



EMPLOYEE DATA PRIVACY NOTICE

1. WHAT IS THIS?

- 1.1. At Saint-Gobain we take the privacy of our workforce seriously and we are committed to protecting it.
- 1.2. In our commitment to protecting your privacy, we aim to comply at all times with the EU General Data Protection Regulation 2016 and, once effective, the Data Protection Act 2018, in the UK and the Data Protection Act 2018, in the Republic of Ireland, expected in mid-2018 (together, the “**GDPR**”)
- 1.3. This privacy notice is designed to provide information on how each of the Saint-Gobain companies and trading names (“**Businesses**”) (referred to as “we”, “us”, “our”) in the UK and Ireland processes the personal data of its workforce (referred to as “you”, “your”) in accordance with the GDPR. A list of each of the Saint-Gobain UK and Ireland companies and Businesses is set out in the Schedule to this Privacy Notice.
- 1.4. This notice applies to current and former members of our workforce, including employees, workers, agency workers, contractors and self-employed consultants.
- 1.5. For the purposes of the GDPR, the Company and Business by whom you are employed is the data controller of your personal data. As a “data controller”, we are responsible for deciding how we process personal data about you. We are fully committed to protecting your personal data at all times. We will only process your personal data in accordance with applicable data protection laws, adhering to the principles (as applicable) contained in the GDPR.
- 1.6. This Privacy Notice may be amended from time to time to reflect any changes in the way in which we process your personal data. We will provide you with a new privacy notice when we make any substantial updates, and we may also notify you in other ways from time to time about the processing of your personal data. Please check these links occasionally to ensure that you are happy with any changes:
For the UK: <http://www.saint-gobain.co.uk/employeedataprivacy> or
For Ireland: <http://www.saint-gobain.ie/employeedataprivacy>
- 1.7. This privacy notice was last updated on 14 November 2018.

2. THE KIND OF INFORMATION WE HOLD ABOUT YOU

- 2.1. “Personal data” is any information about a living individual from which they can be identified. It does not include data where any potential identifiers have been removed (anonymous data) or data held in an unstructured file.
- 2.2. There are “special categories” of more sensitive personal data which require a higher level of protection.
- 2.3. When we refer to “processing”, this means anything from collecting, using, storing, transferring, disclosing, altering or destroying personal data.
- 2.4. For comprehensive definitions of the above, please refer to the General Delegation UK & Ireland Data Protection Policy which is available at <http://staging.portalng.saint-gobain.com/web/gbr/gdpr>

3. RECEIVING YOUR PERSONAL DATA

- 3.1. We may obtain personal data and/or special category personal data about you from third party sources, such as recruitment agencies, job boards, behavioural, training providers, professional assessors, occupational health professionals, and background check providers. Where we receive such information from these third parties, we will only use it in accordance with this privacy notice and in line with the General Delegation UK & Ireland Data Protection Policy. In some cases, they will be acting as a controller of your personal data and therefore we advise you to read their privacy notice and/or data protection policy.

4. HOW WE USE YOUR PERSONAL DATA

4.1. We process your personal data for various reasons, relying on a variety of different bases for lawful processing under data protection law, as set out below.

4.1.1. To comply with our legal obligations. This may include:

- eligibility to work in the UK and Ireland checks as required by immigration laws, such as passport and visa documentation;
- payroll records, social security, child maintenance, marital status, student loans and national insurance information, to comply with social security and Taxation Authorities (tax) requirements;
- information in relation to legal claims made by you or against you, in order to comply with court processes and court orders including court ordered deductions from pay;
- Accident investigations;
- information relating to the occurrence, investigation or prevention of fraud and any other criminal offences or information required in the Civil Courts;
- pension benefits to comply with pension legislation; and
- DVLA/DVSA checks in the UK and RSA checks in Ireland to validate driving licence information including the number of points on your licence if you drive our vehicles or hire cars.

4.1.2. To perform the contract of employment you have entered in to with us. This may include:

- formal identification documentation relating to you, such as a passport or driving licence, to verify your identity (including your date of birth);
- your contact details such as your name, address, telephone number(s) and personal email address which will be used to communicate with you on employment matters during your employment;
- details of emergency contacts;
- bank details which are used to send/receive funds to/from you such as payment of your salary, expenses, professional subscription fees, or to make or repay loans;
- information disclosed to a third party agency relating to your pay details for the purposes of providing tenancy references;
- information disclosed to a mortgage provider relating to your employment history and pay details for the purposes of a mortgage application; and
- information disclosed to a prospective future employer relating to your employment details for the purposes of providing a reference;
- stock options, share plans, incentive plans and save as you earn schemes relating to you in order to comply with the terms of any such scheme;
- information relating to the enrolment or renewal of your employment benefits including pension and life assurance in order to provide you with these benefits; and
- details of the terms and conditions of your employment.

4.1.3. To perform sales contracts you have entered in to with us.

We will set up cash or credit accounts for you to use to purchase goods and services from us. We will use your personal data to manage these accounts, to fulfil any orders placed by you and manage warranty claims. When setting up a credit account we may undertake a credit reference check on you.

4.1.4. To pursue our (or a third party's) legitimate interests as a business. This may include:

- training records, appraisals, 360 review reports and 1:1 meeting notes about you in order to assist/assess your career development and training needs and/or to ensure that you are properly managed and supervised;
- information relating to the performance of your employment duties, such as disciplinary records, as this is relevant to your ability to carry out your job and for us to assess and identify areas in which we may need to help you improve;
- information relating to the performance of your duties may also be used to conduct an investigation if circumstances warrant it and to take appropriate action either for conduct or capability reasons in accordance with our Grievance and Disciplinary Policies/Procedures;

- information relating to any grievance process involving you, in order that an investigation may be conducted and appropriate action taken (if any) in accordance with our Grievance and Disciplinary Policies/Procedures;
- management reports (including statistical and audit information) to ensure workplace efficiencies are maximised;
- health, safety and environmental information, including records to ensure that we are complying with relevant policies and procedures. This allows us to implement any training where applicable;
- work related contact details on our intranet and/or internal systems to facilitate efficient communication within the business;
- voicemails, emails, correspondence and other work-related communications created, stored or transmitted by you using our computer or communications equipment for the purposes of the efficient management of the business in accordance with the General Delegation UK and Ireland IT User Charter which is available at <http://staging.portalng.saint-gobain.com/web/gbr/governance-and-compliance-home> ;
- non-medical absence records and details including holiday records, appointments, jury service, maternity, paternity, adoption and parental leave in order to monitor attendance levels and to comply with our policies;
- CCTV across the whole of our estate for the protection of our property, security reasons, health and safety reasons and to ensure business efficiencies. For more detail see our CCTV Policy and Use of CCTV Guidance Note which are available at <http://staging.portalng.saint-gobain.com/web/gbr/gdpr> ;
- We process your personal data to control access to our properties for the protection of our property and for health and safety reasons. This includes the use of swipe access cards and biometric data for identification purposes only. This data may be used for calculating the amount of pay due to you;
- network and information security data in order for us to take steps to protect your information against loss, theft or unauthorised access in accordance with the General Delegation UK and Ireland IT User Charter which is available at <http://staging.portalng.saint-gobain.com/web/gbr/governance-and-compliance-home>;
- data relating to tracking devices/technologies and activities in respect of our vehicles you drive, in order to maximise efficiencies within the business.
- where we have set up either a cash or credit account for you to purchase goods or services from us we shall use you data to monitor your account activity, market to you, correspond or communicate with you concerning your account and manage any queries, complaints, or claims;
- photographs of you are retained in your employment records and may be included on security and access cards and in internal directories;
- photographs and videos of you are used in newsletters, bid documents and training and marketing materials to enable us to efficiently manage and develop our business;
- use of voice and video recordings captured by mystery shoppers for the purposes of quality assurance, identifying individual training needs and providing training to staff to improve the overall quality of the services provided by Saint-Gobain.

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

4.3. 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 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 and we will explain the legal basis which allows us to do so.

5. HOW WE USE SPECIAL CATEGORY PERSONAL DATA

5.1. We also collect, store and use your special category personal data for a range of reasons, relying on a variety of different bases for lawful processing under the GDPR.

5.2. **To enable us to perform our legal obligations in respect of employment, social security, and social protection law**, in line with General Delegation UK & Ireland Data Protection Policy. This may include:

- information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws;
- information relating to you involving allegations of unlawful discrimination, in order that an investigation may be conducted and appropriate action taken (if any) under our Grievance and Disciplinary Policies/Procedures;

- health information to assess and/or to comply with our obligations under employment, equal opportunities and health and safety legislation (for example a requirement to make reasonable adjustments to your working conditions); and
- trade union membership information to pay trade union premiums, register the status of a protected employee and to comply with employment law obligations.

5.3. **For occupational health reasons or where we are assessing your working capability**, subject to appropriate confidentiality safeguards. This may include:

- 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;
- sickness absence records, such as statement of fitness to work, reasons for absence and self-certification forms; and
- records of return to work interviews/meetings.

5.4. **Where it is needed in the public interest and/or for statistical purposes**, such as for equal opportunities monitoring. To ensure meaningful equal opportunities monitoring and reporting, we will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, and your sexual life or orientation. This information will be either anonymised or pseudonymised to the effect that you will not be identifiable.

5.5. **To establish, defend or exercise legal claims in an employment tribunal or any other court of law.**

6. INFORMATION ABOUT CRIMINAL CONVICTIONS

6.1. In certain circumstances we will hold information about criminal convictions.

6.2. We will only collect this information if it is appropriate given the nature of your role and where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations, provided that we do so in line with the General Delegation UK & Ireland Data Protection Policy. We may collect this information as part of the recruitment process, as part of the checks that we are required to undertake if you drive for us or we may be notified of such information directly by you in the course of you working for us.

6.3. We will use information about criminal offences and convictions in the following ways:

- Checking for driving convictions to ensure that you may lawfully drive Company or hire vehicles;
- Where appropriate as part of a disciplinary procedure or to recover losses of fees and salary paid where gained by way of pecuniary advantage;

7. PROFILING and AUTOMATED DECISION MAKING

7.1. We may use automated systems to profile your data. "Profiling" means any form of automated processing to evaluate certain personal aspects relating to you, in particular to analyse or predict aspects concerning performance at work, development, financial situation, health, personal preferences, interests, reliability, behaviour, location or movements.

7.2. 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.

7.3. Automated decision-making takes place when an electronic system uses information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

7.3.1. Where we have notified you of the decision and given you 21 days to request a reconsideration;

7.3.2. Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights; and

7.3.3. In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

7.4. If we make an automated decision on the basis of any special category of personal data, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

8. DATA SHARING

8.1. We may share your personal data and special category personal data internally. In particular, it may be shared with: HR employees involved in the recruitment process, employee relations and/or administration of your employment; line managers; consultants; advisers; or other appropriate persons who we shall make you aware of from time to time.

8.2. We may share your personal data and special category personal data with other companies within the Saint-Gobain Group. They may use your personal data:

8.2.1. as part of our regular reporting activities on performance;

8.2.2. in the context of a business reorganisation or group restructuring exercise;

8.2.3. for systems maintenance support and hosting of data;

8.3. In accordance with the General Delegation UK & Ireland Data Protection Policy, we may share your personal data and special category personal data with third parties, agents, subcontractors and other organisations (as listed below) where it is necessary to administer the working relationship with you or where we have a legitimate interest in doing so:

- occupational health providers;
- financial product/services providers (including auditors);
- payroll, expense management and pension providers;
- insurance providers;
- employee benefits providers;
- training providers;
- recruitment agencies;
- providers of IT services; and
- providers of legal services

8.4. When we disclose your personal data to third parties, we only disclose to them any personal data that is necessary for them to provide their service. We have contracts in place with these third parties in receipt of your personal data requiring them to keep your personal data secure and not to use it other than in accordance with our specific instructions.

8.5. In accordance with the General Delegation UK & Ireland Data Protection Policy, we only disclose your personal data to third parties who we are sure have adequate policies/procedures in place in relation to data security and they have agreed to comply with the required data security standards, policies and procedures and put adequate security measures in place.

8.6. We may also share your personal data and special category personal data with other third parties for other reasons. For example, in the context of the possible sale or restructuring of the business; to provide information to a regulator; or to otherwise comply with the law. To comply with our legal obligations we may share your data with the following:

- Taxation Authorities for tax purposes;
- Immigration Authorities for immigration purposes;
- student loan agencies to ensure that appropriate reductions are made from your salary; and
- DVLA/DVSA checks in the UK and RSA checks in Ireland to validate driving licence information and the number of points on your licence if you drive company vehicles.

8.7. We may share your personal data with third parties such as mortgage providers, property rental providers, relocation services providers or prospective future employers (as stated at 5.1.4) with your consent.

9. TRANSFERRING INFORMATION OUTSIDE OF THE EEA

- 9.1. Your personal data may be used, stored or accessed by staff operating outside the EEA working for us, other members of our group or suppliers.
- 9.2. If we provide any personal data about you to such non-EEA members of our group or suppliers, we will take appropriate measures to ensure that the recipient protects your personal data adequately. These measures may include the following, as permitted in Articles 45 and 46 of the General Data Protection Regulation:
 - In the case of US-based entities, entering into European Commission-approved standard contractual arrangements with them, or ensuring that they have signed up to the EU-US Privacy Shield (see further <https://privacyshield.gov/welcome>); or
 - In the case of entities based in other countries outside the EEA, entering into European Commission-approved standard contractual arrangements with them.
 - If you require further information about these protective measures, you can request it from your Business' Privacy Correspondent.

10. DATA STORAGE AND SECURITY

- 10.1. Your personal data and special category personal data is stored in a variety of locations, including: electronically on our secure servers/in hardcopy form in access-restricted, locked filing cabinets.
- 10.2. More information as to where specific categories of personal data are stored is set out in our Employee Data Retention Policy, which is available at <http://staging.portalng.saint-gobain.com/web/gbr/gdpr> .
- 10.3. We take appropriate technical and organisational security measures and have rules and procedures in place to guard against unauthorised access, improper use, alteration, disclosure and destruction and accidental loss of your personal data. For more information see our Information Security Policy, which is available at <http://staging.portalng.saint-gobain.com/web/gbr/gdpr>
- 10.4. In addition, we limit access to your personal data to those members of our workforce who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.
- 10.5. We have put in place procedures to deal with any suspected or actual data security breach and will notify you and the Information Commissioner's Office in the UK and the office of the Data Protection Commissioner in Ireland in the event of a suspected breach where we are legally required to do so.
- 10.6. Whenever we propose using new technologies, or where processing is construed as 'high risk', we are obliged to carry out a Data Protection Impact Assessment which allows us to make sure appropriate security measures are always in place in relation to the processing of your personal data.

11. DATA RETENTION

- 11.1. We keep your personal data and special category personal data for as long as is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements, and in line with our Employee Data Retention Policy, which is available at <http://staging.portalng.saint-gobain.com/web/gbr/gdpr>
- 11.2. The retention period varies depending on the category of personal data we hold, and the role(s) which you have held during your employment with us. At the expiry of the set retention period, or in other select circumstances, your personal data will be permanently and securely deleted.
- 11.3. In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case we may use and retain such information without further notice to you, as it falls outside of the definition of personal data under the GDPR.

12. YOUR DUTIES

- 12.1. We encourage you to ensure that the personal data that we hold about you is accurate and up to date by keeping us informed of any changes to your personal data. You can update your details by contacting HR or via the bubble portal available at www.sgbubble.com.

- 12.2. As a member of our workforce, you also have obligations under various data protection laws. Our policy on data protection is set out in the General Delegation UK & Ireland Data Protection Policy. You are required to be familiar with and comply with these rules and procedures.

13. YOUR RIGHTS

- 13.1. You may make a formal request for access to personal data and/or special category data that we hold about you at any time. This is known as a Subject Access Request. Such a request may be made verbally or in writing and we must respond within one month. We may ask you to provide additional information to enable us to process your request. Please note that under the GDPR we are permitted to extend the one month time period for responding by an additional two months where in our view your request is complex or numerous in nature. We may also charge a reasonable fee based on administrative costs where in our view your request is manifestly unfounded, excessive or a request for further copies. Alternatively, we may refuse to comply with the request in such circumstances. For further details on subject access requests and the types of request listed below, please refer to our Data Subject Rights Policy and Procedure, which is available at <http://staging.portalng.saint-gobain.com/web/gbr/gdpr>
- 13.2. Under certain circumstances, by law you also have the right to request:
- 13.2.1. to have your personal data corrected where it is inaccurate;
 - 13.2.2. to have your personal data erased where it is no longer required. Provided that we do not have any continuing lawful reason to continue processing your personal data, we will make reasonable efforts to comply with your request;
 - 13.2.3. that your personal data be transferred to another person;
 - 13.2.4. to restrict the processing of your personal data where you believe it is unlawful for us to do so, you have objected to its use and our investigation is pending, or you require us to keep it in connection with legal proceedings; and
 - 13.2.5. to object to the processing of your personal data, where we rely on **legitimate business** interests (see 4.1.3) as a lawful reason for the processing of your data. You also have the right to object where we are processing your personal data for direct marketing purposes. We have a duty to investigate the matter within a reasonable time and take action where it is deemed necessary. Except for the purposes for which we are sure we can continue to process your personal data, we will temporarily stop processing your personal data in line with your objection until we have investigated the matter. If we agree that your objection is justified in accordance with your rights, we will permanently stop using your data for those purposes. Otherwise, we will provide you with our justification as to why we need to continue using your data.
- 13.3. The way we process your personal data and the legal basis on which we rely to process it may affect the extent to which these rights apply. If you would like to exercise any of these rights, please address them in writing to your Privacy Correspondent whose details can be found at 15 below.
- 13.4. We may need to request specific information from you to help us to confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is an appropriate security measure to ensure that personal data is not disclosed to any person who has no right to receive it.
- 13.5. 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 your Privacy Correspondent whose details can be found at 15 below. 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. If you withdraw your consent, our use of your personal data before your withdrawal is still lawful.
- 13.6. You may complain to a supervisory body if you are concerned about the way we have processed your personal data. In the UK this is the Information Commissioner's Office (<https://ico.org.uk/>) and in Ireland is the office of the Data Protection Commissioner (<https://dataprotection.ie/>).

14. QUESTIONS

- 14.1. If you have any questions about any matter relating to data protection or the personal data and/or special category personal data that that we process about you, please contact your Privacy Correspondent whose details can be found at 15 below.

15. CONTACT US

- 15.1. A list of all of our Privacy Correspondents together with their contact details is set out in the Schedule to this Privacy Notice. Please direct any queries about this policy or about the way we process your personal data to the Privacy Correspondent for the Company and Business for whom you work.

SCHEDULE 1

Saint-Gobain UK & Ireland Group Companies, Trading Names and Privacy Correspondents

Company	Business	Privacy Correspondent	Contact Details
Saint-Gobain Building Distribution Limited	Bassetts Benchmark Building Supplies Blackpool Power Tools Build Aviator Calders & Grandidge Castle Wood Floors Ceramic Tile Distributors Chadwicks Frazer Gibbs & Dandy Ideal Bathrooms International Decorative Surfaces International Timber JP Corry Pasquill Swedecor	David Clark	dataprotection@sghbd.co.uk
Jewson Limited	George Boyd Graham Jewson Jewson Tool Hire Matthew Charlton Minster Neville Lumb Priority Plumbing Priority Supplies Priority Interior Building Supplies Roger W Jones	David Clark	dataprotection@sghbd.co.uk
Norman Limited		David Clark	dataprotection@sghbd.co.uk
Domestic Heating Services (Wholesale) Limited	DHS	David Clark	dataprotection@sghbd.co.uk
Saint-Gobain Building Distribution (ROI) Limited	PDM	David Clark	dataprotection@sghbd.co.uk
Scotframe Limited		David Clark	dataprotection@sghbd.co.uk

Company	Business	Privacy Correspondent	Contact Details
Scotframe Timber Engineering Limited		David Clark	dataprotection@sgbd.co.uk
Val-U-Therm Limited		David Clark	dataprotection@sgbd.co.uk
Saint-Gobain Glass (United Kingdom) Limited	Saint-Gobain Glass	Danielle Taylor	dataprotection.SGGlassUK@saint-gobain.com
	Glassolutions	Amarjit Sandhu	dataprotection.glassolutions@saint-gobain.com
	Gibbs & Dandy Glass	Amarjit Sandhu	dataprotection.glassolutions@saint-gobain.com
	Swisspacer	Amarjit Sandhu	dataprotection.glassolutions@saint-gobain.com
Saint-Gobain Vetrotech AG		Meltem Kartel	dataprotection.DelUK&I@saint-gobain.com
Saint-Gobain High Performance Materials UK Limited	Saint-Gobain Abrasives	Catherine Roe	dataprotection.SGAUK@saint-gobain.com
	Saint-Gobain Performance Plastic Tygaflor	Jonathan Holden	dataprotection.sgpplytygaflor@saint-gobain.com
	Saint-Gobain Performance Plastics Corby	David Rogers	dataprotection.sgplcorby@saint-gobain.com
	Saint-Gobain Industrial Ceramics	Nigel Hales	dataprotection.industrialceramics@saint-gobain.com
Saint-Gobain Performance Plastics Rencol Limited		Robert Lockyer	dataprotection.rencol@saint-gobain.com
Saint-Gobain Construction Products UK Limited	British Gypsum	Paul Deacon	dataprotection.britishgypsum@saint-gobain.com
	Saint-Gobain Formula	Keith Ratcliffe	dataprotection.sgformulauk@saint-gobain.com
	Saint-Gobain Ecophon	Will Jones	dataprotection@ecophon.com
	Saint-Gobain Pam UK	Richard Wall	dataprotection.sgpamuk@saint-gobain.com
	Saint-Gobain Weber	David Harrison	dataprotection@netweber.co.uk
	Ham Baker Pipelines	Richard Wall	dataprotection.sgpamuk@saint-gobain.com
	Celotex	Liz Cramp	dataprotection@celotex.co.uk
BPB Limited		Alun Oxenham	dataprotection.DelUK&I@saint-gobain.com
Artex Limited		Helen Tunnicliffe	Dataprotection.Artex@saint-gobain.com
Saint-Gobain Isover UK Limited		Mark Williams	dataprotection.sgisoveruk@saint-gobain.com
Saint-Gobain Limited	General Delegation Finance Shared Service Centre HR & Payroll Shared Service Centre SGTS	Alun Oxenham	dataprotection.DelUK&I@saint-gobain.com
Saint-Gobain Construction Products (Ireland) Limited		Paul Whelan	dataprotection.SGCPI@saint-gobain.com
Saint-Gobain Mining Limited		Paul Whelan	dataprotection.SGCPI@saint-gobain.com
Saint-Gobain Performance Plastics Ireland Limited		Margaret O'Sullivan	dataprotection.sgpli@saint-gobain.com
Saint-Gobain Life Sciences Ireland Limited		Margaret O'Sullivan	dataprotection.sgpli@saint-gobain.com