

Colt's General Privacy Notice for employees

1. What does this Privacy Notice cover?

The purpose of this present General Privacy Notice for employees ("Privacy Notice") is to **inform** in a plain language to you, Colt's employees or Colties, how **Colt Technology Services** Group Limited ("Colt" or "Colt group") collect and handle/process your Personal Data as detailed below.

Colt collects and uses your **Personal Data** to manage every employment relationship, to comply with Colt's legal obligations as employer, to achieve Colt's business legitimate interests and, occasionally, for other purposes based on individual consent if applicable.

Colt is committed to providing with the **highest standards of Data Protection**, thus your personal data will be used in line with applicable data protection laws, including without limitation, the Regulation (EU) 2016/679 (General Data Protection Regulation – EU GDPR) and the UK GDPR.

Colt is also committed to comply with **local laws** on data protection. If necessary, local applicable specifications will be included in a separate document.

This Privacy Notice **describes** what Personal Data will be handled/processed by Colt, how, why, our legal basis, for how long, with whom will it be shared and the rights that may be available to you as an employee, among other details.

2. What Personal Data does Colt process, why and what for?

Colt only collects and processes your Personal Data, when Colt has a legal basis and the Personal Data is necessary for a legitimate purpose. For example and without limitation, as follows:

What Personal Data?	Legal basis	What purpose for?
Name and contact data: name and surname, address and contact details, including email address, telephone number.	Execution of a contract	To comply with Colt's obligations related to the employment agreement (before, during and after the contractual relationship)
Background information: background screening, details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with Colt and, your criminal record if necessary in relation to your role at Colt.	Legal obligation	To comply with Colt's obligations derived from legal, regulatory, tax, labor, telco regulations, security laws and standards, social security, health and safety laws.
Personal and family information: date of birth, gender, your nationality, entitlement to work in the respective country, marital status, next of kin, dependents and emergency contacts.	Execution of a contract and Colt's	To maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency),

Employment information: terms and conditions of your employment, your remuneration, including entitlement to benefits such as pensions or insurance cover, your schedule (days of work and working hours) and attendance at work, periods of leave taken by you, including holiday, sickness absence, family leave and sabbaticals, and the reasons for the leave, any disciplinary or grievance procedures in which you have been involved, your performance, including appraisals, performance reviews and ratings, performance improvement plans and related correspondence and, details during your life-cycle as a Colt employee including reason for leaving and results of the surveys you participated in.

Financial Information: your bank account and national insurance number.

Sensitive data: Information about medical or health conditions, including whether or not you have a disability for which Colt needs to make reasonable adjustments and, equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.

legitimate interest

To **operate and keep a record** of disciplinary and grievance processes, of employee performance and related processes, of absence and absence management procedures, of other types of leave (including maternity, paternity, adoption, parental and shared parental leave),

to **obtain** occupational health advice, to **ensure** effective general HR and business administration,

to **provide** references on request for current or former employees, to **respond** to and defend against legal claims, and

to maintain and **promote** equality in the workplace

to **run** recruitment and employee promotion processes.

Individual's consent, legal obligation and execution of a contract.

To process certain **sensitive personal data** in relation to employees with disabilities and to ensure equal opportunities

3. Where does Colt process your Personal Data and with whom do we share it?

Colt processes, shares and will transfer your Personal Data as follows:

Colt processes your Personal Data within the UK, the European Economic Area (EEA), India for Indian employees, Japan for Japanese employees and China for Chinese employees. Due to global HR processes employees' information and Personal Data are shared all over Colt's Group entities by means of Colt's Binding Corporate Rules (BCRs), and adequate safeguards.

Third-parties: Colt will share your Personal Data with third party services providers for the legal purposes detailed above.

Additionally, Colt will share basic contact data with customers and partners that will process your Personal Data on Colt's behalf due to the commercial relationship.

Some of the mentioned third parties may be outside of the EEA, Colt will transfer your Personal Data outside the EEA and to jurisdictions without an adequacy decision from the European Commission only where adequate safeguards have been put in place (where appropriate EU Commission approved Standard Contractual Clauses, Japanese SCCs or any other local SCCs).

In addition, Colt may share your Personal Data if necessary to comply with a legal or regulatory obligation requested by law enforcement agency, court, regulator, auditors, tax authority or any other government authority.

4. How does Colt protect Personal Data?

Colt takes the protection and security of your Personal Data seriously by means of:

Colt internal policies and controls: Colt has internal policies and controls in place to ensure that your Personal Data is securely processed.

Third-parties: Where Colt engages with third parties to process Personal Data on its behalf, they do so in compliance with GDPR and privacy law requirements, subject to a duty of confidentiality and the implementation of appropriate technical and organizational measures to ensure the secure processing of Personal Data.

5. For how long does Colt keep Personal Data?

Colt will only retain your personal data for the duration of your employment in accordance with legally required retention periods unless there is a legitimate reason for retaining it further. Your Personal Data will only be retained for as long as it is required or to meet Colt's legal obligations.

Colt has implemented a document containing global maximum retention periods for personal data considering local HR retention obligations. Should you wish detailed information please contact HRContactCentre@colt.net.

6. Use of Artificial Intelligence

As part of Colt's commitment to safeguarding the privacy and Personal Data of its employees, Colt is using artificial intelligence (AI) within the organization. AI is utilized to enhance our operations, improve the efficiency and provide a better experience for our employees, however AI systems are configured to process employee data minimally, focusing only on what is necessary to fulfill their intended functions.

Colt is dedicated to ensuring that these technologies are used responsibly, aligning with our core values of integrity, transparency, and respect for individual privacy rights. We adhere to strict data governance and privacy standards, ensuring that all AI systems are operated in compliance with applicable data protection laws and regulations, implementing specific privacy impact assessment analysis including security, ethics, privacy and IT controls to ensure that our use of AI aligns with responsible and ethical uses.

Employees have the right to be informed about the AI systems that process their data, the purposes for which their data is used, and the measures in place to safeguard their privacy. We are committed to providing transparency and control over personal data, offering employees the ability to exercise their data protection rights in the use of their data by AI systems.

7. How can you exercise your Data Protection Rights?

You can **exercise your rights** of access, rectification, erasure, restriction, portability or objection (including nomination and grievance redressal for Indian employees) regarding the processing of Personal Data, by sending an email to HRContactCentre@colt.net. For best practice and for security purposes a document that can identify you might be needed to attend your request.

Although at Colt, employment decisions are not based only on automated decision making, as a data subject you may have the right not to be subject to a decision based solely on automated processing.

You can also use any of the forms related to the right you wish to exercise available at <https://www.colt.net/legal/data-privacy/individual-rights/> attaching it to your request.

Additionally, you are able to **lodge a complaint** to the competent data protection authority. However, we take our obligations seriously, so if you have any questions or concerns, Colt would encourage you to raise them with us first, so that we can try to resolve them, for such purpose please send an email to HRContactCentre@colt.net.

Indian employees may also contact the Consent Manager for any consent preferences topics to assure that their consent preferences are accurately managed, and for grievance redressal in respect of any act or omission by the organization concerning personal data management. For contact details please send an email to gdpr@colt.net.

Furthermore, as a best practice complaints can also be sent by post clearly marked for the attention of the Global Data Protection Director, Colt Technology Services, Calle Telémaco 5, 28027, Madrid, Spain.

8. Colt Data Protection Officer and Contact details

Colt has appointed a Group Data Protection Officer, Alessandro Galtieri, who is also India Grievance Officer to whom you can contact at Colt Technology Services Group Limited Colt House | 20 Great Eastern Street | London | EC2A 3EH | UK or, via email at gdpr@colt.net, where you can also contact with the Data Protection team.

More information is available in [Data Protection \(sharepoint.com\)](#)

9. Updates to Colt Privacy Notice for employees

Colt may update this Privacy Notice from time to time to comply with regulatory matters and changes in legislation if applicable.

July 2024