

Staff Privacy Notice

1. INTRODUCTION

Hampden & Co plc ('the Bank', 'we', 'us') are committed to protecting the privacy and security of your personal information.

This Staff Privacy Notice (the 'notice' or 'privacy notice') describes how we collect and use personal information about you before, during and after your working relationship with us and it applies to all current, potential and former employees, directors, work experience/student placement, other workers and contractors of the Bank ('staff', 'you'). It applies whether the work is zero hours, part time or full time; or permanent, temporary or for a fixed term. It is important that you read this notice and the associated appendix, together with any other privacy notices 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. We recommend you keep a copy of these notices.

If you have applied for a position with us through our websites, then you should also read our 'Website Privacy Notice' at www.hampdenandco.com and/or www.hampdendigital.com.

We are a data "controller" which means that we are responsible for deciding how we hold and use personal information about you.

You can contact us at:

Hampden & Co plc, 9 Charlotte Square, Edinburgh, Scotland, EH2 4DR, or by email at contact@hampdenandco.com, or by calling us on 0131 226 7300.

We are required under data protection legislation to notify you of the information contained in 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.

This notice does not form part of your contract of employment or other contract to provide services to the Bank.

Data protection principles

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

1. Used lawfully, fairly and in a transparent way;
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is

incompatible with those purposes;

3. Relevant to the purposes we have told you about and limited only to those purposes;

4. Accurate and kept up to date;

5. Kept only as long as necessary for the purposes we have told you about;

6. Kept securely.

2. YOUR PERSONAL INFORMATION

In this privacy notice, 'your personal information' means your personal data i.e. information about you from which you can be identified. The appendix to this notice lists 'your personal information' that we may collect and process. It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

You may also provide us with information about other people connected to you such as your dependents. Please ensure that you know they agree, or that you are otherwise allowed to give us this information.

Special Categories of Personal Information

'Special categories of personal information' means information about you that is sensitive or intrinsically private. This includes your racial or ethnic origin; political opinions; 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 of uniquely identifying you. Data marked * in the appendix to this notice falls within these 'special categories' or might disclose special categories of personal information.

We must have additional legal grounds for processing special categories of personal information and these are set out in the appendix to this notice.

3. HOW YOUR PERSONAL INFORMATION IS COLLECTED

We collect personal information about you through the application and recruitment process, either directly from you or sometimes from an employment agency. We may sometimes collect additional information from third parties including former employers, credit reference agencies and other background check agencies.

We collect additional personal information about you throughout the period of you working for us. This information will come from you or us, professional and government bodies, credit reference agencies and other background check agencies. It may also come from other sources such as medical professionals who may provide us with information about your health; our clients who may provide us with information about your performance in the role and third parties who provide services to us such as payroll processing.

Some of the sources above will only be relevant in certain circumstances, or if you have applied for a particular role. If you would like more information on the source of your personal information please contact the HR Department.

4. HOW WE PROCESS YOUR PERSONAL INFORMATION

We will only process your personal information when the law allows us to. Most commonly, we will process your personal information in the following circumstances:

1. To enter into, or to perform the contract we have entered into with you; or
2. Where we need to comply with a legal obligation that applies to us; or
3. 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.

The appendix to this notice details where the above legal bases are used, alongside the personal information and the relevant situations in which we will use your personal information.

Data security

We have put in place appropriate security measures to prevent your personal information 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 staff 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. Details of these measures may be obtained from the HR Department or the Data Protection Officer.

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.

If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application, we will not be able to process your application successfully. For example, if we require to complete identity, financial, criminal record and other pre-employment screening checks, including reference checks, and you fail to provide relevant details we will be unable to take your application further.

In some circumstances, the provision of your personal information is a statutory requirement. This includes, for example, evidence of qualifications or work history or documentation confirming your right to work in the UK – if you don't provide this, we will not be able to enter into a contract with you, or we may need to terminate your contract.

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In other cases, if you fail to provide certain information when requested, we may not be able to enter into or 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 staff).

Automated decision making

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.

Change of purpose

We 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 information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

5. DATA SHARING WITH THIRD PARTIES

We share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so. All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies.

Our service providers

We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions. We may share your data with:

People who support services we provide

- third parties who help us provide our services to you, such as our payroll processors and insurers, who are bound to keep such information secure and confidential;
- payment processing service providers;
- organisations or agencies who host or maintain data centres, service platforms and other infrastructure and systems on our behalf, where your personal information is processed and/or stored; and
- our professional advisers, for example our auditors.

People we have obligations to give it to

- UK tax authorities and other government agencies;
- UK and overseas regulators and authorities in connection with their duties;
- when we are required to comply with (i) a court order, (ii) a request from a law enforcement agency or (iii) other legal obligations;
- when there is a public duty to disclose information for example law enforcement and professional bodies;
- to comply with anti-money laundering legislation;
- when it is necessary to prevent bribery, fraud, terrorist financing and money laundering;
- to meet our obligations under the sanctions compliance regime; and
- in the event of an emergency, the emergency services.

People you want us to give it to

- to provide a reference regarding you to support employment, mortgage or tenancy applications; and
- other instances when you have provided consent.

We may also share your information for our legitimate interests

- in the event that we sell or buy any of our business or assets, in which case we may disclose your personal information to the prospective seller or buyer of such business or assets, or to anyone funding the sale or purchase of such business or assets regardless of whether the sale or purchase is completed; and
- to protect our rights, property, or safety of you and our other employees, clients or others.

6. HOW WE WORK WITH IDENTITY VERIFICATION, CREDIT REFERENCE AND FRAUD PREVENTION AGENCIES

Identity Verification Agencies and Credit Reference Agencies

In order to process your application, we may perform identity and credit checks about you using Identity Verification Agencies and Credit Reference Agencies who supply us with identity information, as well as information about you from the Electoral Register, in order to verify your identity. Our search is not seen or used by lenders to assess your ability to obtain credit but a record is retained by the agency whether or not your application proceeds.

Fraud Prevention Agencies

The personal information we have collected from you will be shared with Cifas who will use it to prevent fraud, other unlawful or dishonest conduct, malpractice, and other seriously improper conduct. If any of these are detected you could be refused certain services or employment. Your personal information will also be used to verify your identity. Further details of how your information will be used by us and Cifas, and your data protection rights, can be found in the Bank's Fitness & Propriety Policy.

Information about criminal convictions

To enable us to make recruitment decisions, assess your suitability for particular work and conduct ongoing assessments as to your fitness and propriety, we process information about criminal convictions and offences (including alleged offences).

Information about the checks we undertake can be found in the Bank's Fitness & Propriety Policy. Please refer to that Policy for further details.

7. TRANSFERRING INFORMATION OUTSIDE THE EUROPEAN ECONOMIC AREA

We, our payment agency or third parties acting on our behalf, may transfer your personal information outside the European Economic Area (EEA). We will protect your personal information in accordance with the standards set out under the General Data Protection Regulation. We do this by including strong undertakings in the contracts we put in place with those relevant parties.

Additionally, we and other organisations we work with may access and use information recorded by fraud prevention agencies from other countries.

8. HOW LONG WE KEEP YOUR PERSONAL INFORMATION FOR

Once your contract with us ends, we will keep your information for a period of at least 6 years thereafter, or longer if required by law or regulation, to allow us to establish, exercise or defend legal claims, with the exception of the following:

1. We delete emergency contact details when your engagement terminates;
2. If your application for employment does not proceed, we keep your information for no longer than a period of 12 months. This is for our legitimate interests to enable us to reconsider your application and (if appropriate) contact you, if the position you applied for becomes available again.

If you ask us to retain your personal information so that we can contact you to discuss future work opportunities, we will write to you separately, to obtain your explicit consent to retain your personal information for a fixed period of one year on that basis.

9. YOUR RIGHTS

Under certain circumstances, by law you have the right in connection with your personal information to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it or if we must delete the data to comply with a legal obligation. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it. Where this right is validly exercised, we may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.
- **Request the transfer** of your personal information to you or another party if our processing is based on your consent or is necessary to carry out our contract with you and is carried out by automated means.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact your line manager or the HR Department in the first instance.

No fee usually required

You will not have to pay a fee to access your personal information (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.

What we may need from you

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.

10. CONTACTING OUR DATA PROTECTION OFFICER

We have appointed a Data Protection Officer (DPO) to oversee compliance with this privacy notice and with data protection legislation. If you have any questions about this privacy notice or how we handle your personal information, which cannot be adequately addressed through your usual reporting lines, please contact the DPO at dpo@hampdenandco.com.

We aim to address all queries and resolve all complaints internally via the HR Department and our DPO but 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.

Hampden & Co plc - Appendix to Staff Privacy Notice

Data marked * in the table below is either classified as ‘special categories of personal information’ or might disclose ‘special categories of personal information’. We must have additional legal grounds for processing special categories of personal information – these are listed in the middle column of the table.

Reason for processing your personal information	Legal basis for processing, and legitimate interest (where applicable)	Your personal information
<p>1. Recruitment</p> <ul style="list-style-type: none"> • Make decisions about your recruitment and appointment including assessing your skills, qualifications, fitness & propriety and suitability and eligibility for the work • Consider reasonable adjustments to the recruitment process for disabled applicants • Carry out equal opportunities monitoring • Evidence fair recruitment processes and allow us to deal with any disputes 	<p>To enter a contract To comply with a legal obligation</p> <p>For our legitimate interests:</p> <ul style="list-style-type: none"> • to select suitable employees, directors, workers and contractors • Compliance with regulatory requirements <p><u>*For special categories of information:</u></p> <p>For our legitimate interest in order to:-</p> <ul style="list-style-type: none"> • select suitable employees, workers, directors and contractors • assess fitness and propriety to discharge duties effectively on an ongoing basis in accordance with regulatory requirements • to exercise or perform employment law rights or obligations. 	<ul style="list-style-type: none"> • Personal contact and identifier details (such as name, address, email, telephone number, date and place of birth, gender, national insurance number) • Your application form, CV and other information prepared and obtained during the recruitment process such as competency assessments, equal opportunities data and your offer letter • Information about a disability, the effects of that disability, and adjustments that may need to be made to the recruitment process as a result of that disability* • Marriage or civil partnership status* <p>If you accept an offer of employment:</p> <ul style="list-style-type: none"> • Information regarding background checks and associated documentation and information to: <ul style="list-style-type: none"> • verify your identity, CV, previous employment records, credit record (such as bank and/or mortgage/credit card statements) and right to work in the UK; • identify any criminal convictions and offences (including alleged offences)*; • Your contract with us

Reason for processing your personal information	Legal basis for processing, and legitimate interest (where applicable)	Your personal information
<p>2. Your employment with the Bank</p> <ul style="list-style-type: none"> • Administer your contract, monitor compliance thereof, deal with disputes • Manage your performance, conduct, fitness and propriety and make decisions about your employment and rewards • Manage health and safety requirements, work patterns and if appropriate, consider disability status and reasonable adjustments for disabled workers • Pay you, provide benefits on your behalf, comply with pensions obligations and reimburse you for business expenditure • Inform your contacts in the event of sickness, accident or other emergency or you in the event of a business emergency • Make arrangements for the termination of our working relationship • Manage and promote our business or related businesses, share information and social news • Carry out equal opportunities monitoring 	<p>To carry out the contract</p> <p>To comply with a legal or regulatory obligation</p> <p>For our legitimate interests:</p> <ul style="list-style-type: none"> • Business management and planning • Accounting and auditing • Ensure a suitable workforce • Ensure compliance with our policies and procedures <p><u>*For special categories of information:</u></p> <ul style="list-style-type: none"> - To exercise or perform employment law rights or obligations - To review equality of opportunity or treatment - For the purposes of preventative or occupational medicine or for assessment of your working capacity -To process benefits eg parental leave -For our legitimate interests to:- <ul style="list-style-type: none"> - retain suitable employees, workers, directors and contractors - assess fitness and propriety to discharge duties effectively on an ongoing basis in accordance with regulatory requirements - to be informed in the event of sickness, accident or other emergency. 	<p>In addition to the above:</p> <ul style="list-style-type: none"> • Details of job titles and duties, work history, contract history • Health data and sickness records, including pregnancy and disability information* • Work pattern, holiday and other absence records including information regarding requests for flexible working and time off work (such as bereavement, jury service, parental leave)* • Performance, appraisal, your standards of compliance, professional qualifications and training & competence records including information relating to disciplinary and grievance investigations and proceedings • Information on background checks to confirm on going fitness and propriety including personal and business relationships which may give rise to conflicts of interest • Payroll and wage records, compensation history, salary and benefits details, including pension and discretionary variable reward details and tax, national insurance and student loan information • Bank account details and payment records • Resignation information including exit interviews • If relevant, redundancy information, including pooling data, selection matrixes, consultation notes, correspondence • Dependants* and details of other emergency contacts • Photographs of you

Reason for processing your personal information	Legal basis for processing, and legitimate interest (where applicable)	Your personal information
<p>3. Monitoring your activity whilst on our premises; and</p> <p>Monitoring your use of our IT and communications systems</p>	<p>For our legitimate interests:</p> <ul style="list-style-type: none"> • Ensure compliance with our legal and regulatory requirements, our policies and procedures • Notify our insurers, regulators and other interested parties • Manage complaints or legal claims • Protect our business information • To keep our premises safe and secure and ensure compliance with our confidentiality obligations to clients • Ensure network and information security, including checking for viruses, preventing unauthorised access to our information and communication systems, preventing malicious software distribution, or to find or retrieve lost messages • Prevent and detect fraud and other criminal activity • Verify the identity of individuals accessing our premises • Service the needs of clients 	<ul style="list-style-type: none"> • Information about your use of our information and communication systems, and emails passing through our systems (more detail on this can be found in our Operational Risk, Acceptable Use and Information Security policies) • Correspondence to and from you (electronic or otherwise) and telephone voicemail messages during times when you are absent from the workplace • Location information gained from your use of the Bank’s mobile phone, computer equipment and door security tokens. This is extended to personal devices where you are accessing Bank systems under the Bring Your Own Device (BYOD) Policy • Closed circuit television (CCTV) images and photographs of you

Reason for processing your personal information	Legal basis for processing, and legitimate interest (where applicable)	Your personal information
<p>4. Once you have left employment</p> <p>(can also occur during employment)</p> <ul style="list-style-type: none"> • Provide a reference regarding you for employment 	<p>To comply with regulatory obligations</p> <p>For the legitimate interests of the organisation that is requesting the reference:</p> <ul style="list-style-type: none"> • To select suitable employees, directors, workers and contractors 	<p>For non-regulated roles the information provided:</p> <ul style="list-style-type: none"> • Your name • Work location • Dates of employment • Position held • Job title • Type or duration of contract <p>For regulated roles the information provided:</p> <ul style="list-style-type: none"> • Your name • National Insurance Number • Work location • Dates of employment or service • Details of Controlled/ Senior Management/Certified Functions • Position held • Job title • Regulatory responsibility (including details of any conditions, suspensions, limitations, restrictions or time limits) • Information relating to disciplinary and grievance investigations and proceedings (including details of formal written warnings, suspension or dismissal, reduction or recovery of any remuneration) • Details of Fitness & Propriety (including, if appropriate, conduct breaches reported to Regulators)

Reason for processing your personal information	Legal basis for processing, and legitimate interest (where applicable)	Your personal information
<p>5. Dealing with an emergency medical or safety incident</p>	<p>To protect your vital interests or those of another person</p> <p><u>*For special categories of information:</u> To protect the vital interests of you or another person if you are incapable of giving consent</p>	<ul style="list-style-type: none"> • Your personal identifier details • Your health information • Incident details • Emergency contact details

Reason for processing your personal information	Legal basis for processing, and legitimate interest (where applicable)	Your personal information
<p>6. Ad Hoc requests from you</p> <p>For example :</p> <p>To provide a reference regarding you to support mortgage or tenancy applications (at your request and with your prior approval)</p>	<p>To comply with regulatory obligations</p> <p>For the legitimate interests of the organisation that is requesting the reference:</p> <ul style="list-style-type: none"> • To select suitable mortgage applicants or tenants 	<ul style="list-style-type: none"> • Your name • Work location • Dates of employment • Position held • Job title • Type or duration of contract • Core working hours (for tenancy references) • Salary details