

IKO PLC

Data Protection Policy

We issue this policy with the aim to inform you how we use (“process”) the personal data we collect from our employees.

Personal Data Definition

Personal data is information relating to an identified or identifiable person.

In the context of the employment of the Employee by the Employer, the Employer will collect and process certain personal data relating to the Employee, such as:

- Identification data (name, first name, address);
- personal details (date and date of birth, marital status, language,
- nationality, gender);
- education (studies, capability, professional experience,...);
- appraisals;
- financial data (salary, incentives, bank account number);
- characteristics specific to the management of contractual benefits;
- absences;
- photos and possible video footage of the Employee;
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As a general rule we will not process “sensitive” personal data, unless we have a legal need to process it for which we will ask your prior consent. Sensitive personal data means personal data consisting of information as to the racial or ethical origin of a person, political opinion, religious or philosophical belief, membership to a trade union, etc.

Legislation applicable

IKO PLC

Data Protection Policy

As an employer, IKO must process Personal Data in accordance with the applicable data protection laws and regulations, including the EU General Data Protection Regulation 2016/679 effective as from 25 May 2018 and its national implementation legislation, as well as national labour law provisions and applying collective labour agreements.

Processing Personal Data

The Personal Data will be processed by or on behalf of the Employer:

- in order to comply with legal obligations to which the Employer is subject,
- when such processing is necessary for the execution of the Employment Agreement or any other agreement to which the Employee is party (such as any remuneration or incentive scheme the employee participates in); or
- when such processing is necessary to uphold the legitimate interests of the Employer (for example, for internal control, safeguarding the health and safety of job applicants and employees, for business continuity or to protect the Employer's business) or a third party to whom the Personal Data are provided (for example, to other group companies).

Personal Data is linked to certain activities

The personal data that will be processed relate to the following activities and serve the following purposes:

- Staff administration, including wage administration, contractual

IKO PLC

Data Protection Policy

benefits, reimbursement of costs;

- Management of the staff and execution of staff policies, including the evaluation of staff, planning of education, career development;
- Compliance with statutory, regulatory or administrative obligations and observance and application of social and tax legislation;
- The work planning, both organizational and administrative, also in order to manage services rendered to clients and to charge clients;
- Management of access control, telephone and IT-network;
- Management of social benefits organized by the Employer to the benefit of the employees;
- Ensuring and maintaining an open communication between the company and its staff ;
- Production of statistics; and
- The support, both on an organizational and administrative level, of the recruitment process and application procedure.

The Employer may share certain Personal Data with third parties, such as a group company of the Employer, insurers, pension schemes providers, banks, payroll service providers, possible acquirers of (a part of) the business of the Employer and trusted advisors. These parties may be located in countries outside the European Economic Area, which countries may offer a lower level of data protection than the country in which the Employee resides. In such case, the Employer shall ensure that the international transfer of the Personal Data shall comply with the applicable data protection laws.

Personal Data Storage

In line with data protection principles, we only keep your data for as long as

IKO PLC

Data Protection Policy

we need it for, which will be at least for the duration of your employment with us though in some cases we will keep your data for a period of 6 years after your employment has ended. Data relating to pension will be retained in accordance with the limitation periods as determined by the Pensions Act. Medical records will be retained in accordance with The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 and hazardous substance legislation.

The Employer will take the necessary administrative, technical and organizational measures to ensure an adequate level of protection of the Personal Data, in accordance with the specific identified risks. The Employer shall protect the Personal Data of the Employee against destruction, loss, modification or unauthorized communication of or access to transmitted, stored or otherwise processed Personal Data, either purposefully or by accident.

Employee's right regarding Personal Data

The Employee can contact the M.D. and/or H.R. team to exercise his/her rights under the applicable data protection laws, to the extent these are applicable, namely:

- The right of access to his/her personal data;
- The right of rectification and/or erasure;
- The right to restriction of data processing;
- The right to object to the processing of his/her data; and
- The right to data portability.

IKO PLC

Data Protection Policy



These rights have to be exercised within the limits of the applicable legislation and regulations on data protection.

Within the same limits the employee has the right to file a complaint with the appropriate Data Protection Authority, the ICO.

Approved by: Managing Director

Policy 020

A handwritten signature in black ink, appearing to read 'A Carlyle'.

Print name: Anthony Carlyle

Effective:

August

2018

Date: 20/08/18