# **Privacy Policy (Employee Data)**

In order to comply with contractual, statutory and management obligations and responsibilities, 360 WORLDWIDE LTD is required to process personal data relating to its employees.

360 Worldwide LTD is committed to protecting employee privacy and processing data in line with all relevant Data Protection Legislation. For the purposes of this policy the term processing includes the initial collection of personal data, and holding and use of such data, as well as access and disclosure, through to final destruction.

This policy sets out the basis on which we collect, use and disclose the personal data of our employees, as well as your rights in respect of personal data.

# What type of Personal Data do we collect?

We may collect the following types of personal data:

- Relevant contact information including your name, address, email address, telephone number and any other contact information that allow us to meet our organisational and statutory obligations to you as your employer
- Details we require to ensure payment is made in line with our contractual obligations to you, including your PPSN, bank account details, and information relating to your salary
- Right to work documentation and other security screening information
- Job-related information such as years of service, work location, holiday information and contract data
- Data that we require to ensure we fulfil our health and safety obligations as an employer including but not limited to, next-of-kin details, individual risk assessment details, personal information emergency evacuation plans and information relating to workplace accident (including but not limited to accident reports, relevant photographs, witness statements)
- Data that we require to fulfil statutory obligations including but not limited to data relating to: tax, statutory leave (including maternity leave, paternity leave, parental leave, force majeure, carer's leave); and work permits
- Data that is necessary for the organisational functioning of 360 Worldwide LTD . This includes, but is not limited to, data related to your recruitment, training and development, absence, disciplinary matters, health and safety, and security
- Sensitive personal data relating to (i) your physical or mental health, or (ii) racial/ethnic origin.
- i) Information relating to health, will be processed for the purpose of recording absence from work due to sickness, to make appropriate referrals to the Company Doctor and to make any necessary arrangements or adjustments to the workplace in the case of disability. This processing will not happen without the employee's knowledge.

ii) Information relating to racial/ethnic origin will be processed for the purpose of confirming immigration, right-to-work and residence status only. This processing will not happen without the employee's knowledge

### Disclosure to other bodies

In order to perform our contractual and management responsibilities 360 Worldwide LTD may, from time to time, need to share an employee's personal data with another body.

For the performance of the employment contract, 360 Worldwide LTD is required to transfer an employee's personal data to third parties (for example, to an external accountant who processes (COMPANY'S) payroll, and to our pension provider). In addition, from time to time, in order to ensure full compliance with National and European employment legislation, 360 Worldwide LTD may from time to time be required to share certain information with our solicitor, or another employment advisory body.

In order to fulfil our statutory responsibilities 360 Worldwide LTD is required to provide some employee personal data to government departments or agencies, or to regulatory bodies. This can include, but is not limited to, provision of salary and tax data to Revenue; or provision of information relating to workplace accidents to the Health and Safety Authority.

Where we are obliged to do so due to legal obligations, employee personal data may be shared with relevant bodies (for example Security information relevant to a criminal investigation may be shared with An Garda Síochána)

### Accuracy

We take reasonable steps to ensure that your personal information is accurate, complete and current. Please note that you have a shared responsibility with regard to the accuracy of your personal information. Please notify the CEO of any changes to your personal information, or that of your next of kin.

#### Access

You may reasonably access and update the personal information pertaining to you that is on file with 360 Worldwide LTD. You can exercise this right by contacting your line manager.

### Security

360 Worldwide LTD takes its responsibilities to secure your personal data seriously and will take all reasonable efforts to protect your information from loss, misuse, unauthorised access, disclosure, alteration and destruction. Appropriate technical and organisational measures are in place to prevent unauthorised or unlawful processing of Personal data and against accidental loss, destruction or damage to personal data.

# Retention

Your personal information will be retained as long as necessary to achieve the purpose for which it was collected, usually for the duration of any contractual relationship and for any period thereafter as legally required or permitted by applicable law.

## **Review**

This policy will be reviewed periodically and will be updated as necessary.