

GC PARTNERS

Employee Privacy Notice

Policy

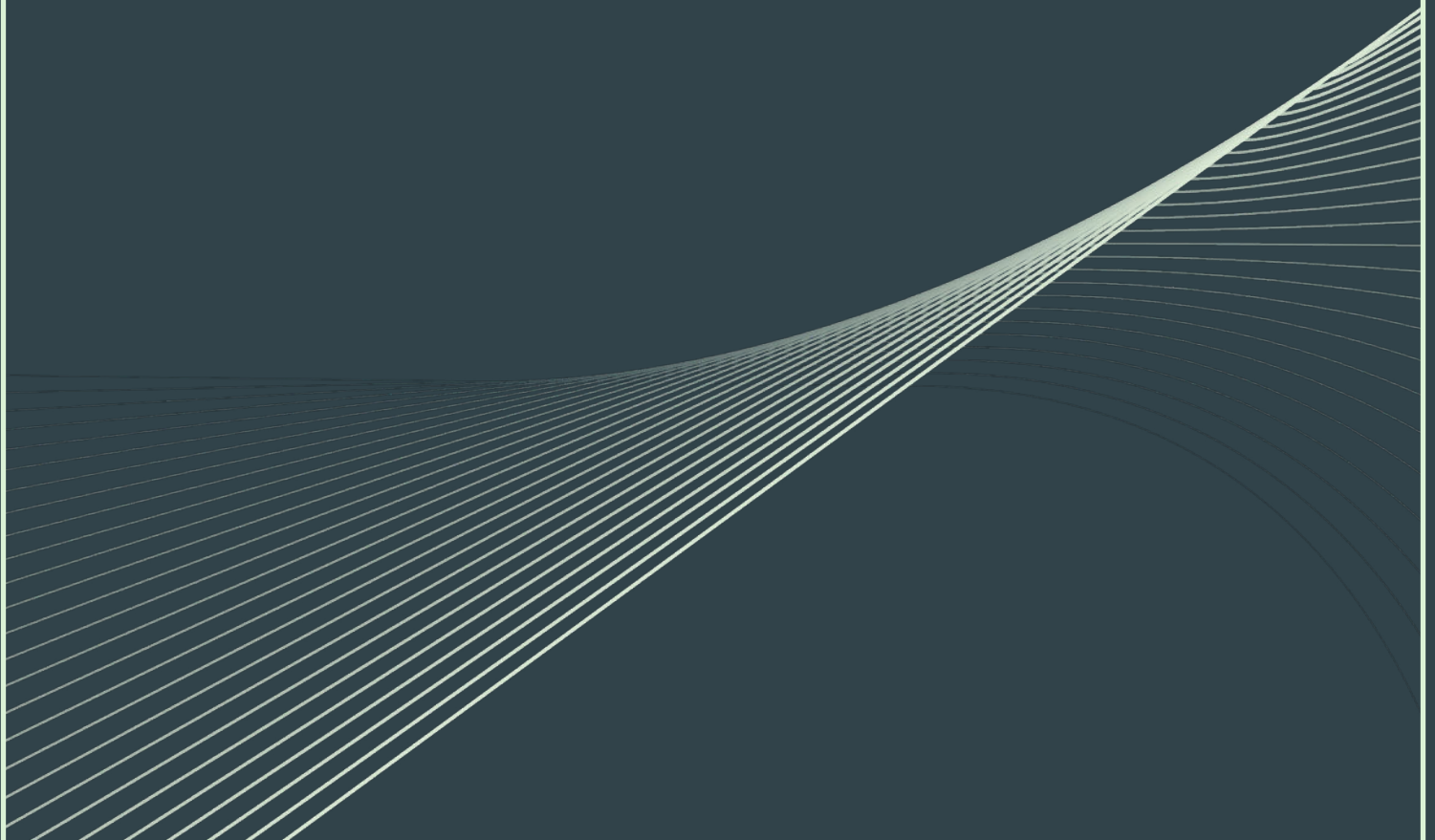


Table of Contents

Introduction	2
Data Protection Principles	3
How Your Personal Information is Collected	3
How We Use Your Data	3
What Data Do We Collect About You?	4
The Kind of Information We Hold About You	5
If You Fail to Provide Personal Data	6
Change of Purpose	6
How we Use Particularly Sensitive Personal Information	6
Our Obligations as an Employer	7
Do We Need Your Consent?	7
Information About Criminal Convictions	7
Automated Decision-Making	8
Data Sharing	8
How Long Will My Information be Retained For?	9
Rights of Access, Correction, Erasure, and Restriction	10
Updating Your Personal Data	11
Right to Withdraw Consent	12
Data Protection Officer	12
Changes to this Privacy Notice	12
Questions?	12
Complaints	12
Glossary	13

Introduction

GC Partners is committed to protecting the privacy and security of your personal data.

This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR).

It applies to all employees located in UK, Europe (EEA) and Dubai.

Global Currency Exchange Network Limited and Global Custodial Services Ltd both T/A GC Partners (GC Partners) is a “data controller” in respect of personal data. This means that we are responsible for deciding how we hold and use personal data about you. We are required under data protection legislation to notify you of the information contained in this privacy notice. This notice applies to current and former employees and this notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time.

It is important that you read this notice carefully because it contains important information about:

- Data Protection Principles
- How and why we collect, store, use and share your personal information.
- Your rights in relation to your personal information, and
- How to contact us and supervisory authorities in the event you have a complaint.
- Covid 19 Policy – Addendum 1 - Special requirements and how data is processed

It is important you read with notice together with any other data protection policies and we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

This privacy notice supersedes any other document that you may have seen regarding GC Partners’ handling of your personal data (including the Employee Handbook), although all non-conflicting terms of such documentation shall continue to apply.

If you have any concerns about how we process or protect your data or would like to contact us about any aspect of this Policy, please get in touch with our Data Protection Officer, who oversees our handling of Data, and who can be contacted at: compliance@gcpartners.co

Data Protection Principles

GC Partners will comply with data protection law. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way;
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- Relevant to the purposes that we have told you about and limited only to those purposes;
- Accurate and kept up to date;
- Kept only as long as necessary for the purposes we have told you about; and
- Kept securely.

How Your Personal Information is Collected

GC Partners collects personal data about employees through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies, disclosure & barring service, or other background check agencies.

We will collect additional personal data in the course of job-related activities throughout the period of you working for us, such as changes to your role, your performance, and any communications you have with us.

How We Use Your Data

GC Partners will only use your personal data when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the contract we have entered into with you;
- Where we need to comply with a legal obligation; or
- 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.

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest or for official purposes.

What Data Do We Collect About You?

We will collect the following types of information:

Types of Data	Description
Your Personal and Contact Details	<ul style="list-style-type: none"> • Personal contact details such as your name, title, addresses, telephone numbers, and personal email addresses • Date of birth • Gender • Marital status and dependents • Next of kin and emergency contact information • National Insurance number (or equivalent in Spain, Portugal etc) • Bank account details, payroll records and tax status information • Salary, annual leave, pension and benefits information • Start date • Location of employment or workplace • Copy of driving license. • 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) • Employment records (including job titles, work history, working hours, training records and professional memberships) • Remuneration history • Performance information • Disciplinary and grievance information • CCTV footage and other information obtained through electronic means such as swipe-card records • Information about your use of our information and communications systems • Photographs
Sensitive Information	<p>We may also collect, store and use the following “special categories” of more sensitive personal information:</p> <ul style="list-style-type: none"> • Information about your race or ethnicity, or religious beliefs • Information about your health, including any medical condition, health and sickness records.

The Kind of Information We Hold About You

We need all the categories of information in the list above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases, we may use your personal data to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests.

The situations in which we will process your personal information are listed below:

- Making a decision about your recruitment or appointment.
- Determining the terms on which you work for us.
- Checking you are legally entitled to work for us.
- Paying you and, if you are an employee, deducting tax and National Insurance contributions.
- Providing employee benefits such as pension, health insurance etc.
- Liaising with your pension provider.
- Administering your employment contract.
- Business management and planning, including accounting and auditing.
- Conducting performance reviews, managing performance and determining performance requirements.
- Making decisions about salary reviews and remuneration.
- 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 your contract with GC Partners.
- Education, training, and development requirements.
- Dealing with legal disputes involving you, or other employees, workers, and contractors, including accidents at work.
- Ascertaining your fitness to work.
- Monitoring and managing sickness absence.
- Administering your participation in any share plans or other incentive plans operated by any group company, including inviting you to participate in such plans.
- Complying with health and safety obligations.
- To prevent fraud.
- To monitor your use of our information and communication systems and our facilities.
- To ensure compliance with GC Partners Employee Handbook and any other GC Partners policies or guidance issued from time-to-time.
- To ensure network and information security, including preventing unauthorised access to GC Partners computer and electronic communications systems and preventing malicious software distribution.
- Equal opportunities monitoring.
- To provide training and support to you.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If You Fail to Provide Personal Data

If you fail to provide certain data when requested, GC Partners may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our employees).

Change of Purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required by contract or permitted by law.

How We Use Particularly Sensitive Personal Information

“Special categories” of particularly sensitive personal information require higher levels of protection. GC Partners needs to have further justification for collecting, storing, and using this type of personal data. We may process special categories of personal information in the following circumstances:

- In limited circumstances, with your explicit written consent.
- Where we need to carry out our legal obligations and in line with this privacy notice and/or our Employee Handbook.
- Where it is needed in the public interest (e.g., for equal opportunities monitoring) and in line with this privacy notice and/or our Employee Handbook.
- Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.
- Where it is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the controller or the data subject in connection with employment, social security, or social protection.
- Where you volunteer the information to us.

Less commonly, GC Partners 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 may also process such information about existing or former staff members in the course of legitimate business activities with the appropriate safeguards.

Our Obligations as an Employer

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

- We will use information relating to leaves of 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.
- To ensure meaningful equal opportunity monitoring and reporting in accordance with legal requirements. For all employees we may use information about your race or ethnic origin (as well as gender) on an anonymised basis wherever possible, to ensure equal opportunities.

Do We Need Your Consent?

We do not need your consent if we use special categories of your personal data in accordance with this privacy notice and/or Employee Handbook to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

Information About Criminal Convictions

GC Partners may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided, we do so in line with this privacy notice and/or our Employee Handbook.

- Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary 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 may also process such information about existing or former staff members in the course of legitimate business activities with the appropriate safeguards.

We do not envisage that we will hold information about criminal convictions, save in relation to FCA or PRA or other regulatory requirements.

Automated Decision-Making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. Within GC Partners we do not make any automated decision-making, however we are allowed to use automated decision-making in the following circumstances:

- Where we have notified you of the decision and given you 21 days to request a reconsideration
- Where it is necessary and appropriate to perform the contract with you.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making unless we have a lawful basis for doing so and we have notified you.

We may decide to take decisions about you using automated means in relation to online tests for promotion purposes in the future. We will notify you in writing if this position changes and we will detail and communicate this processing if applicable. If you would like to be able to understand the logic behind these tests you can contact us.

Data Sharing

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

The parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

How Long Will My Information Be Retained For?

We will only retain your personal data as follows (each period commencing from the date your data was received unless otherwise stated):

Types of Data	Typical Retention Time	Information
Employment Data	<p>Seven years from the date your employment ends with the following exceptions:</p> <ul style="list-style-type: none"> • References received: 1 year • Payroll and tax information: 6 years • Sickness records: 3 years • Annual leave records: 2 years • Unpaid leave/special leave records: 3 years • Annual appraisal/assessment records: 5 years • Records relating to promotion, transfer, training, disciplinary records: 1 year from the end of your employment • References given: 5 years from reference/end of employment references to be provided • Summary of record of service (e.g., name, position held, duration of employment: 10 years from end of employment • Records relating to accidents at work: 12 years 	<p>We will only continue to retain this Data where this is:</p> <ul style="list-style-type: none"> • Legally required under tax legislation or other regulations; or • Required to exercise or defend our legal rights

All other personal data held about you will only be retained 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. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. In some circumstances, we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee or staff member of the company we will retain and securely destroy your personal information in accordance with our data retention policy and applicable laws and regulations.

Rights of Access, Correction, Erasure, and Restriction

Your rights

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

Your Rights	How to Exercise Your Rights
Right to access and receive a copy of the Data we hold about you.	It is generally free for you to request access to your Data. If your request is repetitive or excessive, we may refuse to comply or we may charge you a fee. More information can be found here .
Right to correct any inaccurate Data we hold about you.	You can amend, correct, delete or edit details by contacting our People team.
<p>Right to require us to erase your Data if (for example):</p> <ul style="list-style-type: none"> (i) we no longer need the Data for the purpose we originally collected it for; (ii) we only collected it with your consent, and you now withdraw your consent; or (iii) you object to how we are Processing your Data. 	You can request erasure of your Data by contacting our People team. Or be emailing the Data Protection Officer. This process is not reversible.
<p>Right to request that we restrict the Processing of your Data if (for example):</p> <ul style="list-style-type: none"> (i) you believe that the Data we hold on you is inaccurate; (ii) you have the right to request that we erase your Data but would prefer us to restrict our Processing instead; or (iii) we no longer need the Data for the purpose we originally collected it for, but you require the Data for legal actions. 	<p>You can request the restriction of Processing of your Data by contacting our People team.</p> <p>Once you have requested this you can change your mind at any time by contacting us again.</p>

Right to request a copy of the Data we hold on you in a structured, commonly used and machine-readable format. You can also request that we transfer this to a third party on your request. Please note that this right may not apply to all of your Data.	In some circumstances, you can request the transfer of your Data to a third party by email to compliance@gcpartners.co . The request must include which Data you would like to be transferred, to whom it should be transferred and by which method.
Right to object to our Processing of your Data. Please note that in some cases, we may demonstrate that we have legitimate grounds to Process your information which overrides this right.	You can object to Processing of your Data by contacting our People team. Once you have objected you can change your mind at any time by contacting us again.
Right to not be subject to a decision based solely on an automated process, such as profiling, which results in you being significantly affected or produces legal effects concerning you.	You can exercise this right by contacting our People team.

If you want to exercise any of the rights detailed above, review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact the Data Protection Officer in writing at compliance@gcpartners.co or by completing the relevant sections of the webforms located on our customer facing sites.

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). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

You will not have to pay a fee to access your personal data (or to exercise any of the other 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.

Please be aware that the rights above are not absolute and there may be circumstances where we are unable to comply with your request. In such cases we will explain why we cannot comply with the request.

Updating Your Personal Data

Your duty to inform us of changes - It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us. (such as your name, address, bank details).

Right to Withdraw Consent

In the limited circumstances where you may have provided your consent to the collection, processing, and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the person that you provided your consent to (or the person now occupying that role). Once we have received notification that you have withdrawn your consent, we will no longer process your data for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Data Protection Officer

We have appointed a Data Protection Officer (DPO) to oversee compliance with data protection across the GC Partners group. If you have any questions about this privacy notice or how we handle your personal data, please contact either your line manager or the DPO at:

compliance@gcpartners.co

Changes to This Privacy Notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

Questions?

If you have any questions or comments about this Policy, want to know more about how we use your Data, or want more information on your rights, please contact our DPO by emailing:

compliance@gcpartners.co

Complaints

If you have a complaint about how we process your data, please contact us at compliance@gcpartners.co and will try to resolve this. However, if you feel that we have not addressed your concern in a satisfactory manner, you have the right to ultimately complain to the Information Commission ("ICO") (www.ico.org.uk).

This policy was last reviewed and updated in April 2021.

Glossary

Term	What This Means
Data	Information relating to an identifiable person, who can be directly or indirectly identified in particular by reference to an identifier, or which is otherwise defined as 'Personal Data' under Data Protection Legislation.
Data Protection Legislation	Data Protection Act 2018, EU General Data Protection Regulation 2018 (GDPR), the Privacy and Electronic Communications (EC Directive) Regulations 2003, and any other applicable laws relating to the protection of Data.
Process, Processing or Processed	Accessing, collecting, obtaining, recording, holding, disclosing, using, altering, deleting, erasing, or destroying Data, or carrying out any operation(s) on the Data or as otherwise defined under applicable Data Protection Legislation.