

Privacy Notice

1. Purpose

- a. Buildots UK Limited (“**Buildots**” or “**we**”, “**us**”) is committed to protecting your privacy.
- a. This employee privacy notice (the “**Notice**”) describes how we collect and use Personal Data (as defined below) about you during and after your working relationship with us, in accordance with the EU General Data Protection Regulation 2016/679 (“**GDPR**”) and the UK Data Protection Act 2018, as well as the GDPR as it forms part of the law of England and Wales, Scotland and Northern Ireland (“**UK GDPR**”). This Notice applies to all employees, candidates, workers and contractors. This Notice does not form part of any contract of employment or other contract to provide services.
- b. Buildots is the “controller” of your Personal Data under the GDPR and/or UK GDPR, as applicable. This means that we are responsible for deciding how we hold and use your Personal Data. We are required under the GDPR and/or UK GDPR, as applicable, to notify you of the information contained in this Notice.
- c. It is important that you read this Notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing Personal Data about you, so that you are aware of how and why we are using that information and what your rights are under the data protection legislation.

2. The types of Personal Data we collect about you

“**Personal Data**” means any information about an individual from which that person can be identified. It does not include data from which the person’s identity has been removed (anonymous data).

We may collect, store and use the following categories of Personal Data about you:

- a. Personal contact details such as name, title, addresses, telephone numbers and personal email addresses;
- b. Date of birth;
- c. Gender;
- d. Marital status and dependents; next of kin and emergency contact information;
- e. Nationality and National Insurance number;
- f. Financial and salary information, including bank account details, payroll records and tax status information, salary, annual leave, pension and benefits information, compensation history.
- g. Employment records (including job titles, work history, working hours, holidays, training records and professional memberships); performance information; start date and, if different, the date of your continuous employment; leaving date and your reason for leaving; location of employment or workplace; disciplinary and grievance information.

- h. 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).
- i. CCTV footage and other information obtained through electronic means such as swipe card records.
- j. Information about your use of our information and communications systems.
- k. Photographs.

We may also collect, store and use the following more sensitive types of Personal Data of special categories, such as information about your health, including medical condition and sickness records, biometric data.

How we collect your Personal Data?

- l. We collect Personal Data about employees, candidates, workers and contactors through the application and recruitment process, either directly from candidates or from public sources or from third parties such as human resources platforms and recruitment agencies. We may sometimes collect additional information from third parties including former employers.
- m. We will collect additional Personal Data in the course of job-related activities throughout the period of you working for us.

3. How we use your Personal Data?

- a. We will only use your Personal Data when the law allows us to. Most commonly, we will use your Personal Data in the following circumstances:
 - i. Where we need to perform the contract we have entered into with you;
 - ii. Where we need to comply with a legal obligation; and/or
 - iii. Where it is necessary for legitimate interests pursued by us or a third party and your interests and fundamental rights do not override those interests. Such legitimate interest may be, for example, recruitment of personnel, handling career applications or other ongoing HR purposes.
- b. The main situations in which we will process your Personal Data are listed below. We have indicated the main purposes for which we are processing or will process your Personal Data, as well as providing a description of which categories of data are involved.
 - i. We may use your Personal Data, including recruitment information, employment records and financial information for administering the contract we have entered into with you.
 - ii. We may use your communication details to communicate with you. We do so where it is necessary for our legitimate interests (to provide information to you regarding your employment), if we have obtained your prior consent, or for entering into or performing our contract with you.

- iii. We may use your recruitment information or your employment records when making a decision about your employment and the terms on which you work for us, including recruitment, appointment, continued employment, promotion, termination etc., as well as for conducting performance reviews, managing performance, determining performance requirements, and assessing qualifications for a particular job or task. We do so where it is necessary for our legitimate interests (recruitment of personnel and ongoing HR purposes).
- iv. We may use your financial information to determine whether your engagement is deemed employment for the purposes of Chapter 10 of Part 2 of the Income Tax (Earnings and Pensions) Act 2003 (ITEPA 2003) and providing you with a status determination statement in accordance with the applicable provisions of ITEPA 2003. We do so to comply with a legal obligation.
- v. We may use your financial information for paying you and, if you are an employee or deemed employee for tax purposes, deducting tax and National Insurance contributions (NICs). We do so to comply with a legal obligation.
- vi. We may use your financial information for enrolling you in a pension arrangement in accordance with our statutory automatic enrolment duties, liaising with the trustees or managers of a pension arrangement operated by us, your pension provider and any other provider of employee benefits. We do so to comply with a legal obligation and to perform our contract with you.
- vii. We may use your employment records and financial information when making decisions about salary reviews and compensation. We do so to perform our contract with you and where it is necessary for our legitimate interests (to compensate our employees).
- viii. We may use your employment records, CCTV footage and information about your use of our information and communications systems when gathering evidence for possible grievance or disciplinary hearings (gross misconduct) or in order to prevent fraud. We do so based on our legitimate interest (to defend and enforce our legal rights, to protect our and our staff's health, safety and property, and to protect and ensure the continuous operation of our business) and to comply with a legal obligation.
- ix. We may use data regarding your use of our information and communications systems and monitor your use of our information and communication systems to ensure compliance with our internal policies, to ensure network and information security, including preventing unauthorized access to our computer and electronic communications systems and preventing malicious software distribution, and to investigate potential wrongdoings. We do so based on your consent, based on our legitimate interest (to defend and enforce our legal rights and to protect and ensure the continuous operation of our business) or to comply with a legal obligation.
- x. We may use your Personal Data when dealing with legal disputes involving you, or other employees, candidates, workers and contractors, including accidents at work. We do so based on our legitimate interest (to defend and enforce our legal rights).

- xi. If you are a candidate, we may use your recruitment information to assess your skills, qualifications, suitability for the work, and decide whether to enter into a contract with you. We may also use your contact details to communicate with you. We do so where it is necessary for our legitimate interests (recruitment of personnel, handling career applications and communicating with you) or where it is necessary in order to take steps prior to entering into a contract with you.
 - xii. We may use your Personal Data in connection with the operation or administration of any share incentive plans or other incentive arrangements which are adopted by Buildots or any member of its group, including but not limited to the Buildots 2019 Share Option Incentive Plan, the Buildots Company Share Option Plan and the Buildots 2020 EMI Share Option Plan.
- c. Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your Personal Data.
- d. If you fail to provide certain information when requested, we 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 and workers).
- e. We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason which is compatible with the original purpose. If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
- f. Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.
- g. In general, we will not process Personal Data of special categories about you unless it is necessary for performing or exercising obligations or rights in connection with employment. On rare occasions, there may be other reasons for processing, such as it is in the public interest to do so. For example, we may process your health information if we need to process this information to exercise rights and perform obligations in connection with your employment, ensure your, and other members of the staff's, health and safety and your fitness to work, and monitor and manage sickness absence.
- h. If you are a candidate and fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully.

4. **Data sharing**

- a. We may have to share your Personal Data with third parties, including third-party service providers and other entities in the Buildots group. We will share your Personal Data 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. Such third parties may include, for example, human resources platforms, payroll services providers, IT services, and pension administration.

- b. We will share personal data relating to your participation in any share or option plans operated by us or any company in the Buildots group with third party administrators, nominees, registrars and trustees, and with other companies in the Buildots group, for the purposes of administering such share or option plans.
- c. We may also share your Personal Data with other third parties, for example in the context of the possible sale or restructuring of the business. In this situation we will, so far as possible, share anonymized data with the other parties before the transaction completes. Once the transaction is completed, we will share your Personal Data with the other parties if and to the extent required under the terms of the transaction.

5. **Cross-border data transfers**

- a. We may transfer your Personal Data to countries outside the UK, that do not necessarily provide the same level of data protection as the country in which you reside and are not recognized as providing an adequate level of data protection.
- b. Our transfers of Personal Data outside of the UK are done for the performance of a contract or implementation of pre-contractual relations with you, based on your consent, an adequacy decision or subject to safeguards that ensure the protection of your Personal Data, such as standard contractual clauses approved by the UK Information Commissioner.
- c. For further information on the protective measures that we take in connection with cross-border transfers of Personal Data, please contact dpo@istormsolutions.co.uk

6. **Data retention**

- a. We will only retain your Personal Data for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting or reporting requirements.
- b. To determine the appropriate retention period for Personal Data, we consider, inter alia, the amount, nature and sensitivity of the Personal Data; the potential risk of harm from unauthorized 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. For more details on the retention periods of your Personal Data, please contact dpo@istormsolutions.co.uk
- c. In some circumstances, we may anonymize your Personal Data so that it can no longer be associated with you, in which case we may use that information without further notice to you. Once you are no longer an employee, candidate, worker or contractor of the company, we will retain and securely destroy your Personal Data in accordance with applicable policies, laws and regulations.

7. **Your rights**

- a. It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during your working relationship with us.

- b. Under certain circumstances, by law you have the right to:
- i. Request access to your Personal Data (commonly known as a data subject access request). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.
 - ii. Request correction of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
 - iii. Request erasure of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have exercised your right to object to processing (see below).
 - iv. Object to processing of your Personal Data 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 Data for direct marketing purposes.
 - v. Request the restriction of processing of your Personal Data. This enables you to ask us to suspend the processing of Personal Data about you, for example if you want us to establish its accuracy or the reason for processing it.
 - vi. Request the transfer of your Personal Data to another party.
- c. If you want to exercise any of the above rights, please contact dpo@istormsolutions.co.uk or write to us at 7 Whitehall Buildings, Alderminster, Stratford-upon-Avon, CV37 8BW.
- d. 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 a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it.
- e. 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 Yakir Sudry at yakir@buildots.com. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

8. **Data Protection Officer (DPO)**

We have appointed a Data Protection Officer (DPO) to oversee compliance with this Notice. If you have any questions about this Notice or how we handle your Personal Data, please contact the DPO at dpo@istormsolutions.co.uk. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO) with respect to data protection issues.

9. **Changes to this Notice**

We reserve the right to update this 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 Data.

10. **Contact details**

If you have any questions about this Notice, please contact dpo@istormsolutions.co.uk