

Privacy Notice

in respect of Norfolk Capital Limited and its subsidiaries

This privacy notice applies to current and former employees, workers and contractors of the Company. It also applies to anyone applying to the Company for employment or who is looking to become a worker or contractor. This is who “you” and “your” refer to in this privacy notice.

In this privacy notice Norfolk Capital Group means Norfolk Capital Limited and those companies which are its subsidiaries.

If you are (or were) an employee of a company in the Norfolk Capital Group, “we”, “us” and “the Company” each refer to that company that is (or was) your employing company.

If you are reading this in respect of a time when you are considering or making an application for employment with a company in the Norfolk Capital Group, “we”, “us” and “the Company” each refer to that company that you are applying to.

This notice does not form part of any contract of employment or other contract to provide services.

The purpose of this document

Each company within The Norfolk Capital Group is committed to protecting the privacy and security of your personal information.

This privacy notice, which has been produced in accordance with the General Data Protection Regulation (GDPR), describes how we collect and use personal information about you before, during and after your working relationship with us.

It applies to all employees, workers and contractors. It also applies to anyone applying for employment within the Norfolk Capital Group or applying to become a worker or contractor.

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

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Data protection principles

We will comply with data protection law. This says that we are responsible for ensuring that the personal information we hold about you is:

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.

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 personal identifiers have been removed (anonymised data).

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

We may collect, store, and use the following types of personal information about you:

- Personal contact details, such as name, title, addresses, telephone numbers, and personal email addresses
- Date of birth
- Gender
- Marital status and dependants
- Next of kin and emergency contact information
- National Insurance number
- Bank account details, payroll records and tax status information
- Salary, annual leave, pension and benefits information
- Start date
- Location of employment or workplace and details of any work travel
- Proof of residency information such as copy of driving licence, utility bill or bank statements
- Recruitment information (including copies of right to work documentation (passports and/or visas), references and other information included in a CV or cover letter or as part of the application process)
- Information about your financial background and credit history, including CCJs and attachment of earnings orders
- Information in relation to any current or previous positions of responsibility held by you, for example directorships, controllers, performance of controlled functions
- Information on any previous restrictions on employment or regulatory misconduct
- Employment records (including employers, job titles, work history, working hours, training records and professional memberships)
- Qualification and exam records
- Remuneration and benefits history including SSP, SMP and attachments of earnings orders
- Attendance and absence information
- Performance and quality and compliance information

- Disciplinary and grievance information
- CCTV footage and other information obtained through electronic means, including records of the use of access swipecards
- Routinely monitored, internet and email data obtained in proactive security scanning processes, including monitoring of internet usage, emails, profanity/content filters and login access
- Recordings of telephone calls that you are a party to when using our equipment or facilities.

We may also collect, store and use the following more sensitive personal information (the GDPR refers to it as “special category data”):

- Information about your health, including any medical condition, medical reports and health and sickness records.
- Information about criminal convictions and offences.

The kind of information we hold about your dependents and other people closely associated with you

We may also collect from you, store and use the following categories of personal information about your dependents and other people closely associated with you:

- Name
- Address
- Telephone number
- Date of birth
- Gender
- Their relationship to you

Typically, this information will have been voluntarily provided by you for the provision of healthcare and/or in connection with life assurance benefits. It may also have been voluntarily provided by you for next of kin/emergency contact information.

How we collect your personal information

We typically collect personal information about you through the application and recruitment process, either directly from you or, sometimes, from an employment agency or background check provider. We may sometimes collect additional information about you from others with information about you, such as former employers, people who you have said will act as a referee for you, credit reference agencies, the Disclosure and Barring Service (DBS) and other background check agencies.

We will collect additional personal information in the course of work-related activities throughout the period you are working for us or are providing services to us. We may also receive information about you from others before, during and after that period, such as medical practitioners, colleagues, the Courts and HMRC.

When we will use information about you

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 entered into with you.
2. Where we need to comply with a legal obligation to which we are subject.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests or fundamental rights and freedoms 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 vital interests (or someone else's interests).
2. Where necessary for the performance of a task carried out in the public interest.

Situations in which we will use your personal information

We need all the types of information in the list above (see *The kind of information we hold about you*) 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 others, provided your interests and fundamental rights do not override those interests. We will process your personal information for:

- Making a decision about your recruitment or appointment
- Determining the terms on which you work for us
- Checking you are legally entitled to work in the UK
- Paying you and, if you are an employee, deducting and making income tax and National Insurance Contributions payments
- Providing the following benefits to you:
 - a) Private medical insurance
 - b) Pension
 - c) Life assurance
- Liaising with your pension provider
- Administering the contract that we have entered into with you
- Administering contracts that you have entered into with others
- Business management and planning, including accounting and auditing
- Conducting performance reviews, managing performance and determining performance requirements
- Assessing quality and compliance for training and monitoring purposes
- Making decisions about salary reviews and compensation
- Assessing qualifications for a particular job or task, including decisions about promotions
- Gathering evidence for possible grievance or disciplinary hearings
- Making decisions about your future employment or engagement
- Making arrangements for the termination of our working relationship

- Providing references to future prospective employer(s)
- Education, training and development requirements
- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work
- Complaint handling
- Ascertaining your fitness to work
- Managing sickness absence
- Complying with our health and safety obligations
- To detect and prevent fraud
- Monitoring your use of our information and communication systems to ensure compliance with our IT policies
- Ensuring network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution
- Conducting data analytics studies to review and better understand employee retention and attrition rates
- Equal opportunities monitoring
- Planning, testing and implementing business recovery processes
- Managing our relationship with, and meeting our obligations to, regulators, HMRC and Companies House
- Managing our relationships with others (including other members of the Norfolk Capital Group) with whom we have a business relationship.

Some of the above 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 that 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, where this is required or permitted by law, we may process your personal information without your knowledge or consent, in compliance with the above rules.

How we use particularly sensitive personal information

We need to have further justification for collecting, storing and using "special category data" (that is, particularly sensitive personal information prescribed as such by law). We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where necessary to carry out our legal obligations and/or exercise our rights in the areas of employment and social security and social protection law.
3. Where necessary in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme.
4. Where necessary 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. We may also, with the appropriate safeguards, process such information you in the course of legitimate business activities.

Our obligations as an employer

We will use your particularly sensitive personal information in one or more of the following ways:

- We will use information relating to leaves of absence, which may include sickness absence, jury service, military service 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 (and that of others) 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 in relation to criminal offences (including spent convictions for people operating in controlled functions) to assess your suitability to work within financial services.

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.

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.

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 may also process such information about you in the course of legitimate business activities with the appropriate safeguards.

We envisage that we will hold information about criminal convictions.

We will only collect information about criminal convictions if it is appropriate given the nature of your role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process. We may also be notified of such information directly by you or others in the course of you working for us. Such information may also reach our attention through it being in the public domain (such as press reports). We will use information about criminal convictions and offences in the following ways:

- Assessing your suitability to work within financial services
- Assessing your suitability and alignment with our values and expected behaviours.

We are allowed to use your personal information in this way to pursue legitimate interests of our own or those of third parties, namely meeting our obligations to ensure that those engaged, or to be engaged by us are fit and proper persons to work within financial services (and as required by our regulators if we are regulated).

Data sharing

We may have to share your data with others, including those providing services to us, and to other companies in the Norfolk Capital Group.

If we share your personal data with others so that they can process it for us under our control:

- they will be required to respect the security of your data and to treat it in accordance with the law
- It will not be transferred outside of the EU.

Why we might share your personal information with others

We may share your personal information with others 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.

Service providers who might process your personal information

Where we engage others to provide services to us in connection with employees we may provide your personal data to them, to process under our control. The following activities are all carried out by third-party service providers:

- payroll services
- pension administration
- benefits administration
- IT services.

In some cases, the immediate service provider is a company in the Norfolk Capital Group, usually Norfolk Capital Management Services Limited (NCMSL). We may also provide your personal data to other companies in the Norfolk Capital Group where they have a legitimate interest in processing it.

Security of information provided to service providers and other companies in our group

All our service providers and other companies in the Norfolk Capital Group are required to take appropriate security measures to protect your personal information in accordance with the law. We do not allow 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 we might share your personal information with other companies in the Norfolk Capital Group

As mentioned above, NCMSL, a company in the Norfolk Capital Group, provides certain management services, including in relation to payroll and benefits, HR and IT, to us, and we will provide your personal data to NCMSL as necessary for that purpose. NCMSL will process that data under our control.

We have a business continuity plan (sometimes called a disaster recovery plan) the operation of which assumes that assistance will be available to us from other companies in the Norfolk Capital Group if the plan needs to be implemented. We may share your personal data with other companies of the Group if it is necessary for the purposes of developing, testing, maintaining and implementing that plan (or any of those purposes).

We may share your personal information with other entities in the Norfolk Capital 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 and for the development of the Norfolk Capital Group (such as in the context of succession planning).

When we might share your personal information outside the Norfolk Capital Group

We may share your personal information with others outside the Norfolk Capital Group, for example in the context of the possible sale or restructuring of the business, or where we are seeking professional services e.g. auditors, legal and tax advisors, consultants, insurance brokers, pensions advisers etc. We may also need to share your personal information with a regulator or government agency, or otherwise to comply with the law.

Also, in the course of providing services to us, NCMSL may need to provide your personal data to third parties who assist it, such as payroll and pensions administration service providers in the provision of those services, or who provide products and services to it, such as insurers.

We may share limited personal information to future employers, where this is requested and your permission has been given, in the provision of employment references.

If you work for a company within the Norfolk Capital Group that is regulated, and you either operate in a controlled function or plan to move to a role outside of the company where you may operate in controlled function, we may need to share more detailed personal information about you with prospective employer(s), where required to comply with obligations placed on us by a regulator.

If you work for a company within the Norfolk Capital Group that is regulated, and you either operate in a controlled function or plan to move into a controlled function, we will provide information about you to any relevant regulator. This will be done in connection with our legal obligations. This will also apply to you if,

once the Senior Manager’s Regime applies to the Company, you are engaged in, or it is proposed that you be engaged to perform a “senior management function”.

Depending on your role, we may provide information about you to others (including, on occasion, other companies in the Norfolk Capital Group) that the Company enters (or is proposing to enter) into business relationships with.

If you are (or are proposing to be appointed as) a director of a company in the Norfolk Capital Group, we may provide information about you to others that provide banking and other services to companies in the Norfolk Capital Group. This will be to enable them to operate the banking or other business relationship, including carrying out “know your customer” (KYC) checks.

If you are (or are proposing to be appointed as) a director of a company in the Norfolk Capital Group, we will provide information about you to Companies House. We will also notify HMRC that you have been appointed as a director.

Data security

We have put in place measures to protect the security of your information. Details of these measures are detailed in our Employee Data Retention Policy which is available on CascadeGo.

If we provide your personal data to others in connection with a service that they are providing to us we require that they 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 intended to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Also, we limit access to your personal information to those people and organisations who have a need to know for the relevant purposes. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

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.

Data retention periods

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 our Employee Data Retention Policy which is available on CascadeGo.

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 and, where relevant, any regulatory, requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you; we may use such anonymised 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 our Employee Data Retention Policy and applicable laws and, where relevant, any regulatory requirements.

Rights of access, correction, erasure, and restriction

Informing 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 your personal information held by us

By law, under certain circumstances:

- you have the right to request access to your personal information (this is done by making what is 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;
- you have the right to 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;
- you have the right to 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);
- you have the right to 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; and
- you have the right to 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 HR in writing. We may not be able or obliged to comply with your request in certain circumstances. If we cannot comply with your request we will tell you why.

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). We may, however, 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 if you want to access the personal data we hold about 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.

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 by us 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 HR. 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.

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.

Right to complain

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 hope that you would first try to resolve your complaint with us.

If you have any questions about this privacy notice or how we handle your personal information, please contact HR.