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## EMPLOYEE PRIVACY NOTICE

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*In compliance with the EU General Data Protection Regulation, in force from 25 May 2018*

## **\*Multimatic Employee Privacy Notice**

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This Employee Privacy Notice sets out what personal data we retain about you and how we collect and use it, both while you are working for us and afterwards. This Privacy Notice applies to current and former employees at all levels of the organization, and includes contractors, agency workers, consultants, interns, volunteers and other types of workers (together referred to as 'Employees' or 'you').

We are required by data protection law to give you the information set out in this Privacy Notice. It is, therefore, important that you read this Privacy Notice carefully, together with any other similar or additional information that we may give you from time to time about how we collect and use your personal data. You should also read our Data Protection Policy which explains our obligations in relation to personal data, how we keep it secure, and what we expect from you when you are handling personal data in the course of your work.

This Privacy Notice applies from 25 May 2018, when the EU General Data Protection Regulation (GDPR) comes into force. It does not form part of your contract of employment or any other contract to provide work or service for Multimatic, and does not give you any contractual rights. We may update this Privacy Notice at any time.

### **Who is the controller?**

Multimatic is the "controller" for purposes of data protection law. This means that we are responsible for deciding how we hold and use personal data about you, including the way in which any personal data is processed. 'Processing' personal data means any activity that involves the use of personal data (e.g. obtaining, recording, holding, amending, retrieving, using, disclosing, sharing, erasing or destroying personal data). It also includes sending or transferring personal data to third parties.

We do not have an appointed Data Protection Officer, and are not obligated to appoint one. For purposes of overseeing, advising on, and administering compliance with the Data Protection Policy and the relevant data protection law/regulations, we will identify a Data Protection Lead within each division or facility, as appropriate. Usually, the Data Protection Lead will be a member of the HR department and will be the first point of contact on issues relating to data protection.

This Privacy Notice also covers how the Multimatic Corporate Office (Multimatic Inc.) holds and

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\*For the purpose of this Privacy Notice, "Multimatic" means each of Multimatic Ltd. (UK), Multimatic CFT Limited (UK), MTCE Limited (UK), Multimatic Marketing & Service Centre GmbH (Germany), Multimatic Engineering Prague s.r.o. (Czech Republic) and their respective divisions, branches and offices. To the extent any personal data is shared with the Multimatic Corporate Office (Multimatic Inc. (Canada)), reference to Multimatic will also include Multimatic Inc.

uses any personal data about you that we share with them. The Multimatic Corporate Office is based in Canada, outside the European Economic Area (EEA), but it applies the same high standards to data protection compliance as the EEA. The European Commission has issued a decision confirming that Canada provides an equivalent level of protection to personal data.

## What type of personal data do we hold about you?

Personal data means any information about a living natural person that makes that person identifiable. We hold and use various types of personal data about you. This may include (but is not limited to):

- **identification information** (e.g. name, ID card, national identification/insurance numbers or equivalent (as applicable) and passport numbers, nationality, place and date of birth, gender, picture, IP address);
- **contact information** (e.g. postal address and e-mail address, phone numbers);
- **family situation** (e.g. marital status, number of children);
- **tax status** (e.g. tax ID, tax residence);
- **education and employment information** (e.g. places and dates of education, course taken, grades, degrees, designations; recruitment information, details of terms of employment, performance information, disciplinary and grievance matters);
- **payroll and accounting data** (e.g. pay and benefit details, working hours);
- **security data** (e.g. door access, CCTV, use of computers and other technology)

Data protection law divides personal data into two categories: ordinary personal data and special category data. Any personal data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health conditions, sexual life or sexual orientation, or biometric or genetic data that is used to identify an individual is **special category data**. (The rest is **ordinary personal data**).

We hold and use certain sensitive data (special category data) about you, including: sickness absence and medical information; details of time-off taken for family matters which could include information about your physical or mental health conditions. Unless there is a legal obligation for us to do so, we currently do not collect or process personal data related to your racial or ethnic origins, political opinions, religious or philosophical beliefs, trade union membership, sexual life or sexual orientation, or biometric or genetic data. If our policies over these items should change in the future, the changes will comply with applicable data protection laws.

Personal data may be automated (e.g. electronic records such as computer files or in emails) or in manual records which are part of a filing system or are intended to form part of a filing system (e.g. structured paper files and archives).

## **How do we collect your personal data?**

You provide us with most of the personal data about you that we hold and use. Other personal data about you is generated by you in the course of carrying out your duties. For example, you produce personal data which we may hold and use when you create email correspondence, produce documents or use certain equipment such as computers, door entry systems or time management (clocking-in/out) systems.

Some of the personal data we hold and use about you is provided or generated by internal sources as part of running our business. For example, other workers may refer to you in emails or documents, your manager will assess you as part of the performance evaluation process and information about you may be generated as part of our business and operational planning.

Some of the personal data about you that we hold and use may come from external sources. For example: when we offered you a job, we may have collected references from previous employers; we may obtain information about you from publicly available sources such as your LinkedIn profile or other media sources; we may ask for a report from an occupational health professional if you have long-term sickness absence; customers may give feedback about you; we might seek advice from a professional adviser that includes information about you; or your representatives might correspond with us in particular situations.

## **Why do we hold your personal data and on what legal grounds?**

We hold and use your personal data for employment, HR and business administration purposes. This will include, for example: management of our employment relationship with you; administration of pay and benefits; monitoring and assessment of performance; provision and regulation of holidays and other time-off, addressing conduct, disciplinary and grievance issues; performance of day-to-day business activities, etc.

Data protection law specifies the legal grounds on which we can hold and use your personal data.

Most commonly, one or more of the following legal grounds apply when we process your personal data:

- Where we need it for the **performance of the contract** we have entered into with you, whether this is an employment contract, a contract for services or another type of contract. This may include, for example, ensuring that we pay you correctly and that we provide your contractual holiday entitlement.

- Where we need it to comply with a **legal obligation**. Typically, this may include legal obligations such as: the obligation to provide statutory holidays and statutory leave and pay; the obligation to pay the relevant minimum wage; the obligation to comply with limits on working time; the obligation to meet health and safety requirements; the obligation not to discriminate; etc.
- 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. This may include, for example, managing working hours to ensure effective business operations, and monitoring your use of computers or other technology.

We may hold and use your special category data for various purposes including, for example: managing absence and ensuring coverage; making adjustments to your job to accommodate health conditions; facilitating the taking of time-off for family related matters; monitoring equality of opportunity and diversity in our organization and ensuring security of laptops/controlling access to our premises.

Since special category data is usually more sensitive than ordinary personal data, and we need to have an additional legal ground to collect, use and hold it. Most commonly, in addition to the legal grounds listed above, one or more of the following legal grounds apply when we process your special category data:

- Where we need to exercise our **legal rights** or carry out our **legal obligations** in relation to employment or social security, and the processing is consistent with our Data Protection Policy.
- Where it is needed in the **public interest**, such as for equal opportunities monitoring, and the processing is consistent with our Data Protection Policy.
- Where it is needed for **assessment of your working capacity** on health grounds, subject to appropriate confidentiality safeguards.

Occasionally, we may also hold and use ordinary personal data: in the public interest for the detection or prevention of crime; or where needed to protect your vital interests or those of another person. We may also hold and use special category data: to establish, exercise or defend a legal claim; where 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.

Sometimes we may use your personal data for purposes that are different from those for which we collected it. If we do this, we will notify you and explain our legal ground for using your data in this way, as required under the relevant data protection law.

## **Who do we share your personal data with?**

In order to fulfil the purposes mentioned above, we may share your personal data with the Multimatic Corporate Office in Canada. We will only share your personal data with third parties where we have an appropriate legal ground under data protection law which permits us to do so. Commonly, this could include situations where we are legally obligated to provide the information (e.g. to tax authorities), to comply with our contractual duties (e.g. to providers of your contractual benefits, etc.), or where it is necessary in our legitimate interest (e.g. to an IT service provider) for maintenance of our IT systems.

We remain responsible for ensuring that our processors comply with data protection law and the Data Protection Policy in their handling of personal data. We assess and apply data protection and information security measures prior to, and during, the appointment of a processor. The extent of these measures will vary depending on the nature of the activities, but will include appropriate risk assessments and reviews, as well as contractual obligations.

## **If you give us someone else's personal data**

Sometimes, you might provide us with another person's personal data – e.g. details of your emergency contact or next of kin. In such cases, we require you to inform the individual of what personal data of theirs you are giving to us. You must also give them our contact details and let them know that they should contact us if they have any questions about how we will use their personal data.

## **Consequences of not providing personal data**

We only ask you to provide personal data when we have a good reason to do so. As a result, there may be consequences if you do not provide particular information to us.

Some of the personal data you provide to us is required by law. For example, if you do not provide your national identification/insurance number or equivalent (as applicable), we will not be able to make correct tax/local insurance deductions.

We may require you to provide other personal data where it is necessary for us or our benefits providers to fulfil our contractual obligations to you, or for you to fulfil your contractual obligations to us, or where our use of the data is necessary in our legitimate interests. For example, if, as an hourly paid employee, you do not provide us with a timesheet, we cannot pay you for the hours you have worked, or if you do not complete the application form required for certain insurance coverage, we cannot provide you with that insurance coverage.

If you choose not to provide us with personal data requested, we will tell you about the consequences of your decision at the relevant time.

## **How long will we keep your personal data?**

We will not keep your personal data for longer than we need it for our legitimate purposes.

We take into account the following criteria when determining the appropriate retention period for the personal data of our employees:

- the amount, nature and sensitivity of the personal data
- the risk of harm from unauthorized use or disclosure
- the purpose for which we process your personal data, and how long we need the particular data to achieve this purpose
- how long the personal data is likely to remain accurate and up-to-date
- how long the personal data might be relevant to possible future legal claims
- any applicable legal, accounting, reporting or regulatory requirements that specify how long certain records must be kept

We will always keep your personal data for so long as we are required to do so under applicable legal, accounting, reporting or regulatory requirements. Given the variety of personal data that we use and the circumstances in which we use it, it is difficult to predict in advance how long we will keep particular items of personal data. Where possible, the Appendix to the Data Protection Policy (the Appendix) sets out the retention periods applicable to different types of personal data. These retention periods have been determined on the basis of the above criteria, and represent the longest period for which we will ordinarily keep it. We may often keep particular items of your personal data for less time. However, there may also be circumstances in which it is appropriate for us to keep particular items of your personal data for a longer period than that set out in the Appendix.

In addition, for some types of personal data, it is more appropriate to decide retention periods on a case-by-case basis (also using the criteria described above), and this is indicated in the Appendix where applicable.

We will base these retention decisions on the relevant circumstances, taking into account the criteria listed above.

## **Transferring personal data outside the EEA**

An out of country transfer of personal data takes place when the data is transmitted or sent to, viewed, accessed or otherwise used in, a different country. Data protection law restricts transfers

of personal data to countries outside of the EEA because the law in those countries might not provide the same level of protection to personal data as in the EEA. To ensure that the level of protection is not compromised, we are only able to transfer your personal data outside the EEA if certain conditions are met.

We may transfer some of your personal data to the following country outside the EEA: **Canada**. There is an adequacy decision by the European Commission in respect of Canada. This means that Canada is deemed to provide an adequate level of protection for your personal data.

## Your rights

You have a number of legal rights relating to your personal data:

- **The right to make a subject access request.** This enables you to receive certain information about how we use your personal data, as well as to receive a copy of it and to check that we are lawfully processing it.
- **The right to request that we correct incomplete or inaccurate personal data** that we hold about you.
- **The right to request that we delete or remove personal data** that we hold about you where there is no good reason for us to continue to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- **The right to object to our processing your personal data** where we are relying on our legitimate interest (or the legitimate interest of a third party) or where we cannot show a compelling reason to continue the processing
- **The right to request that we restrict our processing of your personal data.** This enables you to ask us to suspend the processing of personal data about you, for example, if you want us to establish its accuracy or the reason for processing it.
- **The right to withdraw your consent to us using your personal data.** As described above, we do not normally rely on your consent as the legal ground for using your personal data. However, if we *are* relying on your consent as the legal ground for using any of your personal data and you withdraw your consent, you also have the right to request that we delete or remove that data, if we do not have another good reason to continue using it.
- **The right to request that we transfer your personal data** to you or to another party, in a structured format. This right applies in respect of data that you have provided which is necessary for the performance of a contract or which you have consented to us using.

Note that these rights are not absolute and, in some circumstances, we may be entitled to refuse some or all of your request. If you would like to exercise any of the above rights, or if you have any questions or concerns about how your personal data is being used by us please contact the following:-

For Multimatic Ltd (including EU-Matic):-

Unit 40000  
Herald Avenue  
Coventry  
CV5 6UB  
email: [euhr@multimatic.com](mailto:euhr@multimatic.com)

For Multimatic CFT Limited:-

Gateway 11 Business Park  
Copper Smith Way  
Wymondham, Norfolk  
NR18 0WY  
email: [MCFTHR@cftech.co.uk](mailto:MCFTHR@cftech.co.uk)

For MTCE Limited (including Multimatic Niche Vehicles Europe, Multimatic Niche Products, Selective Pre-Preg (SPP) and Multimatic Motorsports Europe): -

20 Fison Way  
Thetford  
IP24 1HJ  
email: [mtcehr@multimatic.com](mailto:mtcehr@multimatic.com)

For Multimatic Marketing & Service Center GmbH:-

Amsterdamerstrasse 192  
50735 Köln  
email: [HR\\_MPSC@multimatic.com](mailto:HR_MPSC@multimatic.com)

For Multimatic Engineering Prague s.r.o.:-

Šafránková 1243/3  
Stodůlky, 155 00 Prague 5  
Czech Republic  
email: [HR\\_MEP@multimatic.com](mailto:HR_MEP@multimatic.com)

If you have any questions or concerns about how your personal data is being used by the Multimatic Corporate Office in Canada, please contact [HR@multimatic.com](mailto:HR@multimatic.com).

If you feel that your personal data has been processed in a way that does not meet the standard of the GDPR, you have a specific right to lodge a complaint with the relevant supervisory authority. The contact details for the list of supervisory authorities can be found at: [http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm). The supervisory authority will then report to you on the progress and outcome of your complaint.