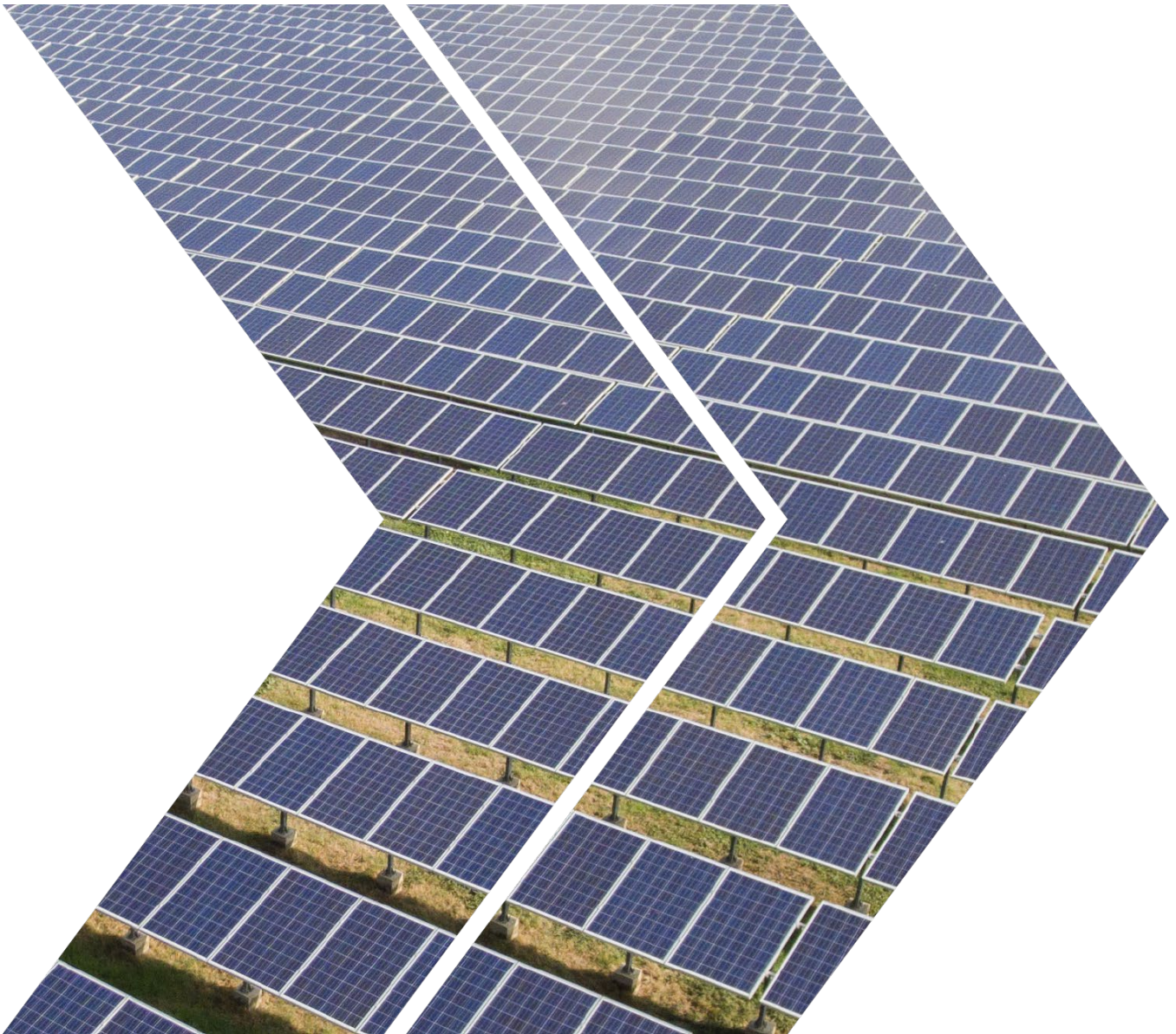


Privacy notice for employees and contractors

June 2020



1. What is the purpose of this document?

This notice describes how BII collect and use your information in accordance with data protection laws

As a data controller BII is responsible for the processing of your personal data and we are required to notify you about such processing.

This notice applies to current and former employees, agency workers and contractors. This notice does not form part of any contract of employment or other contract to provide services.

We may update this notice at any time. The DPO is the sponsor of this privacy notice and is responsible for maintaining this document, including a submission to the Audit & Compliance Committee at least every two years for review and approval.

Please see **Appendix 1** if you are an employee and **Appendix 2** if you are a contractor or agency worker for details of what information we collect, how and why and with whom it may be shared.

2. The kind of information we hold about you

Personal data identifies you as an individual. Some categories require a higher level of protection.

Personal data means any information about an individual who is identified or identifiable from that information. This will include a broad range of information relating to you such as your name and contact details, employee ID, information about your achievements at work, information about your family, day-to-day information such as the content of your emails, CCTV images, and other information.

There are also “special categories” of more sensitive personal data which require a higher level of protection, such as information about your race or ethnicity, religious beliefs, sexual orientation and political opinions, information about your health, including any medical condition, health and sickness records, genetic information and biometric data e.g. finger print recognition, and information about criminal convictions and offences. Further detail about how we use special categories of sensitive personal data are in Appendix 1 and 2 below.

3. How is your personal data collected?

We collect personal data in the recruitment process, either directly from candidates or a recruiter, an employment agency, background check provider or occupational health practitioner. References are obtained from former employers or colleagues.

We will collect additional personal data in the course of work-related activities throughout the period of you working for us, including, for security purposes, via CCTV. Please see BII’s CCTV Policy for further details on how BII processes your personal data collected via CCTV.

4. How we will use information about you

You will find information about the 'why' and 'how' we process your personal data in the appendices.

We may process your personal data for other purposes as may be required by law or as you may request from time to time.

5. If you fail to provide personal data

We require your cooperation to enable us to be legally compliant. If you fail to provide requested information, 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 agency workers).

6. Data sharing

We may have to share your data with third parties, including third-party service providers, our professional advisers and other affiliates and subsidiaries in the BII group. We may transfer your personal data to such parties outside the UK or the EEA. We require third parties to respect the security of your data and to treat it in accordance with the law.

6.1. Why might you share my personal data with third parties?

We will 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.

6.2. Which third-party service providers process my personal data?

The following activities are carried out by third-party service providers: payroll, pension administration, travel, benefits provision, administration and IT services.

6.3. How secure is my personal data with third-party service providers and other entities in the BII Group?

All our third-party service providers and other affiliates and subsidiaries in the BII group are required to take appropriate security measures to protect your personal data in line with our policies. Save where required by law or for statistical purposes, we generally do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

6.4. When might you share my personal data with other entities in the group?

We will share your personal data with other affiliates and subsidiaries in the BII group as part of our regular reporting activities on company performance, recruitment, career planning and succession purposes, business reorganisation, group restructuring, system maintenance support and hosting of data.

6.5. What about other third parties?

We may share your personal data with other third parties, for example in the context of auditing or restructuring of the business. We may also need to share your personal data with a regulator or to comply with the law.

6.6. Transferring information outside the UK or EEA?

In order to perform our contract with you, sometimes we will transfer your personal data to third-party service providers outside of the UK or the European Economic Area (EEA).

When we transfer your personal data outside the UK or the EEA, such transfer will generally be based on the Standard Contractual Clauses (according to EU Commission Decision 87/2010/EC or any future replacement) or another lawful transfer mechanism to ensure that your personal data is subject to a level of data protection which applies within the EEA. For further information about data transfers you may contact us by email to dataprotection@bii.co.uk.

7. Data security

We have measures in place to protect the security of your information in line with the **Information and cyber security policy**. Further details of these measures are available upon request to the DPO.

We have appropriate security measures in place to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know and who are subject to a duty of confidentiality.

We have procedures in place to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

8. Data retention

How long will you use my information for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for. Details of retention periods for different aspects of your personal data are available in our **Record Retention policy**. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity, the potential risk of harm from unauthorised use or disclosure, the purposes for which we process, whether we can achieve those purposes through other means, and legal compliance.

In some circumstances we will anonymise your personal data so that it can no longer be associated with you. In this case we may use such information without further notifying you. Once you are no longer an employee, agency worker or contractor of the company, we will retain and securely destroy your personal data in accordance with our **Record Retention policy**.

9. Right of access, correction, erasure, and restriction

9.1. Your duty to inform us changes

It is important that the personal data we hold about you is accurate and current. We would be grateful if you could keep us informed if your personal data changes during your working relationship with us.

9.2. Your rights in connection with personal data

Under certain circumstances, you lawfully have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request rectification of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

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. 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).

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and you consider it is wrong to process on this ground. You should explain your particular situation and we will consider your objection.

Request the restriction of 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.

Request the transfer of your personal data to another party.

If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact the DPO in writing.

Refuse automated individual decision-making, including profiling, which produces a legal effect or could significantly affect you and so have the right to obtain human intervention on the part of BII, to express your point of view, and to be able to contest the decision.

There may be circumstances in which we are not legally required to comply with your request or an exemption may apply under law.

10. Data protection officer

BII's data protection officer (DPO) oversees 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. 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. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

11. Changes to this privacy notice

We reserve the right to update this privacy notice at any time. A new privacy notice will be provided 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.

If you have any questions about this privacy notice or about our use of your information, please contact the DPO via dataprotection@bii.co.uk.

Appendix 1 – Employee Schedule

Information we collect about employees

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Your name, contact details (i.e. address, home and mobile phone numbers, email address) and emergency contacts (i.e. name, relationship and home and mobile phone numbers)	From you	To enter into/perform the employment contract Legitimate interest: to maintain employment records and good employment practice	To enter into/perform the employment contract
Details of start date salary, annual leave, pension and other benefits information, bank/building society, National Insurance and tax information, your age	From you	To perform the employment contract including payment of salary and benefits Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice	To ensure you receive the correct pay and benefits Information shared with our payroll administrators and with relevant tax authorities
Details of your spouse/partner and any dependants	From you	To perform the employment contract including employment-related benefits, e.g. private medical insurance, life assurance and pension Legitimate interests: in case you have an emergency at work	To ensure you receive the correct pay and benefits Information shared with our payroll administrators and with relevant tax authorities
Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information	From you and, where necessary, the Home Office and/or other applicable government departments or agencies	To enter into/perform the employment contract To comply with our legal obligations Legitimate interest: to maintain employment records	To carry out right to work checks Information may be shared with the Home Office and/or other applicable government departments or agencies

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
<p>Details of your pension arrangements, and all information included in these and necessary to implement and administer them</p>	<p>From you, from our pension administrators and (where necessary) from your own pension fund administrators</p>	<p>To perform the employment contract including employment-related benefits To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice</p>	<p>To administer your pension benefits AND/OR To comply with our auto-enrolment pension obligations Information shared with our pension administrators and with relevant tax authorities</p>

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
<p>Information about your health and information in your sickness and absence records (including sensitive personal data regarding your physical and/or mental health)</p>	<p>From you, from your doctors, from medical and occupational health professionals we engage and from our insurance benefit administrators and providers</p>	<p>To perform the employment contract including employment-related benefits To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice, to ensure safe working practices To protect your vital interest in the case of a medical emergency</p>	<p>To maintain employment records, to administer sick pay entitlement, to follow our policies, assess your capacity to work on health grounds, and to facilitate employment-related health and sickness benefits To comply with our legal obligations to you as your employer Information shared with your doctors, with medical and occupational health professionals we engage and with our insurance benefit administrators and providers</p> <p>We may use information about your disability status, physical or mental health, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments To monitor and manage sickness absence and to administer benefits</p>
<p>Your gender, racial or ethnic origin, sex and sexual orientation, religious or similar beliefs</p>	<p>From you</p>	<p>To comply with our legal obligations and for reasons of substantial public interest (equality of opportunity or treatment)</p>	<p>To comply with our equal opportunities monitoring obligations and to follow our policies</p>

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Criminal records information, including, where applicable, the results of Disclosure and Barring Service (DBS) checks	From you	To perform the employment contract To comply with our legal obligations For reasons of substantial public interest (preventing or detecting unlawful acts, suspicion of terrorist financing or money laundering in the regulated sector and protecting the public against dishonesty)	To carry out statutory checks and screening relating to: pre-employment, fitness and proprietary checks; Where applicable, information shared with DBS and other regulatory authorities as required
Information on grievances raised by or involving you	From you, from other employees and from other advisers we may engage in relation to the grievance procedure	To perform the employment contract To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice	For staff administration, to follow our policies and to deal with grievance matters Information shared with relevant managers, HR personnel and with consultants we may engage
Information on conduct issues involving you	From you, from other employees and from consultants we may engage in relation to the conduct procedure	To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice, to ensure safe working practices	For staff administration and assessments, to follow our policies, to monitor staff performance and conduct and to deal with disciplinary and grievance matters Information shared with relevant managers, HR personnel and with consultants we may engage

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Details of your appraisals and performance reviews and training records	From you, from other employees and from consultants we may engage in relation to the appraisal/performance review process	To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice, to ensure safe working practices	For staff administration and assessments, to follow our policies and comply with legal obligations requiring training, to monitor staff performance and conduct and to deal with disciplinary and grievance matters Information shared with relevant managers, HR personnel and with consultants we may engage
Details of your performance, including of performance management / improvement plans (if any)	From you, from other employees and from consultants we may engage in relation to the performance review process	To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice, to ensure safe working practices	For staff administration and assessments, to follow our policies and to monitor staff performance Information shared with relevant managers, HR personnel and with consultants we may engage
Travel documents and related information including inoculations	From you	To perform the employment contract Legitimate Interest: To facilitate business related travel	For the purposes of business travel on behalf of BII Information shared with foreign embassies and consulates, visa application services, travel management companies, airlines, and computer reservation systems including outside the EEA

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Details of your time and attendance records	From you and systems maintained to control and protect access to BII offices	To perform the employment contract Legitimate interest: to monitor and manage staff access to our systems and facilities and to record staff absences	For payroll and staff administration and assessments, to follow our policies and to monitor staff performance and attendance Information shared with relevant managers, HR personnel and with consultants we may engage and with our payroll administrators
Information in applications you make for other positions within our organisation	From you	To enter into/perform the employment contract To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice	To process the application, information may be shared with relevant managers, HR personnel and consultants with whom we may engage.

<p>Information about your use of our IT, communication and other systems, your access IP address and general location</p>	<p>Automated monitoring of our websites and other technical systems, such as our computer networks and connections, servers, Office365, line of business systems, CCTV and access control systems, communications systems, remote access systems, email and instant messaging systems, intranet and Internet facilities, telephones, voicemail, mobile phones and devices</p>	<p>Legitimate interests: to monitor and manage staff access to our systems and facilities to protect our networks, and personal data of employees and customers/clients, against unauthorised access or data leakage to ensure our business policies, such as those concerning security and internet use, are adhered to for operational reasons, such as maintaining employment records, recording transactions, training and quality control to ensure that commercially sensitive information is kept confidential to check that restrictions on your activities that apply after your employment has ended (post-termination restrictions or restrictive covenants) are being complied with, for investigating complaints and allegations of criminal offences for statistical analysis and capacity planning to prevent unauthorised access and modifications to our systems as part of investigations by regulatory bodies, or in connection with legal proceedings or requests to track individuals travelling in a high risk environment (which is</p>	<p>To protect and carry out our legitimate interests (see adjacent column). Information is shared with relevant managers, HR personnel and third-parties and consultants engaged in assisting us in managing, investigating, monitoring our technology infrastructure systems and data. We may anonymise your information and use it for our statistical and planning needs</p>
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The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
		also to protect your vital interest in the case of a medical emergency)	
Details in references about you that we give to others	From your personnel records, our other employees	To perform the employment contract To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice	To provide you with the relevant reference To comply with legal/regulatory obligations Information shared with relevant managers, HR personnel and the recipient(s) of the reference
Any information about you	From you or other sources	To comply with our legal obligations Legitimate interests to engage in legal proceedings and defend legal claims Where processing is necessary for the establishment, exercise or defence of legal claims	We may process your information where it is needed in relation to investigations or legal claims We may share your information if lawfully requested by the police or ordered by a court

Appendix 2 – Agency Worker/Contractor Schedule

Information we collect about agency workers and contractors

The information we may collect	How we collect the information	Why we collect the information	How we use and may share the information
Your name, contact details (i.e. address, home and mobile phone numbers, email address) and emergency contacts (i.e. name, relationship and home and mobile phone numbers)	From you	To enter into/perform the contract Legitimate interest: to maintain records and good practice	To enter into/perform the contract
Details of contract fees, bank/building society, National Insurance and tax information, your age	From you	To perform the contract including payment of contract fees Legitimate interests: to maintain records and to comply with legal, regulatory and corporate governance obligations and good practice	To ensure you receive the correct fees Information shared with and with relevant tax authorities
Details of your spouse/partner and any dependants	From you	Legitimate interests: in case you have an emergency at work	To contact your emergency contact in case you have an emergency at work
Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information	From you and, where necessary, the Home Office and/or other applicable government departments or agencies	To enter into/perform the contract To comply with our legal obligations Legitimate interest: to maintain records	To carry out right to work checks Information may be shared with the Home Office and/or other applicable government departments or agencies

The information we may collect	How we collect the information	Why we collect the information	How we use and may share the information
Your gender, racial or ethnic origin, sex and sexual orientation, religious or similar beliefs	From you	To comply with our legal obligations and for reasons of substantial public interest (equality of opportunity or treatment)	To comply with our equal opportunities monitoring obligations and to follow our policies
Criminal records information, including, where applicable, the results of Disclosure and Barring Service (DBS) checks	From you	To perform the contract To comply with our legal obligations For reasons of substantial public interest (preventing or detecting unlawful acts, suspicion of terrorist financing or money laundering in the regulated sector and protecting the public against dishonesty)	To carry out statutory checks and screening relating to: pre-employment, fitness and proprietary checks; Where applicable, information shared with DBS and other regulatory authorities as required
Information on grievances raised by or involving you	From you, from other employees and from other advisers we may engage in relation to the grievance procedure	To perform the employment contract To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice	For staff administration, to follow our policies and to deal with grievance matters Information shared with relevant managers, HR personnel and with consultants we may engage

The information we may collect	How we collect the information	Why we collect the information	How we use and may share the information
Information on conduct issues involving you	From you, from other employees and from consultants we may engage in relation to the conduct procedure	To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice, to ensure safe working practices	For staff administration and assessments, to follow our policies, to monitor staff performance and conduct and to deal with disciplinary and grievance matters Information shared with relevant managers, HR personnel and with consultants we may engage
Details of your time and attendance records	From you	To perform the contract Legitimate interest: to monitor and manage and record absences	For payment of contract fees and administration
Details of your training records	From you, from training platforms/providers	To comply with our legal obligations Legitimate interests: to maintain to comply with legal, regulatory and corporate governance obligations, to ensure safe working practices	To follow our policies and comply with legal obligations requiring training,
Information about your health and information in your sickness and absence records (including sensitive personal data regarding your physical and/or mental health)	From you, from doctors	To comply with our legal obligations To protect your vital interest in the case of a medical emergency	To maintain our records, to follow our policies, assess your working capacity on health grounds To comply with our legal obligations to you as your employer

The information we may collect	How we collect the information	Why we collect the information	How we use and may share the information
<p>Information in applications you make for other positions within our organisation</p>	<p>From you</p>	<p>To enter into/perform the employment contract To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice</p>	<p>To process the application Information shared with relevant managers, HR personnel and with consultants we may engage</p>

<p>Information about your use of our IT, communication and other systems, your access IP address and general location</p>	<p>Automated monitoring of our websites and other technical systems, such as our computer networks and connections, servers, Office365, line of business systems, CCTV and access control systems, communications systems, remote access systems, email and instant messaging systems, intranet and Internet facilities, telephones, voicemail, mobile phones and devices</p>	<p>Legitimate interests: to monitor and manage staff access to our systems and facilities to protect our networks, and personal data of employees and customers/clients, against unauthorised access or data leakage to ensure our business policies, such as those concerning security and internet use, are adhered to for operational reasons, such as maintaining employment records, recording transactions, training and quality control to ensure that commercially sensitive information is kept confidential to check that restrictions on your activities that apply after your employment has ended (post-termination restrictions or restrictive covenants) are being complied with, for investigating complaints and allegations of criminal offences</p>	<p>To protect and carry out our legitimate interests (see adjacent column). Information is shared with relevant managers, HR personnel and third-parties and consultants engaged in assisting us in managing, investigating, monitoring our technology infrastructure systems and data.</p>
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The information we may collect	How we collect the information	Why we collect the information	How we use and may share the information
		for statistical analysis and capacity planning to prevent unauthorised access and modifications to our systems as part of investigations by regulatory bodies, or in connection with legal proceedings or requests	
Details in references about you that we give to others	From your records, our other employees	To perform the contract To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice	To provide you with the relevant reference To comply with legal/regulatory obligations Information shared with relevant managers, HR personnel and the recipient(s) of the reference
Any information about you	From you or other sources	To comply with our legal obligations Legitimate interests to engage in legal proceedings and defend legal claims Where processing is necessary for the establishment, exercise or defence of legal claims	We may process your information where it is needed in relation to investigations or legal claims We may share your information if lawfully requested by the police or ordered by a court



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