

## Woollard and Henry UK Privacy Policy

### 1. General

This policy is issued by the Woollard and Henry and applies to job applicants, employees (workers, contractors, volunteers, interns, apprentices) and former employees (“you”) of companies within the Woollard and Henry (“the Company”).

In its role as potential employer or employer (whether the employment contract has commenced or not and has ended), the Company is required to process certain personal data of its employees in order to be able to fulfil its legal and contractual obligations and in order to establish a safe and efficient administration. Personal data may also be processed for other purposes as described in this policy.

This policy describes what kind of personal data is processed, the purposes for which it is processed, how the personal data about You will be used and shared during Your employment and after it ends.

The Company is the data controller of your personal data processed in relation to you within the framework of this policy. All personal data is processed in accordance with the, at the time, applicable data protection legislation and in accordance with this policy. If you have any questions about how the Company collects, processes and stores your personal data, please contact your local HR department.

2. Definition of personal data, and processing of personal data and special category of data The term "personal data" is used to describe any information that may be used to identify, directly or indirectly, a specific individual. Examples of personal data are a person’s first and last name, phone number, personal identity number, fingerprint and details of employment as well as a person’s e-mail address and IP address, as long as the information can be used to identify a specific individual.

Processing of personal data is any operation or set of operations which is taken in relation to personal data, whether or not it occurs by automatic means, for example collection, recording, organization, storage, adaptation or alteration, retrieval, gathering or otherwise making information available, alignment or combination and blocking.

3. The personal data processed by the Company in relation to its Employees The Company will only collect personal data necessary to fulfil the purposes of the processing of personal data, as stated below in Section 4. The personal data is processed in accordance with the below defined purposes and good practice on the labor market. Personal data processed by the Company relating to you may include:

- ☐ Your name;
- ☐ Your photograph to arrange a badge for access to the workplace;
- ☐ Your personal identity number, national insurance number and tax number;
- ☐ Your immigration status to check Your right to work in the relevant country;
- ☐ Your address;
- ☐ Your gender;

- ☒ Your bank account details;
- ☒ Your educational background and former employers;
- ☒ Your telephone number;
- ☒ Your performance and career development as well as summaries of performance reviews;
- ☒ Your personal data related to how the Company's IT-systems are used.

Also information relating to members of Your family or household may be collected from You (name, address and telephone numbers) and processed for the purpose of making it possible for the Company to make contact with such persons in case of emergency or for example in relation to an ex-pat assignment where such information may be required to obtain visa. You as an employee shall inform the members of your household that the Company may process their personal data for this purpose.

Only information and personal data that is deemed necessary for the management of the employment relationship and to fulfil the purposes set out in this policy will be processed by the Company.

#### 4. Purposes for which the personal data is processed

The Company processes personal data in order to be able to fulfil its legal and contractual obligations as an employer and in order to establish a safe and efficient administration of its business. More specifically, your personal data may be processed for the following purposes:

- ☒ to enable the Company to be able to fulfil all its obligations in relation to Your employment relationship and employment agreement. This includes processing of personal data to make salary payments, review remuneration, handle sick leave and other types of absences such as maternity and paternity leave, handling vacation entitlements, administering other types of benefits for example pension, health care insurance, life insurance and other types of health services and in order to administer rehabilitations measures;
- ☒ to administer and fulfil its obligations under mandatory law such as handling social security contributions, withholding tax, pension, sick pay, rehabilitation measures and to provide correct information to relevant authorities such as the applicable social insurance agency and the tax agency;
- ☒ to publish contact details and competences on the Company's intranet and webpage;

to ensure correct authorization and access to facilities and IT-systems and to monitor and ensure compliance of internal policies and rules communicated to all employees regarding allowed use of the Company's IT system;

to investigate and act upon any suspected breach against the Company policies or applicable laws and regulations;

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to enable a whistleblowing system being set up in accordance with the applicable data protection legislation and other applicable laws and regulations;

to administer and maintaining personal records and creating a competence database that includes work experience, education, participation in trainings and relevant competences;

to facilitate Your development and for carrying out and follow up on performance reviews making it possible for the Company to plan, organize and manage the employment and to ensure the quality of work being conducted by You;

to ensure that the Company adheres to applicable co-determination rules, including obligations towards the trade unions and other types of mandatory legal employment obligations; and

to manage an effective protocol in case of emergency situations and crisis management.

Your photograph may be used as a profile photo on the Hub or Outlook (in the event you add such photograph yourself on Outlook) and the Company has then a legitimate interest to use it on an internal organisation chart that is stored in the intranet and to give access to such chart to its professional advisers who wish to see the Company structure.

In limited circumstances, your consent may be required to collect and process your personal data (e.g. your photograph to be displayed on the Company's website, in which case you have the right to withdraw your consent later on.

Please note that the Company may collect and process special category of data (previously called sensitive personal data) on the following lawful grounds:

health records to assess Your fitness to work, to ensure Your vital interests if You are critically ill, for the purposes of preventive or occupational medicine, to ensure Your health and safety in the workplace and to enable the Company to fulfil its obligations under employment law;

data about Your ethnicity in the public interest (to ensure equal opportunity monitoring);

☐ trade union memberships if any, to enable the Company to comply with its legal obligations under employment law.

The Company may also check and collect criminal records shortly after an offer is made provided that the Company is authorised to do so under local law or that you have consented it to it.

#### 5. How the personal data is handled

The Company will only process personal data for the purposes it was collected.

The Company will make personal data accessible only to the Company authorized employees (see Section 6 for further information regarding authorized employees). The Company has taken appropriate technical and organizational measures for the protection of the personal data to ensure that only authorized persons are given access to the servers where personal data is stored. The Company is using technical security systems such as but not limited to firewalls,

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Encryption technologies, passwords and anti-virus programs to prevent and avoid unauthorized use of personal data.

In accordance with the purposes stated in Section 4, the Company may need to provide personal data to relevant authorities based on mandatory law and in order to fulfil legal obligations in relation to the Company employees.

To enable the Company to comply with obligations under the employment contract, the Company may share personal data about you with the following data processors (this is not a limitative list):

- ☐ payroll service provider;
- ☐ insurers (for private healthcare, life assurance, disability insurance);
- ☐ pension provider.
- ☐ government and tax authorities

Your personal data may also be transferred to and processed by companies which perform services for the Company (data processors) or to customers, authorities or other third parties with which the Company has a contractual obligation in order for example for such companies, customers, authorities or other third parties to be able to perform the services requested by the Company, confirm the Company's compliance with applicable laws and regulations, or to safely receive supplies from the Company. Only personal data that is necessary to fulfil the purposes in Section 4 will be provided to such parties. The data processors are obliged to act in accordance with data processing agreements signed with them, including, taking appropriate

technical and organizational measures for the protection of the personal data and only process personal data for the purposes it was collected.

Due to the fact that the Company is a part of a group of companies with business activities in several different countries, personal data may be transferred to companies in the Atlas Copco group outside your own country and even to countries outside the EU/EEA that may not ensure as strict data protection legislation as in the EU/EEA. Such a transfer of personal data will always be done in accordance with applicable laws and regulations and the Company will ensure that appropriate technical and organizational measures are implemented.

#### 6. Access to information

Access to personal data will only be granted to individuals in relation to their professional needs. The authorized employees who have authority to access personal data shall limit their use of personal data to what is required for them to fulfil their working tasks and any purpose for which personal data was collected as set out in Section 4.

You as an employee are entitled, upon motivated written request by either e-mail or regular mail to the relevant local HR responsible, to obtain information on what personal data that is being processed and the purpose of such processing. You as an employee are also entitled to request any erroneous, misleading or incomplete personal data to be corrected. Please contact your HR manager.

#### 7. How long we Keep your Personal Data

The Company will keep your personal information during and after your employment for no longer than is necessary for the purposes for which your personal data is processed.

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The Company will keep personal data that is required to keep in order to fulfil its legal obligations (. e.g. to keep your health records in the event of a claim for personal injury). The Company may also keep basic information that is needed in order to provide you with information that you may request such as, for example, a certificate of the employee's employment with the Company.

#### 8. Miscellaneous

In order to ensure compliance with the applicable data protection legislation, as amended from time to time, this policy may be amended by the Company at any given time. The Company will inform you of any such changes. Any breach of the policy shall be reported to your local HR or the Group Privacy Officer, as applicable. Any breach of this policy will be taken seriously and may result in disciplinary actions and

other necessary actions. 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.

You should notify the Company of any changes of the personal data relating to yourself in order to facilitate for an accurate and secure processing of personal data.

Issued: May 2018

Revision detail: 9/12/19