

Tata Chemicals Europe Limited

Privacy Notice



TATA CHEMICALS EUROPE

TATA Chemicals Europe Limited: Privacy Notice for Employees, Workers and Contractors

Last Updated on 16 October 2018

TATA Chemicals Europe Limited will process personal data about you for purposes related to your employment. We are committed to protecting the privacy and security of your personal information. We will only process personal information about you in accordance with data protection principles, which are explained in our Data Protection Policy.

This Privacy Notice describes how we collect and use personal information about you during and after your working relationship with us. This Notice applies to current and former employees, apprentices, workers and contractors. This Privacy Notice does not form part of any contract of employment or other contract to provide services.

What personal information do we hold about you?

We will collect, store, and use those categories of personal information about you listed in the Schedule to this Privacy Notice.

We collect personal information about you through the application and recruitment process, either directly from you or from employment agencies. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies.

We will collect additional personal information in the course of our working relationship and you performing work for us.

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

How we will use information about you?

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information (1) where we need to perform the contract we have entered into with you; (2) where we need to comply with a legal obligation; or (3) where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

The grounds for processing will sometimes overlap and there may be several grounds which justify our use of your personal information. The situations in which we will process your personal information are listed in the Schedule to this Privacy Notice.

Sensitive personal information and criminal convictions

We may collect and process special categories of personal information (sensitive personal information as set out in the Schedule) where we need to carry out our legal obligations or exercise rights in connection with employment or otherwise where it is needed in the public interest or with your consent.



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This may include us collecting sensitive personal data (including health data) from third parties including health professionals such as your GP or consultant or occupational health advisers.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We do not generally collect data about criminal convictions. We may be notified of such information directly by you or others in the course of you working for us. We will only collect and use information about criminal convictions and offences where it is lawful.

When might we share personal information with other group companies?

We will share your personal information with other group companies for the purposes of administration and regular reporting activities, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of personal data.

TATA Chemicals Europe Limited is a subsidiary of TATA Chemicals Limited headquartered in India (which is outside of the EU). The EU does not recognise India as a country which has in place adequate laws for the purposes of protecting your personal information. Accordingly, we have put in place arrangements with relevant group companies to ensure that your personal information is treated by such companies in a way that is consistent with and which respects the EU and UK laws on data protection.

When will we share personal data with third parties?

We may need to share your personal information with certain authorities or a regulator or to otherwise comply with the law. We may also share your personal information with other third parties in the context of the performance and administration of your contract, for example, for the purposes of arranging training, employee benefits, insurance, taking advice (including medical and legal advice), compliance with reference requests or in the context of the possible sale or restructuring of the business.

We may share your personal information with third parties in relation to processing activities including for the purposes of pension administration, benefits provision and administration and IT services.

Where required for your role, your business contact details may be shared with clients, contractors and/or suppliers.

We may also need to share your personal information with a business partner, investor, assignee or transferee (actual or prospective) to facilitate business or asset transfer transactions such as merger, acquisition or asset sale involving Tata Chemicals Europe Limited and/or any of its parent companies and subsidiaries.

If we share personal data we are required to take appropriate security measures to protect your personal information. We do not allow third parties to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

How long will we retain personal information?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are available in our Data Retention Policy which can be found on the Company intranet site.



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Your legal rights

In certain circumstances, by law, you have the right to:

Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.

Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example, if you want us to establish its accuracy or the reason for processing it.

Request the transfer of your personal information to another party (in limited circumstances).

How to exercise your rights?

If you want to exercise the above rights in relation to your personal data please contact our Legal Manager, ideally, in writing, using the contact details provided below. We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights).

You will not normally need to pay a fee to exercise any of these rights. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

Contact Us

We have appointed our Legal Manager (LM) to oversee compliance with this Privacy Notice. If you have any questions about this Privacy Notice, how we handle your personal information or if you wish to make a request in relation to your rights, please contact the LM (contact details below).

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues or to seek judicial remedy.



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Changes to this Privacy Notice

We reserve the right to update this Privacy Notice at any time. The date on which it was last updated is indicated at the beginning of this Privacy Notice. We encourage you to check back periodically to make sure that you are aware of the most recent provisions.

This Privacy Notice is issued by:

TATA Chemicals Europe Limited

Natrium House

Winnington

Northwich

Cheshire

CW8 4GW

Contact Us:

Helen Pemberton

Legal Manager

hpemberton@tatachemicals.com



TATA CHEMICALS EUROPE

Schedule to Employee Privacy Notice

We will collect, store and use the following personal data about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Gender.
- Marital status and dependants.
- Next of kin and emergency contact information.
- National Insurance number.
- Bank account details, payroll records, court orders and tax status information.
- Salary, annual leave, pension and benefits information.
- Start date.
- Location of employment or workplace.
- Copy of driving licence and details of any driving penalties.
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process) and recruitment assessment processes.
- Employment records (including job titles, work history, working hours, training records and professional memberships).
- Performance information including appraisal documentation.
- Disciplinary and grievance information.
- CCTV footage and other information obtained through electronic means such as swipecard records.
- Information about your use of our information and communications systems.
- Photographs.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs and sexual orientation.
- Trade union membership.
- Information about your health, including any medical condition, health and sickness records and reports.
- Information about criminal convictions and offences.

The situations in which we will process your personal information may include:

- Making a decision about your recruitment, appointment or promotion.
- Determining the terms on which you work for us.
- Checking you are legally entitled to work in the UK.
- Paying you and, if you are an employee, deducting tax and National Insurance Contributions.
- Providing employment related benefits to you.
- Liaising with your pension provider.



TCE - Privacy Notice

- Administering the contract we have entered into with you.
- Conducting performance reviews, managing performance and determining performance requirements.
- Making decisions about salary reviews and compensation.
- Assessing qualifications for a particular job or task, including decisions about promotions.
- Gathering evidence for possible grievance or disciplinary hearings.
- Making decisions about your continued employment or engagement.
- Making arrangements for the termination of our working relationship.
- Education, training and development requirements.
- Ascertaining your fitness to work and managing sickness absence.
- Complying with health and safety obligations.
- To prevent fraud.
- To monitor your use of our information and communication systems to ensure compliance with our IT policies.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- To conduct data analytics studies to review and better understand employee retention and attrition rates.
- Equal opportunities monitoring.
- Business management and planning, including accounting and auditing.
- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work.
- Facilitating business or asset transactions such as merger, acquisition or asset sale, involving Tata Chemicals Europe Limited and/or any of its subsidiaries or parent companies.

We will use your particularly sensitive personal information in the following ways:

- We will use information relating to absence, which may include sickness absence or family related leaves, to comply with employment and other laws.
- We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

We will use trade union membership information to pay trade union premiums, register the status of a protected employee and to comply with employment law obligations.

