process?

Personal Data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We can collect, store, and use the following categories of Personal Data about you:

- *Personal contact details such as name, title, addresses, telephone numbers, and email addresses*
- *Date of birth*
- *Gender*
- *Marital status and dependents*
- *Next of kin and emergency contact information*
- *National ID number, passport number and/or similar identification numbers*
- *Bank account details, payroll records and tax status information*
- *Salary, annual leave, pension and benefits information*
- *Start date and, if different, the date of your continuous employment*
- *Leaving date and your reason for leaving*
- *Location of employment or workplace*
- *Copy of driving license, ID card, passport, certifications*
- *Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process)*
- *Employment records (including job titles, work history, working hours, holidays, training records and professional memberships)*
- *Compensation history*
- *Performance information*
- *Disciplinary and grievance information*
- *System administration details such as IP addresses, passwords and usernames*
- *Photos and film*

How is your Personal Data collected?

We will collect Personal Data about employees and contractors through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider.

We will collect additional Personal Data in the course of job-related activities throughout the period of you working for us.

Neovia Compliance Statement

We will comply with data protection law. This means that the Personal Data we hold about you must be:

- 1. Used lawfully, fairly and in a transparent way.*
- 2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.*
- 3. Relevant to the purposes we have told you about and limited only to those purposes.*
- 4. Accurate and kept up to date.*
- 5. Kept only as long as necessary for the purposes we have told you about.*
- 6. Kept securely*

How we will use information about you?

We will only use your Personal Data when the law allows us to. Most commonly, we will use your Personal Data in the following circumstances:

- 1. Where we need to perform the contract we have entered into with you*
- 2. Where we need to comply with a legal obligation*
- 3. Where it is necessary for legitimate interests pursued by us or a third party and your interests and fundamental rights do not override those interests.*

We may also use your Personal Data in the following situations, which are likely to be rare:

- 1. Where we need to protect your interests (or someone else's interests)*
- 2. Where it is needed in the public interest or for official purposes*

In which situations will we use your Personal Data?

We will need all the categories of information in the list above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases we may use your Personal Data to pursue legitimate interests, provided your interests and fundamental rights do not override those interests. The situations in which we will process your Personal Data are listed below

- *Making a decision about your recruitment or appointment*
- *Determining the terms on which you work for us*
- *Checking you are legally entitled to work in your country of employment*
- *Paying you and, if you are an employee, deducting tax and National Insurance contributions*

- *Providing the benefits as determined under your agreement with us*
- *Inviting you to participate in benefit plans*
- *Granting awards under any plans*
- *Administering your participation in any plans, including communicating with you about your participation and collecting any tax or contribution*
- *Enrolling you in a pension arrangement in accordance with our enrolment duties*
- *Liaising with your pension provider and any other provider of employee benefits.*
- *Administering the contract we have entered into with you*
- *Business management and planning, including accounting and auditing*
- *Conducting performance reviews, managing performance and determining performance requirements*
- *Making decisions about salary reviews and compensation*
- *Assessing qualifications for a particular job or task, including decisions about promotions*
- *Gathering evidence for possible grievance or disciplinary action*
- *Making decisions about your continued employment or engagement*
- *Making arrangements for the termination of our working relationship*
- *Education, training and development requirements*
- *Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work*
- *Ascertaining your fitness to work*
- *Managing sickness absence*
- *Complying with health and safety obligations*
- *Preventing fraud*
- *Ensuring compliance with our IT policies.*
- *Ensuring network and information security, including preventing unauthorized access to our computer and electronic communications systems and preventing malicious software distribution*
- *Conducting data analytics studies to review and better understand employee retention and attrition rates*
- *Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your Personal Data*

If you fail to provide Personal Data.

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

Change of purpose

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Do we share data?

We may have to share your data with third parties, including third-party service providers (such as payroll service providers or insurance companies) and other entities in the group.

Due to the size and complexity of our operations it is not possible to name each of our data recipients in this notice. However we only share your Personal Data with third parties that guarantee security of your data and treat it in accordance with the law.

We will of course not sell your Personal Data, nor use it for commercial purposes.

We may transfer your Personal Data outside the EU. If we do, we will ensure that appropriate safeguards are in place to protect your Personal Data were these are required by applicable data protection laws and that transfer of your Personal Data is in compliance with such laws.

Why would we share Personal Data with third parties?

We may share your Personal Data with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

How secure is my information with third-party service providers and other entities in our group?

All our third-party service providers and other entities in the group will be required to take appropriate security measures to protect your Personal Data in line with our policies. We will not allow our third-party service providers to use your Personal Data for their own purposes. We will only permit them to process your Personal Data for specified purposes and in accordance with our instructions.

How do we protect your Personal Data?

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Third parties will only process your Personal Data on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

How long will we use your Personal Data?

We will only retain your Personal Data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

What rights do you have in connection with your Personal Data?

Under certain circumstances, by law you have the right to:

- **Request information** and access to your Personal Data
Request correction of the Personal Data that we hold about you
- Request **erasure** of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it
- **Object** to processing of your Personal Data
- **Request** the restriction of processing of your Personal Data
- Right to **withdraw consent**
- Request the **transfer** of your Personal Data to another party
- Right to lodge a **complaint**

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What obligations do you have?

It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during your working relationship with us.

Do we need a Data Protection Officer in our company?

Although Neovia is not required as per the GDPR to appoint a Data Protection Officer (DPO), we have chosen to do so to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your Personal Data, please contact the DPO at: DPO@neovialogistics.com

Changes?

As we have undertaken and will continue to undertake this rigorous compliance exercise, changes are to be expected as we further proceed with our compliance process.

We reserve the right to update this privacy notice at any time and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your Personal Data.