

# **Employee Fair Processing Notice/ Data Privacy Notice**

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## Introduction

RWS is committed to respecting your privacy. This Fair Processing Notice (FPN) explains the processing of the personal data of people who apply to work and work with RWS companies in the **RWS Group**. A full list of the relevant companies appears at [RWS Companies](#). In the list you will find details of the companies that employ staff in your country. Where more than one company is listed, please refer to your employment contract to identify which company employs you, and if in doubt, ask your local Human Resources (HR) representative. For all contractors, applicants, interview candidates, interns, agency workers and consultants, please ask your contact to confirm which company is processing your application. Throughout this notice we will simply refer to “**RWS**”, which will mean the company relevant to you. For each member of staff the data controller will be the company that employs you and for directors it is the company of which you are a director. In addition, **RWS Holdings PLC** will perform functions of the head of the RWS group of companies. When performing such functions, **RWS Holdings PLC** will be a joint data controller of the personal data of employees of **RWS group companies**. **Within the RWS group, various companies perform inter-group functions as a data processor on behalf of the company that employs you.**

All personal data that we obtain about you will be used in accordance with the current data protection law applicable to you and this FPN. We need to collect and process personal data in order to perform your employment contract, to comply with legal obligations and for our legitimate interests to operate our business.

This FPN explains the types of personal data that we collect from you and the processing the RWS companies will perform. It sets out your rights and RWS’s obligations. We appreciate that there are variations in data protection law. Therefore, in the event that the local law applicable to you provides you with greater rights than provided in this FPN, the local law will prevail.

Please check Schedule 1 to this Notice for a list of countries that have separate Data Processing Agreements or variations to this FPN.

This FPN describes:

- The categories of personal data that we may process
- How your personal data is processed
- For what purposes we process your data
- How your privacy is safeguarded during the course of our relationship with you

This notice does not form part of your employment contract.

## Definitions

- **Personal data** means any data that can identify you directly or indirectly, whether by itself or when combined with other data, regardless of the format or media on which the data are stored. More explanation is provided in detail below.
- **Processing** means any activity relating to your personal data including collection, use, alteration, storage, disclosure and destruction.
- **Company, RWS, we, us** and **our** means the company that employs you, engages you or which you deal with as a job applicant, and in certain circumstances, **RWS Holdings PLC** and our associated companies.
- **You** or **your** means current and former employees, contractors, freelancers, applicants, interview candidates, interns, agency workers, consultants and directors.
- **Employment** also includes other engagements or work relationships.

## Changes to this notice

RWS may update this notice at any time and may provide you with further notices on specific occasions where we collect and process personal data about you. You should check this notice regularly to take notice of any changes, however, where any change affects your rights and interests, we will make sure we bring this to your attention and clearly explain what this means for you.

## How we collect data about you

We may collect your personal data in a number of ways, including:

- Personal data provided by you when you apply for a job at RWS
- Personal data provided by you when you start employment at RWS
- Personal data provided by you when you communicate with any of the corporate functions at RWS (including HR, IT, Finance) provided electronically, in writing, or verbally (for example, when you contact us or any HR team members to make an enquiry or raise a concern)
- Personal data collected from or observed about you in the course of your employment
- Personal data collected from third parties such as referees, screening agencies or benefit providers about you. If this is necessary, you will be informed at the time and the third party identified.

## Types of personal data processed

Personal data RWS may process includes:

- Personal details (including name, gender, nationality, date of birth, marital/family status)
- Contact information (including home address, phone numbers and personal email addresses)
- Data related to your engagement with previous employers and the Company
- Pay and benefits data (including salary, expenses, earnings, deductions)
- Right to work information (including visas, passports and immigration details)
- Photographs of your information provided as part of your employment application or created during the application process (e.g. interview notes)
- Financial information (including bank details, social security and tax numbers)
- Attendance information (for medical and other types of leave and vacation)
- Performance management data (including records of time worked)
- Information provided in relation to grievances, flexible working requests, appeals and complaints
- References
- Disciplinary information
- Information necessary for, or discovered during, any investigations into possible or actual fraudulent or illegal activity
- Training and development data (e.g. training received)
- Health and safety data (e.g. accident reports, risk assessments)
- Monitoring data to the extent permitted by applicable laws (e.g. closed-circuit television footage, system and building login and access records, download and print records, call or meeting recordings, data caught by IT security and filters)
- Background screening data for specific job positions or customer engagements with relevant responsibilities in accordance with applicable law
- Any other legitimate personal data relating to your employment

We may also need to collect, or you may voluntarily choose to provide us with, the following special categories of sensitive personal data:

- Information revealing your race or ethnicity, religious beliefs, sex life or sexual orientation (whether or not indicated by your gender or gender identity) and political opinions

- Information about your health, including any disability or medical condition and dietary requirements
- Information about criminal convictions or offenses

Such sensitive data will only be collected in accordance with the statutory law or where appropriate subject to your consent.

These special categories of personal data require us to take additional steps to ensure their security and confidentiality. We will refer to both types of data as personal data unless we specifically refer to special data. Ordinarily, if we have to specifically collect any of this sensitive data, you will be informed and the purpose for which the data is required explained. When you provide some personal data, it is possible that details of your sensitive data may be revealed, such as your race, ethnicity, etc.

## Personal data provided by you about others

Apart from personal data relating to you, you may also provide the Company with personal data of third parties, notably your dependents and other family members, for purposes of HR administration and management, including the administration of benefits and someone to contact in an emergency. Before you provide such third party personal data of people over 18 years old to the Company, you must first inform these third parties of any such data that you intend to provide to the Company and of the processing to be carried out by the Company as detailed in this FPN. This is particularly important if you notify RWS of health details of any person; you must have that person's consent to RWS knowing the information.

## How RWS uses personal data about you

As your employer, or potential employer, acting in the course of the employment relationship, RWS may process personal data about you for the following purposes:

### As necessary, to perform your employment contract

Processing is necessary to perform the contract between you and the Company, including but not limited to:

- To make an appropriate employment offer to you and administer your employment contract if you join us
- HR administration, including maintaining your record in our HR system for integrity and security of data, ensuring information remains up to date and deleting information when it is no longer required
- To provide and administer the payments and benefits we have agreed to provide to you as part of your employment contract, including those relating to absence or incapacity
- Access controls to facilitate access to appropriate locations and systems

- To provide basic employment details for the purposes of references, which could be after your employment has ended

### As necessary, to comply with a legal obligation

Including but not limited to:

- HR administration and processing is needed for compliance with employment laws, health and safety laws, data protection laws and other regulatory laws.
- In cases where we need to ensure equality of opportunity or treatment between people of different racial or ethnic origins, holding different religious or philosophical beliefs, people with different states of physical or mental health or people with different sexual orientations with a view to enabling such equality to be promoted or maintained.
- Establish the right to work in the country in which you are employed.
- Comply with the requirements of the tax authorities in relation to tax and social security of payments or benefits to you.
- To enforce policies and procedures for employees' attendance, behavior and performance.
- To avoid unlawful dismissal.
- In cases of litigation or regulatory matters to ensure that the Company's legal rights and interests are managed appropriately, to protect the Company's reputation and to protect the Company from other damage or loss.
- In cases where there is a legal obligation to disclose information or a court or other legal order to provide information is in place.
- In cases of commercial transactions where the Company is subject to comply with automatic transfer rules.
- To comply with statutory Company reporting obligations and corporate governance requirements, such as preparation of management information reports, financial accounts and other reports in relation to HR metrics, such as retention or attendance, reporting for internal and external governance and liaising with third parties, such as investors or finance providers.
- To comply with legal obligations on employee relations or safety.
- Security monitoring and preventing and detecting inappropriate or unlawful activities to comply with health and safety laws, our duty of care and regulatory laws.

### As necessary, for our legitimate interests

RWS considers the activities listed below are necessary purposes for the processing of personal data to enable RWS to conduct its legitimate business interests as an employer and provider of technology and services to customers. These activities are not considered detrimental to the

interests or fundamental rights and freedoms of employees, contractors, applicants, interview candidates, interns, agency workers or consultants.

Including but not limited to:

- Business information protection
- Allocating and managing work
- Carrying out commitments to clients
- Communications with prospective and existing clients
- Performance and talent management
- Training, development and succession planning
- Employee engagement
- Operating company policies and procedures and network protection, safety and security monitoring and preventing and detecting inappropriate or unlawful activities
- Business development and stakeholder management
- Communication and public relations
- Mergers and acquisitions, both RWS acquiring businesses or being acquired, whereupon RWS will enter into an appropriate Joint Data Protection Agreement with the relevant other party to ensure personal data is used to consider and implement restructuring and conduct the business of the newly structured group of companies thereafter.

#### Additional legal basis, we rely on where we process special category data

- Consent that we ask you to explicitly provide for specific purposes.
- Employment law, social security and social protection law to the extent permissible under applicable laws
- Preventive or occupational medicine, for the assessment of your working capacity, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services to the extent permitted by applicable laws.
- Where you have made the special data public.
- Protect your vital interests or those of another person when you are physically or legally incapable of giving consent (for example, in exceptional emergency situations, such as a medical emergency).
- Exercise or defense of legal claims.

## The purposes we use special category personal data for

The purposes for which RWS processes special category data are necessary for performance of RWS's legal obligations as an employer under the contract of employment. These specific purposes are now explained:

### Work permits, details of residency, proof of citizenship

- Requirement to check that you are legally permitted to work in your jurisdiction.

### Racial or ethnic origin, religion, philosophical or political belief, sexual orientation or disability status

- In particular, compliance with anti-discrimination legislation.

### Health and medical

- To the extent that this data is managed by our occupational health advisers, this processing is necessary for the purposes of preventive or occupational medicine, for the assessment of your working capacity, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services, to the extent permitted by applicable laws.
- Management of time off for sickness and payment of salary or equivalent.

### Details of trade union membership

- In particular, human rights laws relating to freedom of association and assembly, laws relating to the Company's interaction with Trade Union members and officials and avoiding detrimental treatment relating to Trade Union membership or activities.

### Grievance, whistleblowing, anti-bullying and harassment or similar policies and procedures or disciplinary procedures

- In particular, employment laws relating to the effective management of complaints and avoiding unlawful dismissals, anti-discrimination laws and our duty of care to staff.

### Processing data relating to criminal convictions and offenses

The lawful basis for processing criminal records information are either for preventing and detecting unlawful acts where we process the information in connection with your employment in certain departments within RWS where we consider exposure to data, including personal



data, is a high risk or the checking of criminal records is a regulatory requirement upon our customers that they require their suppliers to fulfill.

- Criminal record check may be carried out during recruitment or transfer to specific job positions with relevant responsibilities in accordance with applicable law and where appropriate subject to your consent.
- Allegation of a criminal offense or conviction arising during your relationship with the Company:
  - a. Where we have a legal or regulatory requirement to report an offense; or
  - b. Applicable laws authorize the Company to process information about the offense (e.g. in a disciplinary process) for the purpose of making decisions regarding your relationship with the Company.

In the event background screening and/or a criminal record check is required for a specific job position, this will only be performed in accordance with the applicable law. You will be informed and where appropriate asked to consent.

## Disclosures of personal data

We will share your personal information for the above purposes as relevant and necessary. Your personal information may be:

- Accessed by or may be disclosed internally on a need to know basis to:
  - Local, regional and global Human Resources
  - Local, regional and executive management responsible for managing or making decisions in connection with your relationship with the Company (Compliance, Legal, Employee Relations and Information Security)
  - System administrators
  - Finance and IT Department and the Global HR information systems support team
- Certain basic personal data may also be accessible to other employees (limited to your name, location, job title, contact information, employee number and any published skills and experience profiles).
- Shared with third parties with whom we work together (including without limitation Sage People, Concur and Benefit Providers).
- Personal data will also be shared with certain interconnecting systems, such as the main HR system and local payroll and benefits systems. Data contained in such systems may be accessible by providers of those systems, their associated companies and sub-contractors.
- Data will be shared with tax authorities, regulatory authorities, the Company's insurers, bankers, IT administrators, lawyers, auditors, investors, consultants and other

professional advisors, payroll providers, and administrators of the Company's benefits programs.

- We may share personal data with national or international authorities in order to comply with a legal obligation to which we are subject.
- Your personal data will be disclosed to clients and other organizations with which RWS interacts in the course of our business. At the heart of any business is its people and their names, roles, contact details, and in some cases, qualifications, which may be shared with customers and other trade organizations as part of doing business.
- If RWS sells any business or assets, we may disclose your Personal Data to the prospective buyer of such business or assets and disclosure will take place as required due to local legislation and your Personal Data will be one of the transferred assets.

## Transfers of personal data

- Your personal data may be transferred to countries outside of the country in which you work or outside of the EEA to countries whose data protection laws may be less stringent than yours.
- These transfers may be to other companies in the RWS group or to third party companies outside the group providing services to the RWS group.
- The Company will ensure that appropriate or suitable safeguards are in place to protect your personal information and the transfer of your personal information is in compliance with applicable data protection laws.
- For personal data transfers between our offices, both inside and outside the EEA, an Inter-Group Data Processing Agreement is in place including the EU Standard Contractual Clauses as appropriate.
- For personal data transfers to our offices based in United States (US), we have adopted an additional transfer mechanism, the EU-US Data Privacy Framework Program whereby RWS Group US corporations RWS Life Sciences Inc. and SDL Inc. (and its US subsidiary) have self-certified to the US Department of Commerce their adherence to the EU-US Data Privacy Framework Principles.
- SDL Inc and RWS Life Sciences SDL commit when processing your personal information to comply with the Data Privacy Framework Principles (e.g., Principles of notice, choice, accountability for onward transfers, security, data integrity and purpose limitation, access and recourse, enforcement and liability).
- SDL Inc and RWS Life Sciences Inc also comply with the UK Extension to the EU-US Data Privacy Framework which applies to personal data transferred from the United Kingdom (and Gibraltar) to the US.
- To view each of our Notices relating to the transfer and processing of personal data from the EU and UK to the US, please visit: [United States Data Privacy Framework \(DPF\) program - RWS](#)

- There are specific HR policies for our US entities, please contact [NASA HR](#) for the relevant policies.
- If you require more information on the mechanisms for transfer of your data, please contact [privacy@rws.com](mailto:privacy@rws.com).

## How RWS keeps your personal data secure

RWS has put in place appropriate technical and organizational security measures to prevent your personal data from being accidentally lost, used or accessed in any unauthorized way, or altered or disclosed. In addition, RWS limits access to your personal data to the persons and organizations described above who have a need to access it. In any case, RWS will ensure that any person or organization that has access to your personal data is subject to a strict duty of confidentiality. For further information on security generally, visit the RWS Information Security page on the hub.

RWS has also put in place procedures to deal with any suspected personal data security breach and will notify you and any applicable regulator within the time periods in applicable law of a suspected or an actual breach where legally required to do so.

## How long RWS will retain your personal data

RWS must only retain your personal data for as long as necessary to fulfill the purposes for which it was collected and to satisfy any legal, regulatory, accounting or reporting requirements.

Specific retention periods are applied to each category of personal data that we may process about you. In setting these retention periods, the Company has taken into account:

- The nature, sensitivity and volume of the personal data
- The potential risk of harm to you arising from the Company's continued retention of the personal data
- The purposes for which the Company may process your personal data
- Whether the Company is required to retain any personal data by law or in accordance with its legitimate interests

## Your RWS email address

RWS recognizes that in many countries your RWS email address qualifies as personal data. However, RWS retains ownership of the email address. RWS allocates you an email address which remains active during your employment or engagement. When you cease employment or engagement with RWS your email address will be deactivated but retained in our records for so long as necessary for archive and technical purposes.

## Your rights as a data subject

The company that employs you is the data controller of your personal data and responsible for all processing of the data.

For all contractors, applicants, interview candidates, interns, agency workers and consultants, please ask your recruitment contact to confirm which company is processing your application.

However, **RWS Holdings PLC** when acting as a joint data controller of the personal data of employees, is solely responsible for all personal data processing it undertakes.

You are in control of the personal data RWS processes and you have a number of rights under the data protection laws in relation to the way we process your personal data. You can:

- Request confirmation that your personal data is being processed and a copy of the personal data being processed. RWS will respond to any request to the extent required by law and may charge a reasonable fee as provided by applicable law (we will not charge for a first request, but reserve the right as allowed under applicable law to charge for the reasonable costs of processing further requests).
- Obtain rectification of any inaccurate personal data.
- Obtain the erasure of any personal data as provided by applicable law and RWS will erase unless required or entitled to preserve the personal data.
- Request RWS to temporarily restrict its processing of your personal data while we are investigating a complaint you have.
- Withdraw your consent where we have relied upon your consent to process your personal data or object to processing by RWS as provided by applicable law.
- In certain circumstances, limited to certain types of data, request the portability of your data.

Your right to object to processing is balanced by RWS's obligations to process your data for legal reasons or compelling legitimate grounds. Each request will be considered on an individual basis.

The accuracy of the information that we hold about you is important to us. However, it is your responsibility to update us should your personal details (such as name, address, bank details) change.

## Contacts

If you have any questions about how your personal information is used, or wish to exercise any of your rights please:

If you are an employee, consultant, intern or agency worker:

1. Contact your local HR contact. If this does not resolve the matter, then:
2. Contact either the [Data Protection Officer \(or equivalent\) if appointed in your country or](#) RWS's Global Head of Privacy at [privacy@rws.com](mailto:privacy@rws.com). Please see the [List of Companies](#) for details of appointed Data Protection Officers.

If you are an applicant or interview candidate:

1. Contact your local recruitment contact. If this does not resolve the matter, then:
2. Contact either the [Data Protection Officer \(or equivalent\) if appointed in your country or](#) RWS's Global Head of Privacy at [privacy@rws.com](mailto:privacy@rws.com). Please see the [List of Companies](#) for details of appointed Data Protection Officers.

You also have the right to lodge a complaint with the supervisory authority in your country. Their contact details can be found at: [List of Companies and Contact Details](#)

## Schedule 1

For the following countries, this FPN is translated and published in the local language:

China

Czech Republic

France

Germany

Italy

Japan

Malaysia

Poland

Portugal

Russia

Slovenia

Spain

Ukraine

In the event of any conflict between the translated version and the English language version of the FPN, the English language version shall prevail, subject to local law.

China

Please refer to the Privacy Agreement attached to your Employment Agreement. This contains the details required for our personnel employed in China.

Romania

Please refer to the Information Note in Annex 1 of your Employment Agreement, which is the document that sets out the details of how your personal data is processed.

United States of America

Please refer to the US Employee Handbook, which is the document that sets out the details of how your personal data is processed and how you must handle personal data.

#### About RWS

RWS Holdings plc is the world's leading provider of technology-enabled language, content management and intellectual property services. We help our clients to connect with and bring new ideas to people globally by communicating business critical content at scale and enabling the protection and realization of their innovations.

Our vision is to help organizations interact effectively with people anywhere in the world by solving their language, content and market access challenges through our collective global intelligence, deep expertise, and smart technology.

Clients include 90 of the globe's top 100 brands, the top 10 pharmaceutical companies and approximately half of the top 20 patent filers worldwide. Our client base spans Europe, Asia Pacific, and North and South America across the technology, pharmaceutical, medical, legal, chemical, automotive, government and telecommunications sectors, which we serve from offices across five continents.

Founded in 1958, RWS is headquartered in the UK and publicly listed on AIM, the London Stock Exchange regulated market (RWS.L).

For further information, please visit: [www.rws.com](http://www.rws.com)

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