

Employee Privacy Policy

Purpose and Scope

Mitie is committed to complying with its legal obligations under the UK Data Protection Act 2018, UK GDPR and the EU GDPR to protect the rights and freedoms of its personnel and other individuals whose personal data Mitie obtains or generates as part of its business operations.

Application

This Employee Privacy Policy applies to current and former employees, workers, individual contractors, candidates and other individuals employed or engaged with Mitie's business. You must read this policy and any additional privacy notice we may provide on specific occasions during your employment or engagement.

This policy does not form part of your employment contract or other contracts to provide services.

This policy describes:

- how and why we collect, store, use and share personal data relating to current, former and prospective Mitie personnel;
- information about individuals' rights concerning their personal data; and
- who to contact if you have a complaint.

In this policy, "we", "us", and "our" means Mitie Limited and any other Mitie group company responsible for any personal information collected about you.

What personal data do we collect and process?

To operate our business and fulfil our legal obligations as an employer, we need to collect personal data from our employees, workers, individual contractors, candidates, and other individuals whom we engage in connection with our business.

We are committed to ensuring that the personal data we collect, and use is appropriate for this purpose and does not constitute an invasion of an individual's privacy.

Before, during and after your employment or engagement by us, we collect, use, process and store your personal information, which may include:

- Your name
- Your address, personal email address, telephone number and other contact details
- Next of kin and emergency contact information, as well as further information relating to your family
- Family members and children, if you provide those to us to receive certain benefits
- Your national insurance number, gender, ethnicity, date of birth and other personal identifiers
- Your bank account details, payroll records and tax status
- Information relating to your performance, attendance, absence, and sickness
- Information relating to grievance and disciplinary processes
- Salary, annual leave, and pensions information, as well as other personal information relating to your benefits
- Information about your use of Mitie equipment, hardware information, and communication systems, including information regarding telephone, email, and internet usage
- Location information includes:
 - Pinning data
 - Vehicle tracking data
 - Dashboard camera and audio data (Fleet Vehicles)
 - Access pass data
 - CCTV image

We may also collect sensitive personal data such as medical information, including information relating to:

- Your physical and mental health and wellbeing
- Information relating to criminal convictions and offences
- Trade Union membership
- Health and safety-related information
- Details relating to disability, access, or special requirements
- Diversity and equality information

We collect personal information about our employees, workers, individual contractors, candidates, and other individuals we engage in connection with our business in many different ways. Including:

- Job application, recruitment and TUPE processes
- From you directly (for example, when you complete a form or communicate with us by email, telephone, in person or by post)
- From a former employer
- Our clients, recruitment agencies or other third parties.

We may also receive personal data from third parties, Government security services, and police forces where you are the subject of a vetting or security clearance process. This information may include:

- Details of your employment and education history
- References
- Home or residential address history
- Professional memberships and qualifications
- Visa and immigration records
- Credit check results
- Criminal records check results
- DVLA/DVA details
- Proof of identity
- Right to work documents.

How do we use your personal data?

We use your personal information for several purposes connected to our business's legitimate interests and fulfil our legal obligations to you (including our obligations under our contract with you). These include:

- Making decisions about your recruitment or appointment which may involve undertaking profiling/recruitment processes that apply automatic filtering
- Payment of salary, wages, national insurance, tax, pension contributions and expenses
- Conducting grievance and disciplinary processes, hearings, and investigations
- Performance management and learning and development activities
- Administering payroll lending, pensions, share schemes and other benefit arrangements
- Monitoring attendance, shift patterns, working hours and managing staffing levels and absence
- Undertaking reference checks, vetting, onboarding and offboarding processes and verifying rights to work
- Dealing with legal disputes regarding you, our clients, suppliers and others
- Maintaining appropriate levels of conduct and performance
- Ensuring compliance with our policies and the terms of your employment or engagement by us
- Analysing employee engagement, retention, and attrition rates

The use of your Personal Email address

Mitie relies on Legitimate Interest and Consent as a lawful basis to contact you at your Personal Email Address. The following table explains our lawful basis and the type of communication.

Type of communication	Critical Legitimate Interest	Non-critical Consent
Affects employee terms and conditions	✓	
Affects employee health and safety	✓	
Information updates that all employees need to be aware of will impact employee engagement adversely if not received	✓	
Updates employees on key priorities		✓
Communication about material matters impacting Mitie	✓	
Communication about adverse impact on Customer's circumstances	✓	

If you have provided your personal email address or other contact details, including personal phone number(s), during your role, you must ensure these are accurate.

It may be necessary to use your personal email address or emergency contact details in an attempt to contact you if:

- We have tried to use the default details you provided at the start of your employment with Mitie and are concerned for your welfare.
- You have left the organisation and retained the equipment you used as part of your role.
- You have left the organisation and retained property issued by a Mitie client in conjunction with your role.

Who your information will be shared with

From time to time, we may disclose your personal information to any member of our group, which means Mitie Group plc and its subsidiaries.

We may also disclose your personal information to third parties in certain circumstances, including:

- Clients, third-party suppliers, service providers, professional advisors and other business partners to enable us to provide or receive products or services
- HM Revenue and Customs and other regulatory or supervisory authorities for accounting, tax and regulatory compliance
- Law enforcement agencies in connection with the prevention or investigation of unlawful activity
- Third-party audit agencies engaged by our clients or suppliers
- Third parties who provide support services for the operation and administration of our business, including IT, finance, auditing and accounting, HR, marketing, business development and consultancy services
- Third-party suppliers who administer benefit arrangements, including our Payroll Lending Service, Sharesave and other share incentive or option plans
- Potential new employers in response to reference requests
- Prospective buyers or sellers of any business or assets we sell or acquire

We may disclose or share your personal data if we are under a duty to do so to comply with any legal obligation or, where necessary, to enforce any legal right or contractual agreement, or to protect the rights, property, or safety of Mitie, our employees, customers, or others. Including exchanging information with other companies, organisations and bodies for fraud protection and credit risk reduction.

On what basis do we process personal data?

The basis on which we process data will depend on the nature of the information collected and the purposes for which we use it but will be one or more of the following:

- **Consent:** applicable where you have provided your consent for us to process your personal data for a specific purpose
- **Contract:** applicable where the Processing is necessary for a contract you have with us or because you have asked us to take specific steps before entering into a contract
- **Legal obligation:** applicable where the Processing is necessary for us to comply with our legal obligations
- **Vital interests:** applicable where the Processing is necessary to protect someone's life
- **Legitimate interests:** applicable where the Processing is necessary for our legitimate interests or the legitimate interests of a third party

How do we keep your information secure?

We have appropriate security, technical and organisational measures to prevent personal information from being accidentally lost, used, or accessed in an unauthorised or unlawful way. We restrict access to your personal information to those who have a genuine business reason to access it, those processing your information and are subject to confidentiality duties.

How long do we retain personal data?

Mitie will only retain personal information for the period necessary to fulfil the purposes for which it is collected and processed. We may keep personal information shorter or longer as prescribed by applicable law or Mitie's internal policies and procedures. Further information on our retention policy can be requested by contacting privacy@mitie.com.

Transfer of your personal information out of the United Kingdom

The data we collect from you may be transferred to and stored at a destination outside the United Kingdom, including the European Union or EEA countries and the United States of America. Processing may also occur by staff operating outside the United Kingdom who work for one of our suppliers or us. These staff may engage in, among other things, the fulfilment of an order, processing your payment details and providing support services. You agree to this transfer, storing or processing by submitting your personal data. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Employee Privacy Policy.

Personal data may be used by our transactional finance partners, Genpact International Inc., for billing, invoicing and payment purposes. The services Genpact provide to us are delivered from their service centre in India.

Our IT service partner, Wipro Limited, may also use personal data for purposes connected with your IT equipment or systems. The services Wipro provide to us are delivered from their service centre in India.

Our websites and applications

Where we have given you (or where you have chosen) a password that enables you to access certain websites or applications, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee data transmission to our websites or applications; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to prevent unauthorised access.

Links to other websites

From time to time, our websites may contain links to and from the websites of our partner networks, advertisers, and affiliates. If you follow a link to any of these websites, please note that they have their own privacy policies or notices, and Mitie does not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Your rights

As a data subject, you have certain rights you may exercise if we hold or process your personal data.

Specifically:

- **The Right to be Informed** – you have the right to be informed about the collection and use of your personal data
- **The Right of Access** – you have the right to request a copy of the information that we hold about you
- **The Right of Rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete
- **The Right to Erasure** – you have a right, in certain circumstances, to ask for the data we hold about you to be erased from our records
- **The Right to Restrict Processing** – where certain conditions apply, you have a right to restrict the processing
- **The Right to Data Portability** – you have the right to have the data we hold about you transferred to another organisation
- **The Right to Object** – you have the right to object to certain types of processing, such as direct marketing.

For further information on each of these rights, including the circumstances in which they apply, see the UK Information Commissioners Office ("ICO") information on individual's rights under the UK General Data Protection Regulation and the UK Data Protection Act 2018 <https://ico.org.uk/your-data-matters/>

Contact Information

Our Data Protection Officer is responsible for managing personal data within Mitie and ensuring compliance with data protection legislation and good practise can be demonstrated. Questions, comments and requests regarding this Employee Privacy Policy or our collection or use of personal data should be addressed to:

The Data Protection Officer

Mitie Group plc
Level 12, The Shard
32 London Bridge Street
London SE1 9SG
Email: privacy@mitie.com

Complaints

If you wish to make a complaint about how your personal data is being processed by us (or third parties referred to in this Employee Privacy Policy) or how your complaint has been handled; you have a right to complain with our Data Protection Officer using the contact details above or by contacting the Information Commissioners Office.

<https://ico.org.uk>

Changes to this Employee Privacy Policy

Mitie reserves the right to change this Employee Privacy Policy at any time. To obtain the latest copy of this Employee Privacy Policy, please get in touch with privacy@mitie.com.

We keep this Employee Privacy Policy under regular review. This version was last updated in December 2021 to accommodate the United Kingdom leaving the European Union.

This policy will next be reviewed in December 2022.