



Data Protection Policy

You must read this policy because it gives important information about:
the data protection principles with which the Company must comply;
what is meant by personal information (or data) and sensitive personal information (or data);
how we gather, use and (ultimately) delete personal information and sensitive personal information in accordance with the data protection principles;
where more detailed privacy information can be found, e.g. about the personal information we gather and use about you, how it is used, stored and transferred, for what purposes, the steps taken to keep that information secure and for how long it is kept;
your rights and obligations in relation to data protection; and
the consequences of failure to comply with this policy.

Introduction

The Company obtains, keeps and uses personal information (also referred to as data) about job applicants and about current and former employees, temporary and agency workers, contractors, interns, volunteers and apprentices for a number specific lawful purposes.

This policy sets out how we comply with our data protection obligations and seek to protect personal information relating to our workforce. Its purpose is also to ensure that staff understand and comply with the rules governing the collection, use and deletion of personal information to which they may have access in the course of their work. We are committed to complying with our data protection obligations, and to being concise, clear and transparent about how we obtain and use personal information relating to our workforce, and how (and when) we delete that information once it is no longer required.

The Company's data protection officer, Steven Wilson, is responsible for informing and advising the Company and its staff on its data protection obligations, and for monitoring compliance with those obligations and with the Company's policies. If you have any questions or comments about the content of this policy or if you need further information, you should contact the data protection officer.

Scope

This policy applies to the personal information of job applicants and current and former staff, including employees, temporary and agency workers, interns, volunteers and apprentices.

Staff should refer to the Company's *data protection privacy notice* and, where appropriate, to its other relevant policies including in relation to *internet, email and communications, monitoring, social media, information security, data retention and criminal record information*, which contain further information regarding the protection of personal information in those contexts.

We will review and update this policy at least annually in accordance with our data protection obligations. It does not form part of any employee's contract of employment and we may amend, update or supplement it from time to time. We will circulate any new or modified policy to staff when it is adopted.