



OUR PEOPLE PRIVACY POLICY

Last Updated 11 March 2026

The Edrington Group Limited is a private limited company (registered in Scotland No.SC036374), and our registered office is situated at 100 Queen Street, Glasgow, G1 3DN. Processing of personal data relating to Edrington's recruitment process as described in this Our People Privacy Policy ("**Policy**") is undertaken by Edrington Distillers Limited, Edrington Distillers Group Limited, Highland Distillers Limited and The Macallan Distillers Limited as well as other group companies (such as regional employing entities, including Edrington India Private Limited) of The Edrington Group Limited ("**Group Entities**") where relevant – details of these group companies can be found in Appendix A of this Policy .

In this Policy, The Edrington Group Limited and the Group Entities are referred to as "**Edrington**", "**we**", "**us**" or "**our**". Edrington is the data fiduciary in relation to the processing of your personal data described in this Policy. This is Edrington's global Policy, but please check the [Data Privacy page](#) of our legal hub for any supplementary policies that apply specifically to your location, including for India.

Edrington is committed to safeguarding the privacy of the personal data that we hold concerning our current and former employees, workers and contractors ("**you**", "**your**" or "**people**") for management, human resources and payroll purposes. This Policy explains how and why we collect and use your personal data in the context of your engagement with us.

This Policy does not form part of your employment contract/agreement or at will employment. We reserve the right to amend this Policy at any time.

We have appointed a Global Data Privacy Manager. If you have any questions about this Policy or how we handle your personal data, please contact us at 'dataprotection@edrington.com'.

Personal Data:

In this Policy, your 'personal data' means any data/information about you from which you can be identified. Appendix B of this Policy lists your personal data that we may process as part of your engagement with Edrington. This Policy does not include data/information where your identity has been removed (anonymous data).

It is important that your personal data is accurate and up to date. Please keep us informed if your personal data changes during your engagement with Edrington.

Collection of personal data:

The personal data is either (a) provided to Edrington by you; (b) obtained from third parties, (normally through job application(s) and recruitment process); and/ or (c) created by us in the course of job-related activities during your engagement with us. Your data may be obtained from the following third parties:

- former employers or other referees;
- employment agencies, recruitment agencies, credit reference agencies or other background check agencies;
- medical professionals, including physiotherapists engaged by our occupational health team or GPs / doctors providing evidence of medical conditions for work attendance or adaptation requests;

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- other employees, workers, contractors, customers or consumers;
- any professional bodies of which you are a member of or have received qualifications or training from; and
- IT suppliers regarding your use of our IT systems

Information about criminal convictions:

We will only collect your personal data pertaining to criminal convictions *via* background screening if it is appropriate given the nature of your role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you.

We will use information about criminal convictions and offences in the following ways: (1) where it is necessary to protect your interests, our interests and those of other employees and/or to protect clients and other third parties from theft, fraud and similar risks; and (2) where it is necessary in relation to legal claims. We may use your personal data in this way where it is necessary to carry out our employment rights and obligations and in accordance with our data protection policy.

Processing your personal data:

Depending on your location, we may process your personal data based on any of the following lawful basis or other lawful bases in accordance with applicable law. Appendix B details our lawful bases for processing your personal data.

In general, we process your personal data to:

- carry out background and reference checks, where applicable;
- determine the terms of which you may work for us, and advise you of these;
- check you are legally entitled to work in the country where you have applied for a role;
- contact you;
- administer our contract with you and ensure compliance with the terms of your contract;
- provide and process payments and benefits to you (including complying with pension obligations, liaising with your pension provider and determining pension eligibility) and, if applicable, deduct tax;
- assess qualifications and suitability for a job or task;
- carry out business management and planning, including accounting and auditing;
- manage performance and conduct;
- make decisions about salary and compensation;
- conduct disciplinary and grievance proceedings;
- make decisions about continued employment or engagement;
- make arrangements for the termination of our working relationship;
- manage sickness absence, assess your fitness to work and consider disability status and reasonable adjustments for disabled workers;
- manage flexible working applications;
- manage requests for time off work (including time off for antenatal appointments, maternity, paternity, adoption, [modern family leave], time off for dependents and carers' leave, bereavement and other approved leave(s) of absence);
- carry out education, training and development;
- comply with pay gap reporting obligations, if applicable;
- monitor your use of our IT and communications systems;
- prevent and detect crime and ensure a safe work environment, including through the use of CCTV and entry logs;
- comply with health and safety obligations;

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- carry out equal opportunities monitoring;
- maintain records of your working time, holidays and working time opt-out agreements, if applicable;
- inform your contacts in the event of sickness, accident or other emergency;
- protect your vital interests or those of another person (in exceptional circumstances, such as a medical emergency);
- for business and brand promotion;
- understand employee attrition rates;
- arrange and manage employee networking, training and social events;
- provide a reference regarding you;
- establish, exercise or defend legal claims;
- in the context of an actual or potential sale or restructuring of the business; and/or
- comply with the law or requirements of a regulator.

We do not envisage taking any decisions about you based solely on automated processing (*i.e.*, without human involvement), which have a legal or similarly significant effect on you.

Right to Object:

Where you are based in one of our UK or EU locations (or another location where similar rules apply) and we use your personal data to perform tasks carried out in the public interest or for our legitimate interests (as detailed in Appendix B), then you have the right at any time to object to our use of your personal data for that purpose. We will stop using that personal data, unless there are overriding legitimate grounds to continue, or the processing is relevant for legal claims.

Personal data necessary for the contract / statutory requirements:

Appendix B of this Policy sets out your personal data that is necessary for us to enter into or carry out our contract with you. If you don't provide this personal data, we may not be able to enter into, or carry out, the contract. For example, if you don't provide us with your bank details, we may not be able to pay you.

In some circumstances, the provision of your personal data, specifically for the purposes of your employment with Edrington, is a statutory requirement. This includes *inter alia*:

- documentation confirming your right to work in the country where you have applied for a job – if you don't provide this, we may not be able to enter into an employment contract/agreement with you, or we may need to terminate your employment contract/agreement;
- statutory information you must provide to us if you wish to take maternity leave, dependent care leave or to claim any statutory payments in relation to such leave or other statutory benefits – if you don't provide this, we may not be able to comply with our legal obligations and/or provide relevant benefits to you; and/or
- information required for us to carry out background screening where this is relevant to your role – if you don't provide this, we may not be able to carry out such screening and/or enter into an employment contract/agreement with you, or we may need to terminate your employment contract/agreement.

Sensitive or special categories of personal data:

'Sensitive' or 'special categories of personal data' means information about your racial or ethnic origin; political opinions or affiliations; religious or philosophical beliefs; trade union membership; health; sex life or sexual orientation; criminal convictions, offences or alleged offences; genetic data; or biometric data for the purpose

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of uniquely identifying you. Data marked* in Appendix B of the Policy falls within these categories or might disclose such categories of personal data.

We must have additional lawful bases for processing sensitive or special categories of personal data. These are set out in Appendix B of the Policy.

Consent:

We do not need your consent if we use special categories or sensitive personal data to carry out our legal obligations or exercise specific rights in the field of employment law or occupational health, or where another applicable legal basis applies under data protection laws. In limited circumstances, we may request your consent to process certain particularly sensitive data. If we do so, we will provide you with full details of the personal data that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. It will not be a condition or your engagement that you agree to any request for consent from us.

In India, we rely on your consent only where it is required under applicable law. Where processing is permitted without consent under applicable Indian law (such as for employment purposes, legal obligations or legitimate uses), we will do so in accordance with such provisions.

To the extent not permitted by law, where applicable data protection laws require us to seek your consent in certain regions, we will rely on your consent as the ground to process your personal data for these purposes, rather than legitimate purposes.

What are your rights and duties?

You may have a number of rights under applicable data protection laws in relation to the way we process your personal data, namely:

- **access:** you can request to access information in relation to your personal data held by us - this enables you to access (a) a summary of your personal data and a description of the processing activities we are undertaking with respect to such personal data; and (b) the identities of all other data fiduciaries and data processors with whom your personal data has been shared along with a description of the personal data so shared;
- **rectification:** you can ask us to correct your personal data if it is inaccurate, incomplete, unclear or outdated;
- **erasure:** in certain circumstances, to have your personal data deleted or removed;
- **restriction:** in certain circumstances, to restrict the processing of your personal data;
- **objection:** in certain circumstances, to object to the processing of your personal data where we are relying on a legitimate interest on the basis of your particular situation. We will only then continue the processing if we have overriding legitimate grounds for this, or the processing is to establish, exercise or defend legal claims;
- **portability:** a right of data portability, namely to obtain and reuse your personal data for your own legitimate purposes across different services;
- **automated decision-making:** not to be subject to automated decision making (including profiling), where it produces a legal effect or a similarly significant effect on you;

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- **nominate individual:** you shall have the right to nominate any other individual, who shall, in the event of your death or incapacity exercise your rights in accordance with applicable laws;
- **approach:** you shall have the right to approach us and the Data Protection Board of India in the event of any grievances;
- **complain:** you have the right to lodge a complaint with the relevant authority in relation to violation of your personal data; and
- **compensation:** to claim compensation for damages caused by a breach of the data protection laws.

By sharing your personal data with Edrington, you undertake to always:

- be in compliance with applicable laws;
- ensure not to impersonate another person while providing your personal data for the purposes specified under this Policy; and
- ensure not to suppress any material information while providing any personal data for any document, unique identifier, proof of identity or proof of address.

If you wish to exercise any of these rights, please email 'dataprotection@edrington.com'.

Please note that we may be unable to delete or remove your personal data which we need as part of your employment with Edrington.

Who do we share your personal data with?

We will share your personal data with other employees and with the Group Entities for administrative, management and accounting purposes, and as part of our regular reporting activities on company performances, in accordance with applicable data protection laws, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data.

To effectively fulfil our obligations to you, including managing your engagement, and to provide you with certain benefits, we use a number of trusted and reliable third parties to carry out functions which involve the processing of your personal data such as:

- applicable tax or governmental authorities in your region
- health and safety executive or other applicable health and safety authorities in your region;
- health professionals and occupational health providers, including physiotherapists;
- potential or actual purchasers of our business, or other third parties in the context of a possible sale or restructuring of the business;
- regulators that require information in the context of investigations, for example, competition law regulators;
- our professional advisors;

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- our service providers, including:
 - IT service providers, including those who manage our employee management and recruitment systems, recruitment assessments, video interviews, external checks, employee engagement surveys, learning and development programmes, training and shared IT systems;
 - payroll administrators;
 - pension scheme providers;
 - insurance brokers;
 - health benefits and life insurance providers;
 - building security providers;
 - share scheme and shareholder administration providers;
 - recognition and rewards providers;
 - global mobility support (tax and immigration) providers; and
 - those involved in providing training and benefits in connection with your employment or engagement;
- public sources: for business promotion, we may share details of your name, work location, job title, photographs and videos of you;
- where your role requires a check of your driving license, we may use a third party provider who will retain a copy of your driving license and check the DVLA register or equivalent data in your jurisdiction to ensure that you do not have any driving convictions;
- any person specified by you, where you ask us to provide a reference to that person;
- third party venues where employee events are taking place to confirm and manage your attendance; and
- other third parties as necessary to comply with the law.

We contract with such third parties to ensure that they only process your personal data under our instructions and in accordance with applicable data protection laws and ensure the security and confidentiality of your personal data by implementing the appropriate technical and organizational measures for such processing.

When sharing your personal data in the above circumstances, we will also fulfil other statutory obligations as may be required by the applicable laws, such as informing you of the details of the receivers and obtaining your separate consent (if required under applicable laws). Where we share personal data with third parties we ensure that the third parties are bound by strict confidentiality obligations and we reserve the right to audit their systems and processes to verify the security of your personal data.

Where is your personal data stored?

Edrington is a global company with our headquarters based in the UK and so your personal data will most likely be stored in the UK, which will involve a transfer of personal data to the UK if you are based in another region. We may transfer your personal data outside of India for the purposes listed in this Policy, primarily to other Edrington employees or where third party suppliers are based outside of India. There is either: (1) an adequacy decision under data protection law in respect of that country, meaning that it is deemed to provide an adequate level of protection for your personal information; (2) we have put in place the following measures to ensure that your personal data receives adequate protection: intra-group contractual safeguards and a process for assessing and maintaining the security and integrity of IT systems used across the Edrington Group. You can access a copy of these by contacting us at the details below; or (3) you have consented to the transfer.

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How long do we keep your personal data for?

We strive to only keep your personal data for so long as is necessary, in connection with the purpose for which we collected the personal data, in accordance with applicable law.

We will retain your personal data during your engagement and for three years after you leave Edrington to allow us to establish, exercise or defend legal claims, with the exception of the following:

- out-of-date contact, emergency contact and bank account details when you provide us with updated details;
- current bank account details will be retained during your engagement and deleted when the final payment to you has been processed following termination of your engagement, unless you remain a shareholder then these will continue to be retained for as long as you are a shareholder;
- payroll, salary and benefit details, including pension and bonus payments for seven years from the end of the financial year to which the payment relates;
- photographs and videos of you during your engagement may be retained for longer for archiving purposes and when available on public domains.

Questions

If you have any questions about the way in which your personal data is processed, please contact us at dataprotection@edrington.com.

If you are based in India, you may contact our grievance officer with any inquiry relating to this privacy policy or your personal data. Contact details for our India grievance officer are provided in the Complaints section below.

We will undertake all reasonable efforts to address your grievances/concerns and communicate to you with necessary steps at the earliest possible opportunity.

Complaints

If you have applied for a role in the UK, you have the right to complain about data protection matters to the Information Commissioner's Office (ICO). The ICO is the UK's independent body set up to uphold information rights. You can find out more about the ICO on its website (<https://ico.org.uk/>). The ICO can be contacted by calling 0303 123 1113.

You can also lodge a complaint with a data protection regulator in the jurisdiction in which you are based. For example:

- If you are based in South Africa, you have the right to contact the information regulator to lodge a complaint through its website [here](#). The information regulator can be contacted by calling 010 023 5200;
- If you are based in France, you have the right to complain about data protection matters to the CNIL, which is the French supervisory authority for data protection issues; and
- If you are based in Sweden, you have the right to complain to Sw. Integritetsskyddsmyndigheten, which is Sweden's supervisory authority for data protection issues.

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If you are based in India, you have the right to raise complaints about data protection matters:

- You may contact our grievance officer to raise any concerns or complaints regarding the processing of your personal data or this Privacy Policy.
- The grievance officer will address your complaint in accordance with the timelines prescribed under Indian Data Protection Laws. Contact details for the grievance officer are provided below:

Name: Sidharth Tandon

Email: GrievanceOfficer@edrington.com

Phone: +919990661775

Address: 1A146 and 1A149, WeWork Platina Tower, MG Road, Near Sikandarpur Metro Station, Sector 28, Gurugram 122001, Haryana, India

In the event of a breach of your personal data, you have the right to lodge a complaint with the Data Protection Board of India, which is the Indian adjudicating body and supervisory authority for data protection issues.

We would however appreciate the chance to discuss and work with you to address your concerns before you approach the ICO or another regulator, so please contact us in the first instance.

Security

We follow strict security procedures as to how your personal information is stored and used, and who sees it, to help stop any unauthorized person accessing it.

Changes

This Policy will be changed from time to time. If we change anything important about this privacy policy (the information we collect, process, how we use it or why) we will notify you.

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Appendix A: The Edrington Group Companies

The table includes details of The Edrington Group’s entities which process personal data relating to Edrington’s employees as described in the Policy. If you have any queries regarding the processing of your personal data please contact Edrington at dataprotection@edrington.com.

| Company | Registered Address | Location of Registration |
|------------------------------------|--|----------------------------|
| The Edrington Group Limited | 100 Queen Street, Glasgow, G1 3DN | Scotland |
| Highland Distillers Limited | 100 Queen Street, Glasgow, G1 3DN | Scotland |
| Edrington Distillers Limited | 100 Queen Street, Glasgow, G1 3DN | Scotland |
| The Macallan Distillers Limited | The Macallan Distillery, Craigellachie, Banffshire, AB38 9RX | Scotland |
| Edrington Distillers Group Limited | 100 Queen Street, Glasgow G1 3DN | Scotland |
| Brugal & Co S.A. | Brugal & Co., S.A. is Carretera Luperón km 3 1/2, Puerto Plata | Dominican Republic |
| Casa Brugal RD, S.A. | Casa Brugal RD, S.A. is Avenida Núñez de Cáceres esq. Rómulo Betancourt, Downtown Business Tower, piso 11, Santo Domingo, Distrito Nacional | Dominican Republic |
| Edrington Shanghai Limited | Unit 1, 19/F, Tower 1, Grand Gateway, No.1 Hong Qiao Road, Shanghai, PR China | People’s Republic of China |
| Edrington Hong Kong Limited | Suite 1207-07 Exchange Tower, 33 Wang Chiu Road, Kowloon Bay, Hong Kong 17th Floor, Two Pacific Place, 88 Queensway, Admiralty, Hong Kong SAR | Hong Kong |
| Edrington Singapore Pte Ltd | 2 Central Boulevard, #31-02 IOI Central Boulevard Towers, Singapore 018916 | Singapore |
| Edrington Taiwan Ltd | 9F, No. 9 Songgao Road, Xinyi Dist., Taipei 110, | Taiwan |
| Edrington (M) SDN BHD | 16-02, Tower A, Vertical Business Suite, Bangsar South, Jalan Kerinchi, 59200 Kuala Lumpur, Malaysia | Malaysia |
| Edrington Middle East & Africa Ltd | 4 Megalou Alexandrou Street, Aglantzia, 2121 Nicosia, Cyprus Makrasykas 1, KBC North, Office 201, Strovolos, 2034 Nicosia, Cyprus | Cyprus |

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|---|---|-----------------|
| Edrington Group, USA, LLC. | 18 West 24 th Street, 4th Floor, New York, NY 10010, USA | Delaware, USA |
| Edrington Mexico, S.A. DE C.V | Paseo de los Tamarindos 90, Piso 18, Ofic 113, FIC 113, Bosques de las Lomas, 05120 Cuajimalpa de Morelos, Ciudad de Mexico Av. Javier Barros Sierra 495, Floor 1, Office 01 - 116. Col. Santa Fe | Mexico |
| Maxxium Nederlands | De Cuserstraat 89 Amsterdam, 1081 CN Netherlands | The Netherlands |
| Maxxium BeLux | 0770.344.997, Leuvensesteenweg 643 - 1930 Zaventem | Belgium |
| Edrington UK Distribution Limited | 100 Queen Street, Glasgow, G1 3DN | Scotland |
| Edrington Africa | 3021 William Nicol Drive, Block A, Ground Floor, Bryanston 2191, Johannesburg, South Africa | South Africa |
| Edrington Demark A/S | Dronningens Tvaergade 9, 1302 Copenhagen, Denmark | Denmark |
| Edrington Sweden AB | Luntmakargatan 46, Box 5341, 102 47 Stockholm, | Sweden |
| Edrington Norway AS | Rådhusgata 30b, 0151 Oslo | Norway |
| Edrington Finland OY | Firdonkatu 2 T 144, 00520 Helsinki | Finland |
| Edrington European Travel Retail Limited | 100 Queen Street, Glasgow, G1 3DN | Scotland |
| Vasyma S.L. | PE Jerez, C/ Einstein, 6. 11407. Jerez de la Frontera, | Spain |
| Destiladores y Bodegueros, S.L.U. | Calle Jardineria 7, Parque Empresarial Oeste, Jerez de la Frontera 11408-Cádiz | Spain |
| Edrington India Private Limited | 1A146 and 1A149, WeWork Platina Tower, MG Road, Near Sikandarpur Metro Station, Sector 28, Gurugram 122001, Haryana, India | India |
| The Macallan Sherry Cask Company, S.L.U. | IV, Carretera Nacional, 11408 Jerez de la Frontera, Cádiz | Spain |



Appendix B: Personal Data

Data marked * in the table below is ‘sensitive or special categories of personal data’ or might disclose such information. We must have additional legal bases for processing sensitive or special categories of personal data – these are listed in the right column of the table.

| Your personal data | Reason for processing personal data | Legal basis for processing |
|---|---|---|
| <ul style="list-style-type: none"> • Personal contact details (name, address, telephone number, date of birth, email address, LinkedIn profile, nationality, work permit status, emergency contact details) • Passport information, identity documents, national identification number, driving licence details, vehicle registration and driving history • Tax and national insurance details, including national insurance number • Veteran status (US based candidates only) • Bank account details • Application form, CV and interview notes • Correspondence and results regarding background checks • References and details of previous employers • Industry, notice period, salary expectations • Education, skills, professional memberships, qualifications and academic transcripts • Offer letter and contract • Work location • Start date • Criminal convictions and offences* | <p>Make a decision about your recruitment or appointment, including assessing your skills, qualifications and suitability for the work.</p> <p>Carry out background and reference checks, where applicable.</p> <p>Determine the terms on which you work for us and advise you of these.</p> <p>Make decisions about salary and compensation.</p> <p>Manage your onboarding as an employee.</p> | <p>To enter into a contract with you.</p> <p>To comply with a legal obligation.</p> <p>For our legitimate interests:</p> <ul style="list-style-type: none"> • select suitable employees, workers and contractors. <p><u>*For sensitive/special categories:</u></p> <ul style="list-style-type: none"> • perform or exercise legal obligations imposed on us by law in connection with employment. |
| <ul style="list-style-type: none"> • Personal contact details (name, address, telephone number, date of birth, email address, emergency contact details) • Absence records (excluding data disclosing sickness and health information) • Holiday records | <p>Manage sickness absence.</p> <p>Assess fitness to work.</p> <p>Considering and implementing reasonable adjustments.</p> <p>Comply with pay gap reporting obligations.</p> | <p>To carry out a contract with you.</p> <p>To comply with a legal requirement.</p> <p>For our legitimate interests:</p> <ul style="list-style-type: none"> • business management; • workforce planning; • ensure a suitable workforce; • ensure compliance with our policies and procedures; |



| Your personal data | Reason for processing personal data | Legal basis for processing |
|---|---|--|
| <ul style="list-style-type: none"> • Hours worked, overtime, shift records, office attendance, swipecard entry records • Holiday records • Information and correspondence regarding pregnancy, birth, modern family leave, time off for dependents and carers' leave* • Information and correspondence regarding breastfeeding* • Legal gender • Health data, including disability information, and sickness records* • Diversity data, including ethnicity, gender identity and sexual orientation (only where specifically requested)* • Information and correspondence relating to disciplinary and grievance investigations and proceedings • Information confirming you have read and understood our policies and procedures • Details of job titles and duties, work history, performance and appraisal (PDR) records | <p>Monitoring diversity, equity and inclusion.</p> <p>Inform your contacts in the event of sickness, accident or other emergency.</p> <p>Protect your vital interests or those of another person (in exceptional circumstances, such as a medical emergency).</p> | <ul style="list-style-type: none"> • good employment practice; • review equality of opportunity or treatment; and • ensure our assets are protected, kept confidential and not used for inappropriate or unlawful purposes. <p><u>*For sensitive/special categories:</u></p> <ul style="list-style-type: none"> • review equality of opportunity or treatment; • perform or exercise legal obligations imposed on us by law in connection with employment; and • with your explicit consent. |
| <ul style="list-style-type: none"> • Personal contact details (name, address, telephone number, email address, date of birth, marital status, nationality, work permit status) • Tax and national insurance details, including national insurance number • Offer letter and contract • Work location • Start date • Employee number, line manager, business unit division, contract type and performance rating • Details of job titles and duties, work history, performance and appraisal (PDR) records • Flexible working arrangements • Bank account details | <p>Contact you for any purpose relating to your employment or our business, including in emergency situations.</p> <p>Administer our contract with you and ensure compliance with the terms of your contract.</p> <p>Provide and process payments and benefits to you (including complying with pension auto-enrolment obligations, liaising with your pension provider and determining pension eligibility).</p> | <p>To carry out a contract with you.</p> <p>To comply with a legal requirement.</p> <p>For our legitimate interests:</p> <ul style="list-style-type: none"> • business management; • workforce planning; • ensure a suitable workforce; • ensure compliance with our policies and procedures; • good employment practice; • review equality of opportunity or treatment; and • ensure our assets are protected, kept confidential and not used for inappropriate or unlawful purposes. <p><u>*For sensitive/special categories:</u></p> |

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| Your personal data | Reason for processing personal data | Legal basis for processing |
|---|---|---|
| <ul style="list-style-type: none"> • Payroll and wage records, compensation history, salary and benefits details, including pension and bonus details • Absence records (excluding data disclosing sickness and health information) • Hours worked, overtime, shift records, office attendance, swipecard entry records • Holiday records • Information and correspondence regarding pregnancy, birth, modern family leave, time off for dependents and carers' leave* • End date and reason for termination • Information from exit interviews • Biometric data, facial recognition and browsing information* | <p>If applicable, deduct tax, national insurance and other salary sacrifice benefits.</p> <p>Collect information regarding your reasons for leaving our business.</p> <p>To provide a reference regarding you.</p> | <ul style="list-style-type: none"> • review equality of opportunity or treatment; • perform or exercise legal obligations imposed on us by law in connection with employment. |
| <ul style="list-style-type: none"> • Personal contact details (name, address, telephone number, email address, date of birth, nationality, national identification number, gender, signature) • Offer letter and contract • Work location • Start date • Employee number, line manager, business unit division, contract type and performance rating • Details of job titles and duties, work history, performance and appraisal (PDR) records • Education, skills, professional memberships, degrees and academic transcripts • Grade, professional memberships and qualifications • Training records • Information and correspondence regarding flexible working arrangements • Payroll and wage records, compensation history, salary | <p>Business management and planning, including accounting or auditing.</p> <p>Manage performance and conduct.</p> <p>Make decisions about salary and compensation.</p> <p>Conduct disciplinary and grievance proceedings.</p> <p>Assess skills, qualifications and suitability for a job or task, including promotion decisions.</p> <p>Manage flexible working applications.</p> <p>Make decisions about continued employment or engagement.</p> <p>Make arrangements for the termination of our working relationship.</p> | <p>To carry out a contract with you.</p> <p>To comply with a legal requirement.</p> <p>For our legitimate interests:</p> <ul style="list-style-type: none"> • business management; • workforce planning; • ensuring a suitable workforce; • ensure compliance with our policies and procedures; • good employment practice; • review equality of opportunity or treatment; and • ensure our assets are protected, kept confidential and not used for inappropriate or unlawful purposes. <p><u>*For sensitive/special categories:</u></p> <ul style="list-style-type: none"> • review equality of opportunity or treatment; • for the purposes of any potential and/or actual litigation or investigations concerning us or any group company or its officers; and • perform or exercise legal obligations imposed on us by |

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| Your personal data | Reason for processing personal data | Legal basis for processing |
|--|---|---|
| <p>and benefits details, including pension and bonus details</p> <ul style="list-style-type: none"> • Absence records (excluding data disclosing sickness and health information) • Hours worked, overtime, shift records, office attendance, swipecard entry records • Holiday records • Information and correspondence regarding pregnancy, birth, modern family leave, time off for dependents and carers' leave* • Information and correspondence relating to disciplinary and grievance investigations and proceedings • Information confirming you have read and understood our policies and procedures • Information about your use of our information and communications systems • CCTV images (more detail on this is in our CCTV policy) • Redundancy information, including pooling data, selection matrixes, consultation notes and correspondence • Trade union membership* • Criminal convictions and offences* | <p>For business promotion.</p> | <p>law in connection with employment.</p> |
| <ul style="list-style-type: none"> • Personal contact details (name, telephone number, email address, date of birth, gender, nationality and emergency contact details) • Passport information and identity documents • National insurance and identity numbers • Employee number, line manager and business unit division • Details of job titles and duties • Education history • Grade • Training records | <p>Carry out education, training and development.</p> <p>Organise and manage employee networking and social events.</p> | <p>To carry out a contract with you.</p> <p>To comply with a legal requirement.</p> <p>For our legitimate interests:</p> <ul style="list-style-type: none"> • business management; • workforce planning; • ensuring a suitable workforce; • ensure compliance with our policies and procedures; • good employment practice; and • ensure our assets are protected, kept confidential and not used for inappropriate or unlawful purposes. |

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| Your personal data | Reason for processing personal data | Legal basis for processing |
|--|--|--|
| <ul style="list-style-type: none"> • Compensation history, salary and benefits details • Professional memberships • Dietary requirements* | | |
| <ul style="list-style-type: none"> • Name and email address • Work location • Information about your use of our networks, information and communication systems, and emails / messages passing through our systems and on Edrington devices • Correspondence to and from you (electronic or otherwise) and messages during times when you are absent from the workplace • Photographs of you • CCTV images • Hours worked, overtime, shift records, office attendance, swipecard entry records • Training records • Information and correspondence regarding pregnancy, birth, modern family leave, time off for dependents and carers' leave* • Information and correspondence regarding breastfeeding* • Health data, including disability information, and sickness records* | <p>Monitor your use of our IT and communications systems.</p> <p>Prevent and detect crime and ensure a secure work environment, including ensuring the business is protected from cybersecurity threats.</p> <p>Comply with health and safety obligations.</p> | <p>To carry out a contract with you.</p> <p>To comply with a legal requirement.</p> <p>For our legitimate interests:</p> <ul style="list-style-type: none"> • business management; • workforce planning; • ensuring a suitable workforce; • ensure compliance with our policies and procedures; • good employment practice; and • ensure our assets are protected, kept confidential and not used for inappropriate or unlawful purposes. <p><u>*For sensitive/special categories:</u></p> <ul style="list-style-type: none"> • perform or exercise legal obligations imposed on us by law in connection with employment; and • for the purposes of any potential and/or actual litigation or investigations concerning us or any group company or its officers. |