

PRIVACY NOTICE FOR TRANSLATE PLUS PERSONNEL

1. What is the purpose of this document?

translate plus is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information 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.

translate plus is a "data controller". This means that we are responsible for deciding how we hold and use personal data about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to current and former employees, 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.

It is important that you read this notice, together with the Groupe Data Protection Policies which can be found here <https://lion.app.box.com/v/DataPrivacyAndSecurityPolicies/folder/18726410438> and with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are aware of how and why we are using such information.

2. Data protection principles

We will comply with applicable data protection laws. This says 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.

3. The kind of information we hold about you

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).

There are "special categories" of more sensitive personal data which require a higher level of protection.

The kind of personal information we hold about you is set out in appendix 1 to this privacy notice.

We may also collect, store, and use the following "special categories" of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, and sexual orientation.
- Information about your health, including any medical condition, health, and sickness records.

How is your personal information collected?

We typically collect personal information about employees, workers, and contactors through the recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers.

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

We may also be required to collect personal data in order to comply with clients that require background checks for personnel working on their accounts. If this is the case, we will obtain your specific consent for the type of personal data that we need to collect and explain the purpose of the collection. How will we use this information:

<i>Term</i>	<i>Ground for processing</i>	<i>Explanation</i>
Contract	Processing necessary for performance of a contract with you or to take steps at your request to enter a contract	These covers carrying out our contractual duties and exercising our contractual rights.
Legal obligation	Processing necessary to comply with our legal obligations	Ensuring we perform our legal and regulatory obligations. For example, providing a safe place of work and avoiding unlawful discrimination.
Legitimate Interests	Processing necessary for our or a third party's legitimate interests	We or a third party have legitimate interests in carrying on, managing, and administering our respective businesses effectively and properly and in connection with those interests processing your data. Your data will not be processed on this basis if our or a third party's interests are overridden by your own interests, rights and freedoms.
Consent	You have given specific consent to processing your data	In general, processing of your data in connection with employment is not conditional on your consent. But there may be occasions where we do specific things such as provide a reference, deduct union dues or obtain medical reports and rely on your consent to our doing so.

Under data protection law, there are various grounds on which we can rely when processing your personal data. In some contexts, more than one ground applies. We have summarised these grounds as Contract, Legal obligation, Legitimate Interests and Consent and outline what those terms mean in the following table.

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

1. Where we need to perform the contract, we have entered into with you. These covers carrying out our contractual duties and exercising our contractual rights.
2. Where we need to comply with a legal obligation. Ensuring we perform our legal and regulatory obligations.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information 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.

Situations in which we will use your personal information

We need personal information as described in Appendix 1 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 information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. We have provided a list of the types of personal information that we collect about you, the reason why we collect this information and the ground for processing this personal data at Appendix 1. Whilst we have tried to provide a thorough list, this list is not exhaustive.

Some of the grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you fail to provide personal information

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 information 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 information 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 information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

4. Sensitive personal information

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations and in line with our data protection policies.
3. Where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme, and in line with our data protection policies.
4. Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

Our obligations as an employer

We will use your particularly sensitive personal information in the following ways:

- We will use information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws.
- We will use information about your physical or mental health, or disability status, 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.
- We will use information about your race or national or ethnic origin, religious, philosophical, or moral beliefs, to ensure meaningful equal opportunity monitoring and reporting.
- If you apply for ill-health pension under a pension arrangement operated by us.
- If you are leaving employment due to ill health and are potentially entitled to shares and the information is used to make decisions about your entitlement under the share plan.

Do we need your consent?

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

5. Information about criminal convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our data protection policies.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We do not envisage that we will hold information about criminal convictions.

6. Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

1. Where we have notified you of the decision and given you 21 days to request a reconsideration.
2. Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.
3. In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making unless we have a lawful basis for doing so and we have notified you.

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

7. Data sharing

We may have to share your data with third parties, including third-party service providers and other entities in the group.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU.

If we do, you can expect a similar degree of protection in respect of your personal information.

Why might you share my personal information with third parties?

We may share your personal information 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.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents) and other entities within our group. The following activities are carried out by third-party service providers: payroll, pension administration, benefits provision and administration, IT services.

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 are required to take appropriate security measures to protect your personal information in line with our policies. We 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.

When might you share my personal information with other entities in the group?

We will share your personal information with other entities in our group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data. We may also share the information when people are transferring to other Publicis Groupe agencies.

What about other third parties?

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

8. Transferring information outside the EU

We may transfer the personal information we collect about you to the following countries outside the EU -US, Costa Rica, India in order to perform our contract with you and as part of our legitimate interest reasons set out above (in relation to transfers to other Group entities and third parties). To ensure that your personal information does receive an adequate level of protection there is a valid transfer mechanism in place to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection.

9. Data security

We have put in place measures to protect the security of your information.

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

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality. Details of these measures may be obtained from the Head of Human Resources.

We have put in place procedures 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.

10. Data retention

How long will you use my information for?

We will only retain your personal information 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. Details of retention periods for different aspects of your personal information are available in UK Personnel Records: Retention & Erasure Guidelines which is available from the HR department. 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 unauthorised 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.

In some circumstances we may anonymize your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee, worker, or contractor of the company we will retain and securely destroy your personal information in accordance with UK Personnel Records: Retention & Erasure Guidelines.

11. Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

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

Your rights in connection with personal information

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

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request the erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to stop processing personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

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

No fee usually required

You will not have to pay a fee to access your personal information (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 we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

12. Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing, and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for

that specific processing at any time. To withdraw your consent, please contact the Head of Human Resources. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

13. Changes to this privacy notice

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 information.

If you have any questions about this privacy notice, please contact the Head of Human Resources.

APPENDIX 1

Purpose	Examples of personal data that may be processed	Grounds for processing
Recruitment	Information concerning your application and our assessment of it, your references, any checks we may make to verify information provided and any information connected with your right to work in the UK. If relevant, we may also process information concerning your health, any disability and in connection with any adjustments to the interview process and working arrangements.	Contract Legal obligation Legitimate interests
Your employment contract including entering it, performing it and changing it.	<ul style="list-style-type: none"> Personal contact details such as name, address, business and personal e-mail address. Employment records (including job titles, work /education history and working hours). Recruitment records (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). Providing certain benefits to employees. For example, this might involve liaising with our pension, life assurance or private healthcare providers as relevant. 	Contract Legal obligation Legitimate interests
Contacting you or others on your behalf	<ul style="list-style-type: none"> Contact details such as those outlined above and telephone numbers. 	Contract Legitimate interests

<i>Purpose</i>	<i>Examples of personal data that may be processed</i>	<i>Grounds for processing</i>
Payroll administration	<ul style="list-style-type: none"> National Insurance number. Student Loan information. Bank account details, payroll records and tax status information. Salary, annual leave, pension, benefits and sickness certificates. 	Contract Legal obligation Legitimate interests
Supporting and managing your work and performance and any health concerns	<ul style="list-style-type: none"> Performance information. Work history, working hours and training records. Health and sickness records ascertaining an employee's fitness to work. Managing sickness absence. 	Contract Legal obligation Legitimate interests
Changing or ending your working arrangements	<ul style="list-style-type: none"> National Insurance number. Bank account details, payroll records and tax status information. Salary, annual leave, pension and benefits information. Personal contact details such as name, address, telephone number and personal e-mail address. Exit interview data. 	Contract Legal obligations Legitimate interests
Physical and system security	<ul style="list-style-type: none"> CCTV footage and other information obtained through electronic means such as swipecard records. Information about your use of your communications systems 	Legal obligation Legitimate interests
Providing references in connection with your tenancy, mortgage and visa applications	<ul style="list-style-type: none"> Salary information, job titles and work history. 	Consent Legitimate interests
Providing references in connection with your	<ul style="list-style-type: none"> Job title and work history. 	Consent Legitimate interests

Purpose	Examples of personal data that may be processed	Grounds for processing
finding new employment		
Providing information to third parties in connection with transactions that we contemplate or carry out	<ul style="list-style-type: none"> National insurance number. Bank account information. 	Legitimate interests
Monitoring of diversity and equal opportunities	<ul style="list-style-type: none"> Equal opportunities monitoring forms. 	Legitimate interests
Implementing Family Policies	<ul style="list-style-type: none"> Personal contact details such as name, address and personal e-mail address. Employment records (including work history and working hours). National insurance number. Due date / expected placement date. Relationship to child. 	Legitimate interests
Monitoring and investigating compliance with policies and rules – both generally and specifically	<ul style="list-style-type: none"> Disciplinary and grievance information. Information about your use of the company's information and communications systems. 	Legitimate interests
Disputes and legal proceedings	<ul style="list-style-type: none"> Recruitment information. Employment records. Performance information. Disciplinary and grievance information. 	Legitimate interests Legal obligation

<i>Purpose</i>	<i>Examples of personal data that may be processed</i>	<i>Grounds for processing</i>
Day to day business operations including marketing and customer/client relations	<ul style="list-style-type: none"> • Photographs. • Names. • Location of employment/workplace. • Career biographies. 	Contract
Maintaining appropriate business records during and after your employment	<ul style="list-style-type: none"> • Work history. • Training records. • Professional memberships. • Next of kin and emergency contact information. 	Legitimate interests