

EMPLOYEE PRIVACY NOTICE

The purpose of this Notice is to explain how we handle personal data about our permanent and temporary employees, whether full time or part time, any third party personnel such as contractors and consultants in an employment context, students and assignees, and beneficiaries/dependents of current and former personnel. This Notice will also explain the rights that such employees and personnel have under data protection law. In this Notice, we refer to this type of information as “**Employment Data**”.

IRIS is referred to in this Notice as “**we**”, “**us**” or “**our**”.

1. WHAT EMPLOYMENT DATA DO WE COLLECT?

We collect various types of Employment Data about you. This may include the following categories of information, to the extent permitted by applicable law:

- **Contact details**, such as your address, telephone number and email address, etc and contact details of others that you provide, such as who to contact in the event of an emergency, details of your dependents, life assurance beneficiaries etc.
- **Financial information** relating to your compensation, benefits and pension arrangements (if applicable), such as details of your salary and any deductions, bank account, tax codes, national insurance number (or the local equivalent), corporate credit card usage, employment benefits, travel expenses, etc.
- **Recruitment information**, such as your CV/resume, notes of interviews, application forms, decisions to offer employment, background information and third party references (if recorded), criminal records check file (if applicable), and psychometric test results (if applicable) etc.
- **Employment Administration and Career information**, such as employment and career history, photograph, absence and attendance records (including hours worked), health and safety records, gender, age, sickness records, accident reports, performance information (including any appraisals, performance reviews, or other internal communication regarding performance), grievance or disciplinary records, skills and experience records, training profile and records, records of projects you have worked on, termination details etc.
- **Location Information** (where such information is legally permitted to be collected), such as where recorded by electronic card access systems.
- **Asset use information**, such as information about your use of our computers and phones, etc (where such information is legally permitted to be collected).



- Information that may **reveal race or ethnic origin, religious or philosophical beliefs**, or information that concerns **health**, for example to identify or keep under review the existence or absence of diversity and inclusion (where permitted and in accordance with applicable law).
- **Other information** which you voluntarily provide in the course of employment that it is necessary to hold or use for our business purposes. For example, where you register an interest in a particular sport or activity we run for our staff.

2. HOW DO WE OBTAIN EMPLOYMENT DATA?

Typically, we receive Employment Data in several ways:

- **Directly from you:** For instance when you first apply for employment, when you use self-service updates (e.g. on the online HR self-service system in use in your territory, where applicable) or if you otherwise notify us of a change in personal circumstances.
- **Indirectly from you:** For instance when you complete certain transactions which are logged for our purposes (e.g. when you attend an internal training course or make a staff travel booking).
- **From third parties:** For instance, recruitment agencies, or government agencies.

3. WHAT WILL WE DO WITH YOUR EMPLOYMENT DATA?

The purposes for which we use your Employment Data include:

- **Workforce Planning and Recruitment**, for example business forecasting, employee assignment planning and budgeting, interviewing, selecting and hiring staff.
- **General Human Resources Management and Administration**, for example employee career development, performance management, disciplinary and grievance management, compensation and benefits management and benchmarking, administering payroll and benefit arrangements, obtaining management and employee satisfaction feedback, managing absences (e.g. sickness, parental leave and other family related and flexible working policies), general headcount reporting, disaster recovery and emergency response planning, and equal opportunities monitoring.
- **Performance of our Business Operations**, for example carrying out day to day business activities, allowing us to work together and collaborate, providing services to our customers and ensuring business continuity.



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A CANON COMPANY

- **Security Management**, for example to ensure the security of our premises (e.g. CCTV), assets, information, employees and other personnel.
- **Marketing, Advertising and Public Relations**, for example, with your permission, displaying employees' and personnel's contact details and photographs on our website, or other professional social media websites and on other means of communication such as press releases, blogs, awards and website press releases.
- **Ensuring compliance with our Code of Conduct**, to ensure that we are living up to our values.
- **Legal and Regulatory Compliance**, for example to ensure compliance with health & safety requirements and other legal or fiscal obligations, or in connection with litigation or an internal investigation or audit and to ensure compliance with our policies regarding anti-money laundering, bribery and corruption.

We will only process your Employment Data where we have a legal basis for doing so. Our processing of Employment Data is generally because it is necessary for us to do so in connection with your employment contract. In addition, certain processing may be based on your consent (which you have the right to withdraw), or because it is necessary to comply with a legal obligation or to enable us to pursue our legitimate business interests (e.g. when you sign up to a Canon social event or register for training session given by an external firm).

Where you provide us with Employee Data about someone other than yourself (e.g. a dependent), you must obtain their consent before doing so.

Email Monitoring

Where permitted and in accordance with the Canon ICT Equipment Usage Policy and applicable law, we may monitor emails sent to and from our employees and other personnel and/or your use of other Canon ICT assets and accounts. The information such emails contain (which may include personal data relating to third parties) may be used when investigating incidents. Although we endeavour not to review the contents of personal emails, there may be occasions in which this is necessary, for example, to investigate a breach of security or to investigate a disciplinary matter.

4. WHO IS YOUR EMPLOYMENT DATA SHARED WITH?

(A) WITHIN CANON

We restrict access to Employment Data to people within the firm who have a "need to know" such information, including HR, works councils (where applicable) and health and safety committees (where applicable). For example, your manager will have access to certain of your Employment Data for career development purposes and performance management.



(B) OUTSIDE CANON

We share Employment Data with authorised third party service providers, such as compensation and benefits providers, pension providers, health or retirement plan providers, or workplace security and safety providers that have a “need to know” such information for the purposes described above, as well as other third parties outside our group of companies. Generally, we will only disclose your Employment Data to our suppliers and other third parties and in the following circumstances:

- when required to do so by law;
- in response to a legitimate request for assistance by the police, law enforcement or other public authority (e.g. traffic and road safety authorities to administer a fine incurred by an employee when using a company vehicle);
- to seek legal advice from our external lawyers or in connection with litigation with a third party;
- in connection with the sale, purchase or merger of a business; and/or
- to provide a third party (such as a potential supplier or customer) with a means of contacting you in the normal course of business, for example, by providing your contact details, such as your business phone number and email address.

5. HOW LONG WILL WE RETAIN YOUR EMPLOYMENT DATA?

We keep your Employment Data in accordance with our [Data Retention Policy](#).

6. WHERE DO WE STORE YOUR EMPLOYMENT DATA?

Employees and other personnel which are located in the European Economic Area (the “EEA”) and the UK should be aware that Employment Data may be transferred to, and stored at, a destination outside the EEA and the UK in countries, which have less strict, or no data protection laws, when compared to those in Europe. It may also be processed by staff or our vendors in other non-EEA jurisdictions which also have less strict or no, data protection laws.

Whenever we transfer your Employment Data outside of the EEA or the UK, we will take legally required steps to ensure that adequate safeguards are in place to protect your Employment Data and to make sure it is treated securely and in accordance with this Notice. You may contact us for a copy of the safeguards which we have put in place to protect your Employment Data and privacy rights in these circumstances.



7. EXERCISING YOUR RIGHTS

You may have the right to request access to, rectification or erasure of, the Employment Data we hold about you. You may also have the right to object to or restrict certain types of processing of your Employment Data and request to receive a machine-readable copy of the Employment Data you have provided to us. Remember that you can up-date certain information about yourself in Oracle via self-service.

Any request to exercise one of these rights will be assessed by us on a case by case basis. There may be circumstances in which we are not legally required to comply with your request or because of relevant legal exemptions provided for in applicable data protection legislation.

8. CONTACT US AND MORE INFORMATION

Please contact Human Resources if you would like to find out more about any matters relating to this Notice.

If you have concerns about the way in which we have handled your Employment Data you should contact our Data Protection Officer (Jean-Christophe Wavreille – privacy@iriscompany.com) in the first instance. If you are still dissatisfied, you have the right to complain to your Data Protection Authority; however, we encourage you to raise these issues with us first and allow us to seek resolution.

9. UPDATES TO THIS NOTICE

We may change this Notice from time to time in order to reflect changes in the law, regulatory guidance or our data privacy practices in compliance with the law. When this happens and where required by law, we will provide you with a new or an updated notice detailing how the use of your Employment Data is changing and, if necessary, obtain your consent for the further processing.

This Notice was last updated on 25th May 2018