

This Filtronic Employee Privacy Notice together with the Filtronic Data Protection Policy replaces the existing provision(s) (if any) relating to data protection in your contract of employment and such existing provision(s) if any, are hereby deleted.

Filtronic (which includes Filtronic plc and its subsidiary companies and herein also refers to the Filtronic entity that is your employer) collects and processes personal data relating to employees to manage the employment relationship. Filtronic is committed to being transparent about how it collects data, uses that data and meets its data protection obligations.

### What information does Filtronic collect?

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

- your name, address and contact details, including email address and telephone number, date of birth and gender;
- the terms and conditions of your employment;
- details of your qualifications, skills, experience and employment history, including start and end dates with previous employers and with Filtronic;
- information about your remuneration, including entitlement to benefits such as pensions or insurance cover;
- details of your bank account and national insurance number;
- information about your marital status, next of kin, dependants and emergency contacts;
- information about your nationality and entitlement to work in the UK;
- information about your criminal record (where relevant);
- details of your schedule (days of work and working hours) and attendance at work;
- details of periods of leave taken by you including holiday, sickness absence, family leave and the reasons for the leave;
- details of any disciplinary or grievance procedures in which you have been involved including any warnings issued to you and related correspondence;
- assessments of your performance including appraisals, performance reviews and ratings, training you have participated in, performance improvement plans and related correspondence;
- information about medical or health conditions including whether or not you have a disability for which Filtronic needs to make reasonable adjustments;
- your driving licence and details of any endorsements; and
- equal opportunities monitoring information including information about your ethnic origin.

Filtronic collects this information in a variety of ways. For example, data is collected through application forms, curriculum vitae, passports or other identity documents such as your driving licence, forms completed by you at the start of or during employment, correspondence with you, or through interviews, meetings or other assessments.

In some cases, Filtronic collects personal data about you from third parties such as references supplied by former employers. Third party data collection is only sought with your consent.

Data is stored in a range of different places including your personnel file in Filtronic's HR management system and other IT systems such as Filtronic's email system.

### Why does Filtronic process personal data?

Filtronic needs to process data to enter into 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, pension and insurance entitlements etc.



In some cases, Filtronic 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 which they are entitled.

In other cases, Filtronic has a legitimate interest in processing personal data before, during and after the end of the employment relationship. Processing employee data allows Filtronic to:

- run recruitment and promotion processes;
- 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;
- operate and keep a record of disciplinary and grievance processes to ensure acceptable conduct within the workplace;
- operate and keep a record of employee performance and related processes to plan for career development, succession planning and workforce management purposes;
- 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;
- 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;
- operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave) to allow effective workforce management, ensure that Filtronic complies with duties in relation to leave entitlement and ensure that employees are receiving the pay or other benefits to which they are entitled;
- ensure effective general HR, pension and business administration purposes;
- provide references on request for current or former employees;
- respond to and defend against legal claims; and
- maintain and promote equality in the workplace.

Some special categories of personal data, such as information about health or medical conditions is processed to carry out employment law obligations (such as those in relation to employees with disabilities and for health and safety purposes).

Where Filtronic processes other special categories of personal data such as information about ethnic origin, sexual orientation, health, religion or belief, this is done for the purposes of equal opportunities monitoring. Data that Filtronic uses for these purposes is anonymised or is collected with the express consent of employees which can be withdrawn at any time. Employees are entirely free to decide whether or not to provide such data and there are no consequences for choosing not to do so.

#### Who has access to data?

Your information will be shared internally with members of HR, your line manager, managers in the business areas in which you work and IT and finance staff if access to the data is necessary for performance of their roles.

Filtronic shares your data with third parties in order to obtain pre-employment references from other employers and obtain necessary criminal records checks from the Disclosure and Barring Service (if applicable to the role). Filtronic may also share your data with third parties in the context of a sale of some or all of its business. In those circumstances the data will be subject to confidentiality arrangements.

Filtronic also shares your data with third parties that process data on its behalf, in connection with payroll, the provision of benefits and occupational health services, pensions, Save as You Earn (SAYE) scheme, other share plans and medical insurance.



### How does Filtronic protect data?

Filtronic takes the security of your data seriously. Filtronic 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. Further details of IT security arrangements may be obtained from the IT department, and from Filtronic Group Policies section on Filtronic website

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

### For how long does Filtronic keep data?

Filtronic 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:

HR/Personnel/Finance - seven years post-employment

### Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require Filtronic to change incorrect or incomplete data;
- require Filtronic to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where Filtronic is relying on its legitimate interests as the legal ground for processing; and
- ask Filtronic to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override Filtronic's legitimate grounds for processing data.

If you would like to exercise any of these rights, please e-mail: [datasubjectaccessrequests@filtronic.com](mailto:datasubjectaccessrequests@filtronic.com)

If you believe that Filtronic has not complied with your data protection rights, you can complain to the Information Commissioner.

### What if you do not provide personal data?

You have some obligations under your employment contract to provide Filtronic with data. In particular, 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 good faith. You may also have to provide Filtronic with data in order to exercise your statutory rights, such as in relation to statutory leave entitlements. 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, have to be provided to enable Filtronic to enter a contract of employment with you. If you do not provide other information, this will hinder Filtronic's ability to administer the rights and obligations arising as a result of the employment relationship efficiently.

