

Griffith Foods Europe
Global Data Privacy Notice for Staff

Issued: 18th June 2018

1. Introduction

The controller of your personal data is the Griffith Foods Europe legal entity, among the list available in the “Griffith Foods Europe Legal Entities” document, for whom you are contractually employed.

Griffith Foods has issued this Global Data Privacy Notice to describe how we handle personal data that we hold about our staff (collectively referred to as "you"). The term "staff member" includes those who work on a non-permanent basis, including contingent workers, temporary and contract workers, independent contractors, consultants, professional advisors, secondees and interns.

We respect the privacy rights of individuals and are committed to handling personal data responsibly and in accordance with the applicable law for the protection of personal data, in particular Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC ("GDPR"), as well as any applicable national acts and provisions executing the GDPR (hereinafter "Applicable Data Protection Law"). This Notice sets out the personal data that we collect and process about you, the purposes of the processing and the rights that you have in connection with it.

If you are in any doubt regarding the applicable standards, or have any comments or questions about this Notice, please contact us at the contact details in Section 10 below.

2. Types of personal data we collect

In the course of your employment at Griffith Foods we may process personal data about you and your dependents, beneficiaries and other individuals whose personal data has been provided to us.

The types of personal data we may process include, but are not limited to:

- Identification data – such as your name, gender, photograph, date of birth, staff member IDs.
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- Contact details – such as home and business address, telephone/email addresses, emergency contact details.
- Employment details – such as job title/position, office location, employment contract, performance and disciplinary records, grievance procedures, sickness/holiday records.
- Background information – such as academic/professional qualifications, education, CV.
- National identifiers – such as national ID/passport, immigration/visa status, social security numbers (US only).
- Spouse & dependents information, marital status.
- Financial information – such as banking details, tax information, withholdings, salary, benefits, expenses, company allowances, stock and equity grants.
- CCTV Footage.

If you are a contingent worker, the type of personal data we process is limited to that needed to manage your particular work assignment with Griffith Foods.

Special categories of personal data includes any personal data that reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic data, biometric data for the purposes of unique identification, trade union membership, or information about your health/sex life or sexual orientation ("**Special Categories of Personal Data** "). As a general rule, we try not to collect or process any Special Categories of Personal Data about you, unless authorized by law or where necessary to comply with applicable laws. If we do process sensitive personal data Griffith Foods will put additional measures in place to ensure the security of such personal data

In some circumstances, we may need to collect, or request on a voluntary disclosure basis, some Special Categories of Personal Data for legitimate employment-related purposes: for example, information about your racial/ethnic origin, gender and disabilities for the purposes of equal opportunities monitoring, to comply with anti-discrimination laws and for government reporting obligations.

3. Purposes for processing personal data

(ii) Employment or work-related purposes

Once you become a staff member at Griffith Foods, we collect and use your personal data for the purpose of managing our employment or working relationship with you – for example, your employment records and contract information (so we can manage our employment relationship with you), your bank account and salary details (so we can pay you), your equity

grants (for stock and benefits plans administration) and details of your spouse and dependents (for emergency contact and benefits purposes).

The legal basis for these processing activities is the necessity to perform the employment contract between you and Griffith Foods.

We process our staff members' personal data through a global human resources system ("**HR System**"), which is a tool that helps us to administer HR and staff member compensation and benefits at an international level and which allows staff members to manage their own personal data in some cases. This might involve transferring your personal data to our servers in the US. Our parent company in the US, Griffith Foods Group Inc, may host these servers or utilize third-party servers, but in either case will be responsible for the security access of personal data on the HR System. For more information on international data transfers and the measures we take to protect your personal data in this respect, please refer to section 6 of this Notice.

(iii) The Griffith Foods global directory

We maintain a global directory of staff members which contain your professional contact details. This personal data is processed (and will be made available to everyone in the Griffith Foods Group) on the basis of our legitimate interest to facilitate global cooperation, communication and teamwork.

(iv) Other legitimate business purposes

We may also collect and use personal data when it is necessary for other legitimate purposes, such as to help us conduct our business more effectively and efficiently. We may also process your personal data on the basis of our legitimate interest to investigate violations of law or breaches of our own internal policies, under judicial authorization or to exercise or defend the legal rights of the Griffith Foods global group of companies.

(v) Law-related purposes

We also may use your personal data where we consider it necessary for complying with laws and regulations, including collecting and disclosing staff member personal data as required by law (e.g. for tax, health and safety, anti-discrimination laws).

Where the provision of personal data is a statutory or contractual requirement or a requirement necessary to enter into a contract with us, you are obliged to provide us with this personal data. If you do not provide this personal data, we may not be able to perform the employment contract with you.

4. Who we share your personal data with

We take care to allow access to personal data only to those who require such access to perform their tasks and duties, and to third parties who have a legitimate purpose for accessing it. Whenever we permit a third party to access personal data, we will implement appropriate measures to ensure the personal data is used in a manner consistent with this Notice and that the security and confidentiality of the personal data is maintained.

(i) Transfers to other group companies

As mentioned above, we will share your personal data with other members of the Griffith Foods group around the world in order to administer human resources, staff member compensation and benefits at an international level on the HR System, as well as for other legitimate business purposes such as IT services/security, tax and accounting, and general business management.

(ii) Transfers to third party service providers

In addition, we make certain personal data available to third parties who provide services to us. We do so on a "need to know basis" and in accordance with Applicable Data Protection Law.

For example, some personal data will be available to our staff member stock and benefit plans service providers and third-party companies who provide us with payroll support services, occupational health service, relocation, tax and travel management services.

(iii) Transfers to other third parties

We may also disclose personal data to third parties on other lawful grounds, including:

- To comply with our legal obligations, including where necessary to abide by law, regulation or contract, or to respond to a court order, administrative or judicial process, including, but not limited to, a subpoena, government audit or search warrant
 - In response to lawful requests by public authorities (including for national security or law enforcement purposes)
 - As necessary to establish, exercise or defend against potential, threatened or actual litigation
 - Where necessary to protect the vital interests of another person
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- In connection with the sale, assignment or other transfer of all or part of our business
- With your consent.

6. Transfer of personal data abroad

As we operate at a global level, we may need to transfer personal data to countries other than the ones in which the information was originally collected. These countries may have data protection laws that are different from the laws of your own country (and, in some cases, may not be as protective). When we export your personal information to a third country, we have taken steps to ensure that there are sufficient guarantees in terms of security and protection of personal data, in accordance with Applicable Data Protection Law (in particular the existence of an adequacy decision issued by the European Commission). In other cases, we take appropriate protective measures to ensure that personal data remain protected in accordance with this Notice, for example by entering into EU standard contractual clauses. Upon request, we will provide more information on this subject and a copy of these measures.

7. Data retention periods

Personal data will be stored in accordance with Applicable Data Protection Law and kept as long as needed to carry out the purposes described in this Notice or as otherwise required by applicable law. Generally, this means your personal data will be retained until the end of your employment, employment application, or work relationship with us plus a reasonable period of time thereafter to respond to employment or work-related inquiries or to deal with any legal matters (e.g. judicial or disciplinary actions), document the proper termination of your employment or work relationship (e.g. to tax authorities), or to provide you with ongoing pensions or other benefits.

8. Your data privacy rights

You may exercise the following rights available to you under and in accordance with Applicable Data Protection Law:

- The right of **access, rectification, or erasure** of your personal data. If you wish to exercise these rights you can contact us using the contact details provided at Section 10 below.
 - In addition, in accordance with Applicable Data Protection Law you can **object to processing** of your personal data, ask us to **restrict processing** of your personal
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information or **request portability** of your personal data. Again, if you want to exercise these rights you can contact us by using the contact details provided at Section 10 below.

- If we have collected and process your personal data with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal data conducted in reliance on lawful processing grounds other than consent.
- You have the **right to complain to a data protection authority** about our collection and use of your personal data. For more information, please contact your local data protection authority.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with Applicable Data Protection Laws.

9. Updates to this Notice

This Notice may be updated periodically to reflect any necessary changes in our privacy practices. In such cases where material changes are to be made we will inform you on the intranet/by company-wide email and employee announcement. However, where the changes are not material and aim to simply review or invoke a date change the change will be identified on the Review Page of the document and indicated at the top of the Notice when it was most recently updated. We encourage you to check back at this website periodically in order to be aware of the most recent version of this Notice.

10. Contact details

Please address any questions or requests relating to this Notice to GDPR-Advisor@griffithfoods.com or alternatively, you can raise any concerns with your line manager, local HR department, Privacy Coordinator or by using this email address.
