

# DATA PROTECTION NOTICE FOR EMPLOYEES



## 1. Purpose of this Notice

This notice is intended to explain how your Personal Data will be handled by the Company and sets out the information including the personal information detailed below relating to you ("**Personal Data**") that will be collected and processed by the Company and/or on its behalf by its third party service providers in the context of your job application and, if your application is successful, in the context of your employment.

For the purposes of this notice, the controller of your Personal Data is Pepper Money (PMB) Limited, Harman House, 1 George Street, Uxbridge, UB8 1QQ ("**the Company**", "**we**" or "**us**"). See section 8 of this notice for the contact details of our Data Protection Officer.

## 2. Scope

This notice applies to every employee of the Company (including temporary or fixed term contract employees, ex-employees and secondees) and classes of workers such as consultants, representatives, former applicants, agency, casual workers, contractors, contract workers and those on work placements.

## 3. How and Why We Process Your Personal Data

The following table details the types of Personal Data that we (or Box89 Limited or Peoplecheck Limited (each and together referred to as "**PeopleCheck**") on our behalf) may collect from you and that we shall process as a controller:

Your title, name, contact details, home address, date of birth, next of kin details, dependent details, National Insurance Number, emergency contact name and mobile/home number, passports, visas, photograph, data concerning your health, medical information, medical questionnaire, risk assessments, disability status, (FIT notes) and absence or holiday, gender, nationality, ethnic origin, religious background, marital status, bank details, salary and benefits information including payroll number, insurance policy numbers, tax information and pension details, job title and other information directly related to your position, education, qualification and skills and all records of training, assessments and qualifications, Contract of employment, relevant background checks, recruitment records. Performance management records including probation records, 121 records, appraisals, grievances and disciplinary records, exit interview questionnaires and such other related personal data concerning you.
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The following tables detail how ("**Legal Basis**") and why ("**Purposes**") we process your Personal Data. These tables also describe those recipients (and categories of recipients) with whom we may share your Personal Data ("**Recipients**") and the period for which your Personal Data may be stored ("**Retention**").

**We encourage you to read this section.**

### Necessary for the Entering into and the Performance of your Contract of Employment

Purposes	We obtain, collect and process your Personal Data to: <ul style="list-style-type: none"><li>• process your job/candidate application, including to contact you in relation to interviews and/or offer you a job after the interview stage;</li><li>• process any references you provide to us in the context of recruiting</li></ul>
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	<p>you and relevant back ground checks;</p> <ul style="list-style-type: none"> <li>• pay your salary and/or award you with a bonus/compensation;</li> <li>• administer your pension and other benefits;</li> <li>• administer other requests or procedures requested by you throughout your employment (e.g. annual leave, parental/maternity leave, sick leave);</li> <li>• provide you with adequate training for the purposes of your role as an employee of the Company;</li> <li>• manage your performance and development to report on employee related matters ( e.g. headcount, performance attrition, absence, new hires reporting);</li> <li>• plan for the future of the business, including succession plans and strategic growth</li> </ul>
Legal Basis	It is necessary to process the Personal Data in order to enter into and perform our contract of employment with you.
Recipients	<p>Personal Data may be disclosed for these purposes to entities affiliated with the Company (“<b>Pepper Group Entities</b>”) and our third party service providers. These Recipients may include, but not be limited to:</p> <ul style="list-style-type: none"> <li>• one or more financial institutions;</li> <li>• payroll providers;</li> <li>• employee benefit providers;</li> <li>• IT system and network providers;</li> <li>• our professional and legal advisers, medical advisers, insurance providers, auditors and regulators;</li> <li>• training providers;</li> <li>• background check providers;</li> <li>• recruitment providers and agencies;</li> <li>• facilities providers ( e.g. property management companies);</li> <li>• outsourced business continuity consultants;</li> <li>• employee survey and 360 tool providers</li> </ul>
Retention	We will retain the above information in an employee's personnel file, on a Cloud based system and on a specific network drive for the duration of their employment plus a limited period post-termination in accordance with legislation and our Record Retention Manual which can be accessed by contacting the HR team.
<p><b>IMPORTANT</b> In the event that you do not wish to provide us with your Personal Data for the above Purposes, we will not be able to our obligations under the contract of employment with you.</p>	

## Legitimate Interests

<b>Purpose</b>	We may monitor your internet activity or use CCTV to protect our property and ensure employees work efficiently in a safe environment.
<b>Legal Basis</b>	We have a legitimate business interest to process your Personal Data for the above purposes. Where we process your Personal Data for these

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	purposes, we carefully balance our legitimate business interest with your right to privacy.
<b>Recipients</b>	The Personal Data that we process in the context of Purpose may be disclosed to recipients including but not limited to Company senior managers, service providers (e.g. payroll, benefits), insurance providers, legal, medical and professional advisors, background check providers.
<b>Retention</b>	We will retain personal data in accordance with current legislation and as stated in the Record Retention Manual which can be accessed by contacting the HR team.
<b>IMPORTANT</b>	
Please read your rights regarding our processing of your Personal Data in section 5 of this notice, in particular, please read about your right to object to processing and right to erasure.	

## Compliance with Legal Obligations to which we are subject – Your Personal Data Purpose

<b>Purpose</b>	We obtain, collect and process your Personal Data in order to comply with the legal obligations imposed on us under applicable legislation.
<b>Legal Basis</b>	It is necessary for us to process your Personal Data in order to comply with the legal obligations which apply to us as an employer and a regulated entity.
<b>Recipients</b>	The Personal Data that you provide in your application will be disclosed to recipients including but not limited to Company payroll team, Company human resources team, HMRC, legal advisers, government agencies, medical advisers, insurance providers, employee benefit providers.
<b>Retention</b>	We will retain your personal data for the duration of employment plus a period post-termination in accordance with current legislation and as stated in the Record Retention Manual which can be accessed by contacting the HR team.

## Compliance with other Legal Obligations to which we are subject – Special Categories of Your Personal Data

<b>Purpose</b>	We obtain, collect and process special categories of your Personal Data (e.g. data concerning your health, disability status, ethnic origin and religious background) in order to comply with legal obligations which are imposed upon us under employment law.
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<b>Legal Basis</b>	It is necessary for us to process special categories of your Personal Data in order to comply with employment law.
<b>Recipients</b>	The Personal Data that you provide in your application will be disclosed to recipients including but not limited to the Company payroll team, the Company human resources team, HMRC, legal advisers, government agencies, medical advisers, insurance providers and employee benefit providers.
<b>Retention</b>	We will retain your personal data for the duration of employment plus a period post-termination in accordance with current legislation and as stated in the Record Retention Manual which can be accessed by contacting the HR team.

## 4. Cross-Border Transfers of Your Personal Data

We may transfer your Personal Data outside the European Economic Area ("EEA") to other Pepper Group Entities and other third party recipients. Certain Recipients (our third party service providers and other Pepper Group Entities) who process your Personal Data on our behalf may transfer your Personal Data outside the EEA to a country that does not provide an adequate level of protection to your Personal Data. Where such transfers occur, we ensure that: a) they do not occur without our prior written authority; and b) such transfers of your personal data are subject to the EU Model Clauses, as permitted under applicable data protection. If you would like to find out more about any such transfers, please contact our Data Protection Officer whose details are set out in section 8 of this notice.

## 5. Your Acknowledgment of this Notice and Your Rights

Under applicable data protection laws, you have a number of important rights which are available to you free of charge. We have summarised these below:

<b>Right to Object to Processing</b> <i>NOTE: We encourage you to read this section</i>	In certain circumstances, you have a right to object to our processing of your Personal Data where we process it for our legitimate business interests or because it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority. We may not be able to comply with such a request where there are legitimate grounds for the processing that override your interests, rights and freedoms or where the processing of your Personal Data is required in connection with the defence, establishment or exercise of legal claims.
<b>Right of Access</b>	You may access and obtain a copy of your Personal Data.
<b>Right to Rectification</b>	You may request that we correct any inaccuracies in your Personal Data or amend it if it is incomplete.
<b>Right to Erasure</b>	In certain circumstances, you have the right to request that we erase your Personal Data.  For example, you may exercise this right in the following circumstances:

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	<ul style="list-style-type: none"> <li>• your Personal Data are no longer necessary in relation to the purposes for which they were collected or otherwise processed by us;</li> <li>• where you withdraw consent and no other legal ground permits the processing;</li> <li>• where you object to the processing and there are no overriding legitimate grounds for the processing;</li> <li>• where your Personal Data have been unlawfully processed; or</li> <li>• where your Personal Data must be erased for compliance with a legal obligation.</li> </ul> <p>Where we store your Personal Data for statistical purposes, we may not be able to comply with such a request where it would likely impair such statistical purposes or where we require your Personal Data for compliance with a legal obligation or in connection with legal proceedings</p>
<b>Right to Restriction</b>	<p>You have the right to restrict our processing of your Personal Data where any of the following circumstances apply:</p> <ul style="list-style-type: none"> <li>• where you consider that the Personal Data that we hold about you are not accurate. This restriction will be in place for a period sufficient to enable us to verify the accuracy of your Personal Data;</li> <li>• where the processing is unlawful and you do not want your Personal Data to be erased, so request the use be restricted instead;</li> <li>• where we no longer need to process your Personal Data (e.g. any of the Purposes outlined above have been completed or expire), but we expect it is needed in connection with the defence or establishment of legal proceedings;</li> <li>• where you have objected to our processing of your Personal Data pending the assessment as to whether or not our legitimate business interests undermine your interests, rights and freedoms.</li> </ul> <p>Where you exercise your right to restrict our processing of your Personal Data, we will only continue to process it with your consent or in connection with the defence or establishment of legal proceedings or for the protection of the rights of other people or for reasons of important public interest.</p>
<b>Right to Data Portability</b>	<p>You may receive or arrange for transfer of the Personal Data that you provide to us in a structured, commonly used and machine readable format where we process your Personal Data on the basis of consent or where processing is carried out by automated means. Where you make such a request, we will transfer your Personal Data to a controller of your choice (if it is feasible for us to do so).</p>
<b>Right to Object to Automated Decision-Making,</b>	<p>You have a right not to be subjected to decisions based solely on automated decision-making, including profiling, which produces legal effects concerning you or similarly significantly affects you. We may not be able to comply with such a request where we rely on your explicit</p>

<b>including profiling</b>	consent or where it is necessary to enter and perform our contract with you (as detailed in section 2 above). You may request a person from our team to review the decision so that you can query it and set out your point of view and circumstances to us.
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If you would like to exercise any of your rights detailed above, please contact our Data Protection Officer whose contact details are set out in section 8 of this notice.

## 6. Use of your personal information by Credit Reference Agencies

We may supply your personal information to credit reference agencies (CRAs) and they will give us information about you, such as about your financial history. We may do this to assess creditworthiness, check your identity, trace and recover debts and prevent criminal activity.

We may also continue to exchange information about you with CRAs on an ongoing basis, including any debts not fully repaid on time. CRAs will share your information with other organisations. Your data will also be linked to the data of your spouse, any joint applicants or other financial associates.

The identities of the CRAs, and the ways in which they use and share personal information, are explained in more detail at <https://www.peppergroup.co.uk/siteassets/downloads/CRAIN.pdf>. CRAIN is also accessible from each of the three CRAs – clicking on any of these three links will also take *you* to the same CRAIN document: Callcredit <https://www.callcredit.co.uk/crain>; Equifax <https://www.equifax.co.uk/crain>; Experian <http://www.experian.co.uk/crain/index.html>

## 7. Use of your personal information by Fraud Prevention Agencies

The personal information we have collected from you will be shared with fraud prevention agencies who will use it to prevent fraud and money-laundering and to verify your identity. If fraud is detected, you could be refused certain services, finance, or employment.

Further details of how your information will be used by us and these fraud prevention agencies, and your data protection rights, can be found by contacting our Human Resources team on 03333 701 101 , by email at [people@pepper.money](mailto:people@pepper.money), or in person.

## 8. Concerns Regarding your Personal Data

If you have any concerns about the way your Personal Data is being used or processed by the Company or you are not satisfied, please contact our Data Protection Officer in writing at: Michaela Chiocca, Pepper Money (PMB) Limited, Harman House, 1 George Street, Uxbridge, UB8 1QQ. [DPO@pepper.money](mailto:DPO@pepper.money)

If you are not satisfied by the effort and response by the Company, you have the right to lodge a complaint with the Information Commissioner's Office. Full details on how to do this may be accessed on the ICO website: <https://ico.org.uk/concerns/>.

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## 9. Changes to this Notice

This notice forms part of the Pepper Money (PMB) Limited Employee Handbook. We may amend this Notice from time to time, in whole or part, at our sole discretion, and any changes to this notice will be effective immediately upon publishing the revised Employee Handbook.

If at any time we decide to use your Personal Data in a manner significantly different from that stated in this notice, or otherwise disclosed to you at the time it was collected, we will notify you, and you will have a choice as to whether or not we use your information in the new manner.

If you have questions or concerns about this notice, please contact our Data Protection Officer whose contact details are set out in section 8 of this notice.