

Privacy Notice for Contractors

May 2018

This Filtronic Contractor Privacy Notice together with the Filtronic Data Protection Policy replaces the existing provision(s) (if any) relating to data protection in your contract for services with Filtronic 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 has engaged you) collects and processes personal data relating to Contractors (which herein includes, consultants, agents, workers, and other parties providing services to Filtronic not being an employee of any member of the Filtronic Group) to manage the contractual relationship. Filtronic is committed to being transparent about how it collects data, uses that data and meets its data protection obligations.

What information does the 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;
- the terms and conditions of your engagement;
- details of your qualifications, skills, experience (where relevant);
- information about your fees (or other remuneration);
- details of your bank account and national insurance number (where relevant);
- information about your nationality and entitlement to carry on business or work in the UK (where relevant);
- information about your criminal record (where relevant);
- details of your schedule (days of work and working hours) if relevant;
- assessments of performance as Contractor;
- information about medical or health conditions including whether or not you have a disability for which Filtronic needs to make reasonable adjustments.

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

In some cases, the Filtronic may collect personal data about you from third parties such as references supplied by other companies for which you have provided services. Third party data collection is only sought with your consent.

Data is stored in a range of different places including your contract file in Filtronic's Legal Department and or HR management and payroll systems and other IT systems such as the Filtronic's email system.

Why does the Filtronic process personal data?

The Filtronic needs to process data to enter into a contract with you and to meet its obligations under your contract as well as comply with the law. For example, it needs to process your data to pay you in accordance with the agreed terms in your contract. It will occasionally conduct reasonable due diligence checks in respect of money laundering and compliance with anti-bribery and corruption legislation.

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 a Contractor's entitlement to work in the UK, to deduct tax and to comply with health and safety laws.



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

- run recruitment and promotion processes;
- maintain accurate and up-to-date engagement records and contact details including details of who to contact in the event of an emergency;
- operate and keep a record of Contractor performance;
- ensure effective business administration purposes;
- provide references on request for current or former Contractors;
- 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 engagement law obligations (such as those in relation to Contractors with disabilities and for health and safety purposes).

Where the 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 the Filtronic uses for these purposes is anonymised or is collected with the express consent of Contractors which can be withdrawn at any time. Contractors are entirely free to decide whether or not to provide such data and there are no consequences of failing to do so.

Who has access to data?

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

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 Contractors 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 the Filtronic website.

For how long does Filtronic keep data?

Filtronic will hold your personal data for the duration of your engagement. The periods for which your data is held after the end of engagement are:

Legal/Business/Finance - seven years post-engagement

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



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• 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.

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 engagement contract to provide Filtronic with data. 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 engagement 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 engagement.