

Atlas Copco – Employment Policy

Title	Atlas Copco Group UK HR Privacy Policy
Release Date	May 2018
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1. General

This policy is issued by the Atlas Copco Group and applies to job applicants, employees (workers, contractors, volunteers, interns, apprentices) and former employees (“**you**”) of companies within the Atlas Copco Group (“**the Company**”).

In its role as potential employer or employer (whether the employment contract has commenced or not and has ended), the Company is required to process certain personal data of its employees in order to be able to fulfill its legal and contractual obligations and in order to establish a safe and efficient administration. Personal data may also be processed for other purposes as described in this policy.

This policy describes what kind of personal data is processed, the purposes for which it is processed, how the personal data about You will be used and shared during Your employment and after it ends.

The Company is the data controller of your personal data processed in relation to you within the framework of this policy. All personal data is processed in accordance with the, at the time, applicable data protection legislation and in accordance with this policy. If you have any questions about how the Company collects, processes and stores your personal data, please contact your local HR department.

2. Definition of personal data, and processing of personal data and special category of data

The term "personal data" is used to describe any information that may be used to identify, directly or indirectly, a specific individual. Examples of personal data are a person's first and last name, phone number, personal identity number, fingerprint and details of employment as well as a person's e-mail address and IP address, as long as the information can be used to identify a specific individual.

Processing of personal data is any operation or set of operations which is taken in relation to personal data, whether or not it occurs by automatic means, for example collection, recording, organization, storage, adaptation or alteration, retrieval, gathering or otherwise making information available, alignment or combination and blocking.

3. The personal data processed by the Company in relation to its Employees

The Company will only collect personal data necessary to fulfill the purposes of the processing of personal data, as stated below in Section **Error! Reference source not found.** The personal data is processed in accordance with the below defined purposes and good practice on the labor market.

Personal data processed by the Company relating to you may include:

- your name, address and contact details, including email address and telephone number, date of birth and gender
- the terms and conditions of your employment
- details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with the organisation
- information about your remuneration, including entitlement to benefits such as pensions or insurance cover
- details of your bank account and national insurance number
- information about your marital status, next of kin, dependents and emergency contacts,
- information about your nationality and entitlement to work in the UK
- information about your criminal record
- details of your schedule (days of work and working hours) and attendance at work
- details of periods of leave taken by you, including holiday, sickness absence, family leave and sabbaticals, and the reasons for the leave
- details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence
- assessments of your performance, including appraisals, performance reviews and ratings, training you have participated in, performance improvement plans and related correspondence
- information about medical or health conditions, including whether you have a disability for which the company needs to make reasonable adjustments
- equal opportunities monitoring information
- Your photograph to arrange a badge for access to the workplace
- Your personal data related to how the Company's IT-systems are used.

The company collects this information in a variety of ways. For example, data is collected through application forms, CVs or resumes; obtained from your passport or other identity documents such as your driving licence; from forms completed by you at the start of or during employment (such as benefit nomination forms); from correspondence with you; or through interviews, meetings or other assessments

Also, information relating to members of Your family or household may be collected from You (name, address and telephone numbers) and processed for the purpose of making it possible for the Company to make contact with such persons in case of emergency or for example in relation to an ex-pat assignment where such information may be required to obtain visa. You as

an employee shall inform the members of your household that the Company may process their personal data for this purpose.

In some cases, the company collects personal data about you from third parties, such as references supplied by former employers, information from employment background check providers, information from credit reference agencies, information obtained from social media monitoring and information from criminal records checks permitted by law.

Data is stored in a range of different places, including in your personnel file, in the organisation's HR management systems and in other IT systems (including the organisation's email system)

Only information and personal data that is deemed necessary for the management of the employment relationship and to fulfill the purposes set out in this policy will be processed by the Company.

4. Why does the company process personal data?

The company needs to process data to enter into an employment contract with you and to meet its obligations under your employment contract. For example, it needs to process your data to provide you with an employment contract, to pay you in accordance with your employment contract and to administer benefit, pension and insurance entitlements.

In some cases, the company needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check an employee's entitlement to work in the UK, to deduct tax, to comply with health and safety laws, to enable employees to take periods of leave to which they are entitled, and to consult with employee representatives if redundancies are proposed or a business transfer is to take place. For certain positions, it is necessary to carry out criminal records checks to ensure that individuals are permitted to undertake the role in question. It may also be necessary to process criminal records data in the context of disciplinary or grievance proceedings, for example to investigate and take appropriate action if you are suspected of committing an offence whether at or outside work.

In other cases, the company has a legitimate interest in processing personal data before, during and after the end of the employment relationship. Processing employee data allows the company to:

- run recruitment and promotion processes;
- maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency), and records of employee contractual and statutory rights;
- operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace;
- ensure employees are complying with relevant policies and procedures;
- operate and keep a record of employee performance and related processes, to plan for career development, and for succession planning and workforce management purposes;
- operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled;
- obtain occupational health advice, to ensure that it complies with duties in relation to individuals with disabilities, meet its obligations under health and safety law, and ensure that employees are receiving the pay or other benefits to which they are entitled;

- operate and keep a record of other types of leave (including maternity, paternity, adoption, parental leave, shared parental leave, and parental bereavement leave), to allow effective workforce management, to ensure that the company complies with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled;
- ensure effective general HR and business administration;
- conduct employee engagement surveys;
- provide references on request for current or former employees;
- to manage an effective protocol in case of emergency situations and crisis management;
- trade union memberships if any, to enable the Company to comply with its legal obligations under employment law;
- respond to and defend against legal claims and enforce its legal rights; and
- maintain and promote equality in the workplace.

Where the company relies on legitimate interests as a reason for processing data, it has considered whether those interests are overridden by the rights and freedoms of employees or workers and has concluded that they are not.

Some special categories of personal data, such as information about health or medical conditions, or racial or ethnic origin, is processed to carry out employment law obligations such as those in relation to employees with disabilities, for health and safety purposes and to ensure that employees have the right to work in the UK.

Where the company processes other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is done for the purposes of equal opportunities monitoring as permitted by the Data Protection Act 2018/reasons of substantial public interest. You can ask us to stop processing this data at any time.

Your photograph may be used as a profile photo on the Hub, Teams or Outlook (in the event you add such photograph yourself on Outlook) and the Company has then a legitimate interest to use it on an internal company chart that is stored in the intranet and to give access to such chart to its professional advisers who wish to see the Company structure.

In limited circumstances, your consent may be required to collect and process your personal data (e.g. your photograph to be displayed on the Company's website, in which case you have the right to withdraw your consent later).

5. How the personal data is handled

The Company will only process personal data for the purposes it was collected.

The Company will make personal data accessible only to the Company authorized employees (see Section **Error! Reference source not found.** for further information regarding authorized employees). The Company has taken appropriate technical and organizational measures for the protection of the personal data to ensure that only authorized persons are given access to the servers where personal data is stored. The Company is using technical security systems such as but not limited to firewalls, encryption technologies, passwords and anti-virus programs to prevent and avoid unauthorized use of personal data.

In accordance with the purposes stated in Section **Error! Reference source not found.**, the Company may need to provide personal data to relevant authorities based on mandatory law and in order to fulfill legal obligations in relation to the Company employees.

To enable the Company to comply with obligations under the employment contract, the Company may share personal data about you with the following data processors (this is not a limitative list):

- payroll service provider;
- insurers (for private healthcare, life assurance, disability insurance);
- pension provider.
- government and tax authorities

Your personal data may also be transferred to and processed by companies which perform services for the Company (data processors) or to customers, authorities or other third parties with which the Company has a contractual obligation in order for example for such companies, customers, authorities or other third parties to be able to perform the services requested by the Company, confirm the Company's compliance with applicable laws and regulations, or to safely receive supplies from the Company. Only personal data that is necessary to fulfill the purposes in Section **Error! Reference source not found.** will be provided to such parties. The data processors are obliged to act in accordance with data processing agreements signed with them, including, taking appropriate technical and organizational measures for the protection of the personal data and only process personal data for the purposes it was collected.

Due to the fact that the Company is a part of a group of companies with business activities in several different countries, personal data may be transferred to companies in the Atlas Copco group outside your own country and even to countries outside the EU/EEA that may not ensure as strict data protection legislation as in the EU/EEA. Such a transfer of personal data will always be done in accordance with applicable laws and regulations and the Company will ensure that appropriate technical and organizational measures are implemented.

6. Who has access to the data?

Your information will be shared internally, including with members of the HR and recruitment team, including payroll, your line manager, managers in the business area in which you work and IT staff if access to the data is necessary for performance of their roles.

Your data may also be shared with employee representatives in the context of collective consultation on a redundancy or business sale. [his would be limited to the information needed for the purposes of consultation, such as your name, contact details, role and length of service.

The company shares your data with third parties to obtain pre-employment references from other employers, obtain employment background checks from third-party providers, obtain necessary criminal records checks from the Disclosure and Barring Service, or report suspected offences to the appropriate authorities. The company may also share your data with third parties for the purposes of enforcing its legal rights. The company may share your data with third parties in the context of a sale of some or all of its business. In those circumstances the data will be subject to confidentiality arrangements.

The company also shares your data with third parties that process data on its behalf, in connection with payroll, the provision of benefits and the provision of occupational health

You as an employee are entitled, upon motivated written request by either e-mail or regular mail to the relevant local HR responsible, to obtain information on what personal data that is being processed and the purpose of such processing. You as an employee are also entitled to request any erroneous, misleading or incomplete personal data to be corrected. Please contact your local HR.

7. How long we Keep your Personal Data

The Company will keep your personal information during and after your employment for no longer than is necessary for the purposes for which your personal data is processed.

The Company will keep personal data that is required to keep in order to fulfill its legal obligations (. e.g. to keep your health records in the event of a claim for personal injury, payroll information in line with Government regulations). The Company may also keep basic information that is needed in order to provide you with information that you may request such as, for example, a certificate of the employee's employment with the Company.

Typically, retention periods will be as follows:

- Recruitment records for six months after completion of the recruitment process.
- Unsuccessful job applicants details and CV maybe kept with candidates' permission.
- Individual's employment for personal data will be kept for 9 months after date of leaving following the end of employment for legal purposes.
- Information relating to the payment of salary, bonuses and commission will be retained for six years following the end of employment in accordance with HMRC regulations.
- Health and safety records, training and certificates will be kept for at least three years but no longer than forty if related to a specific H&S regulation or control.

8. Miscellaneous

In order to ensure compliance with the applicable data protection legislation, as amended from time to time, this policy may be amended by the Company at any given time. The Company will inform you of any such changes. Any breach of the policy shall be reported to your local HR or the Group Privacy Officer, as applicable. Any breach of this policy will be taken seriously and may result in disciplinary actions and other necessary actions. 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.

You should notify the Company of any changes of the personal data relating to yourself in order to facilitate for an accurate and secure processing of personal data.

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October 2024 Types of data held and reason for processing