



EMPLOYEE PRIVACY NOTICE

Data controller: Signature Flatbreads UK Ltd., C, Innovation House, Chiltern Industrial Park, Boscombe Rd, Dunstable LU5 4LT, Tel: +44 (0) 1582 671 611

What is UK GDPR?

General Data Protection Regulation (GDPR) (2016/679 EU) now UK GDPR with effect 1 January 2021 under the Data Protection Act 2018. UK GDPR requires employers to be transparent about the personal data that they hold and how it is being used. We have updated our policies and guidance to adopt this new legislation. This notice is to inform you how we use your personal data and how it is processed.

Signature Flatbreads collects and processes personal data relating to its employees to manage the employment relationship. The Company is committed to being transparent about how it collects, uses that data, and is committed to its data protection obligations.

What data does Signature Flatbreads collect?

The Company collects and processes a range of information about you. This includes:

1. Your name(s)
2. Home address
3. Contact details including email address and telephone number
4. Date of birth and gender
5. The terms and conditions of your employment
6. Details of your qualifications
7. Details of your skills, experience, and employment history
8. Information about your remuneration, including entitlement to benefits such as pensions
9. Details of your bank account and national insurance number



10. Information about your marital status
11. Next of kin or emergency contacts
12. Information about your nationality and entitlement to work in the UK
13. Details of your working schedule (days of work and working hours) and attendance at work
14. Details of periods of leave taken by you, including holiday, sickness absence, family leave such as maternity leave and the reasons for the leave
15. Details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence
16. Training you have participated in
17. Information about medical or health conditions
18. Details of trade union membership

What is Signature's source of information?

The Company collects this information in a variety of ways. For example, data is collected through 'new starter' application forms, CVs, your passport, or other identity documents such as your birth certificates; data is also collected from other forms completed by you at the start of or during employment; from correspondence with you; or through interviews, meetings, or other assessments.

Who are the recipients of your data?

The Company shares your data with third parties that process data on its behalf in connection with benefits that form part of your employment with us, and which includes High 5 and Reward Gateway our benefits platform and the provision of occupational health services. The Company seeks information from third parties with your consent only. Personal data will only be shared under the following legal basis, one or more of which may apply in any particular case:

- Article 6(1)a: the data subject has given consent to the processing of his or her personal data for one or more specific purpose
- Article 6(1)b: processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of a data subject prior to entering into a contract



- Article 6(1)c: processing is necessary for compliance with a legal obligation to which the controller is subject
- Article 6(1)d: processing is necessary to protect the vital interests of the data subject or other natural persons
- Article 6(1)e: processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller

Also, with Article 9 and in particular:

- Article 9 (2) d: Processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects.
- These Legitimate interests are relevant of any data sharing with our rewards partners Reward Gateway and in relation to Employee of the month High 5. If you have any objection to us sharing this data, please contact HR@signatureflatbreads.com or call 01582 676466.

We may also from time to time, when necessary and under proper legal basis share data with the following:

- Family, associates, and representatives of the person whose personal data we are processing
- Past or prospective employers
- Letting agencies
- Healthcare, social and welfare organisations
- Educators and examining bodies
- Suppliers and service providers
- Financial organisations
- Debt collection and tracing agencies



- Auditors
- Police forces, security organisations
- Courts and tribunals
- Prison and probation services
- Legal representatives
- Local and central government
- Consultants and professional advisers
- Trade union and staff associations (Article 6(1)a)
- Survey and research organisations
- Press and the media
- Voluntary and charitable organisations
- Research collaborators, agents, and contractors

Data is stored in a range of different places, including in your personnel file, in the Company's HR management system (ADP) and in other IT systems (including the Company's email system).

Why does Signature Flatbreads process personal data?

The Company needs to process data to enter an employment contract with you and to meet its obligations under your employment contract. For example, it needs to process your data to provide you with an employment contract, to pay you in accordance with your employment contract and to administer benefits such as pension entitlements.

What is Signature's legal basis for processing your personal data?

The Company needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check an employee's entitlement to work in the UK, to deduct tax, to comply with health and safety laws and to enable employees to take periods of leave to which they are entitled.

Purpose of processing your data?

We believe the Company has a legitimate interest to process your personal data before, during and after the end of the employment relationship. Processing employee data allows us to:

1. Run recruitment and promotion processes
2. Maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency), and records of employee contractual and statutory rights
3. Operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace
4. Operate and keep a record of employee performance and related processes, to plan for career development, and for succession planning and workforce management purposes;
5. Operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled;
6. Obtain occupational health advice, to ensure that it complies with duties in relation to individuals with disabilities, meet its obligations under health and safety law, and ensure that employees are receiving the pay or other benefits to which they are entitled;
7. Operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to allow effective workforce management, to ensure that the Company complies with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled;
8. Ensure effective general HR and business administration;
9. Provide references on request for current or former employees;
10. Respond to and defend against legal claims; and
11. Maintain and promote equality in the workplace.

Some special categories of personal data, such as information about health or medical conditions, is processed to conduct employment law obligations (such as those in relation to employees with disabilities and for health and safety purposes). Information about trade union membership is processed to allow the Company to operate check-off for union subscriptions. When the Company processes other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief, this will be done for the

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purposes of equal opportunities monitoring only and with your consent.

Data that the Company may use for these purposes will be anonymised or will be collected with the express consent of employees, which can be withdrawn at any time. Employees are entirely free to decide whether to provide such data and there are no consequences of failing to do so.

Who has access to your data in Signature?

Your information will be shared internally, including with members of the HR, H & S and payroll team, your reporting manager(s), managers in the business area in which you work, IT and Security staff will have access to your personal information if access to the data is necessary for performance of their roles.

Does Signature share or transfer your data outside the European Economic Area?

The Company does not as a rule transfer staff data outside the European Economic Area or any other country without your express consent.

How does Signature protect your data?

The Company takes the security of your data seriously. The Company has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused, or disclosed, and is not accessed except by its employees in the performance of their duties. For example:

- All hard copies personnel files are kept within the HR Department and are locked away
- Signature network is protected from external threats using the latest hardware firewall with strict business rules for traffic flow.
- Latest antivirus and local restriction policies are additional layers of security to protect the infrastructure from potential threats like hacking and viruses.
- Signature uses the network SAN drives to store the Company's data which has redundant disks and daily backups to ensure we have copy of data to recover in any eventuality.
- All data on the network drive is secured using security permissions and only



permitted users are allowed to access their shares.

- Emails/Internet access is strictly restricted to pre-approved users and only permitted websites are allowed to ensure security while browsing the internet.
- CCTV cameras are installed on premises for monitoring purposes, and for the safety of our employees, visitors, contractors and to prevent malicious damage, or monitor staff related issues and images may be used in any investigation or disciplinary process.

Further details on security of your data can be found within the Company's IT policy.

Where the Company engages third parties to process personal data on its behalf, they do so because of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

For how long does Signature keep data?

The Company will hold your personal data for the duration of your employment. The periods for which your data is held after the end of employment are:

1. The Company needs to be able to confirm who has been a member of staff, and to keep details of their employment history. Therefore, certain information about former members of staff may be retained permanently.
2. The Company will keep your right to work in the UK records for six additional years from the end of your employment
3. HMRC requires all employers to retain financial records for six years from the end of the last company financial year they relate to, or longer if:
 - a) they show a transaction that covers more than one of the company's accounting periods
 - b) the company has bought something that it expects to last more than 6 years, like equipment or machinery
 - c) you sent your Company Tax Return late
 - d) HMRC has started a compliance check into your Company Tax Return



What are your rights under the UK GDPR?

As a data subject, you have the following rights under UK GDPR:

- a) Access and obtain a copy of your data on request;
- b) The right to erasure (the right to be forgotten)
- c) Require Signature Flatbreads to change incorrect or incomplete data;
- d) Object to the processing of your data where Signature Flatbreads is relying on its legitimate interests as the legal ground for processing; and
- e) Ask Signature Flatbreads to stop processing data for a period if data is inaccurate or the Company's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact the HR department via HR@Signatureflatbreads.com. You are entitled to a copy of all the information the Company holds about you, although you may not be able to receive information which identifies or relates to anybody else. You will be required to answer certain security questions, provide proof of identity, such as a photograph and a signature. You are also required to complete the Company's Data Subject Request Form.

The right to be forgotten?

The rights of erasure (the right to be forgotten) does not apply to staff data held by Signature Flatbreads for most purposes. Signature Flatbreads does not use any personal data for marketing purposes, and if it does anytime in the future, a request can be made for this to be erased. To exercise this right, please contact the HR Department.

Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with our Data protection Officer Matthew Keefe of Keefe and Associates Ltd who can be contacted on 01582 676466 or HR@signatureflatbreads.com.

To make a complaint, please contact our data protection officer.



Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Incorrect information and rectification?

If you believe any of your Company's personal data is incorrect, you should amend it via ADP. If you cannot make the required change via ADP, please contact the Human Resources department.

What if you do not provide us with your personal data?

The Company relies on having up to date and correct information about its employees. Employees have a responsibility to inform the Company if we are holding incorrect information and giving us a chance to put things right.

Therefore, you have some obligations under your employment contract to provide the Company with data. You are required to report absences from work and may be required to provide information about disciplinary or other matters under the implied duty of mutual trust and confidence. You may also have to provide the Company with data to exercise your statutory rights, such as in relation to statutory leave entitlements (i.e., maternity leave).

Failing to provide the data may mean that you are unable to exercise your statutory rights. Certain information, such as contact details, your right to work in the UK and payment details, must be provided to enable the Company to enter a contract of employment with you. If you do not provide other information, this will hinder the Company's ability to administer the rights and obligations arising because of the employment relationship efficiently.

When will this Notice be updated?

This privacy notice was last updated on 21 November 2022.

We reserve the right to vary and amend this privacy notice to comply with the changes to



legislation. A up to date copy of this notice will be available on the Company website.