

DATA PROTECTION PRINCIPLES

1. As your employer, Europcar Group UK Limited (in the UK) and either Executive Trust Limited (company registration number 22423) or Gocar Carsharing Limited (company registration number 475845) (in the Republic of Ireland), (all referred to in this notice as both “the Company” and “We”), We will comply with all relevant data protection law. This says that the personal data we hold about you must be:
 - a. Used lawfully, fairly and in a transparent way;
 - b. Collected only for valid purposes and not used in any way that is incompatible with those purposes;
 - c. Relevant to the purposes we have told you about and limited only to those purposes;
 - d. Accurate and kept up to date;
 - e. Kept only as long as necessary for the purposes we have told you about; and
 - f. Kept securely.

THE TYPE OF INFORMATION WE HOLD ABOUT YOU

2. Personal data means any information We hold about you from which you can be identified.
3. As your employer, We will process personal data about you. Processing means doing anything with the data, such as collecting, recording, organising, storing, accessing, disclosing, destroying or using the data in any way.
4. The Company will process personal data about you which may include contact details (including next of kin details), date of birth, financial information, details of your education and previous employment history, recruitment information, equal opportunities information, references, basic Disclosure and Barring Service (DBS) checks (UK only), bank account details, national insurance number (in the UK) or personal public service number (in the Republic of Ireland), salary, employment records (including job titles, work history, working hours, training records and professional memberships), expenses information, medical information (in relation to absence due to sickness and for occupational health purposes), performance information, disciplinary and grievance information, photographs, CCTV footage, door card or security card information, vehicle telematics device information and other information obtained through electronic means and information about your use of our information and communications systems. The exact type of personal data will depend on your role within the Company.

HOW YOUR PERSONAL INFORMATION IS COLLECTED

5. The Company will collect personal information supplied directly from you during the course of your employment and will also collect personal information about you 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 or other background check agencies, for example we carry out a basic Disclosure and Barring Service (DBS) check on all new joiners to the Company (in the UK only). We will collect additional personal information in the course of job-related activities throughout the period of you working for us, which may include data collected through Company systems.

HOW WE WILL USE INFORMATION ABOUT YOU

6. The Company will process personal data where it is necessary for the performance of your contract or where processing is necessary to comply with our legal obligations. This means we are processing your personal data in order for us to enter into a contract of employment or terms of engagement, as well as for statutory purposes in our role as an employer.
7. In other cases, processing may be necessary to comply with any legal and regulatory requirements, pursue the legitimate interests of the Company or the Europcar Mobility Group and to protect your interests. If you do not provide this data, we may be unable, in certain

circumstances, to comply with our obligations and may be unable to continue to employ you. We will discuss this with you should this become relevant.

8. We will process data about you for legal, personnel, administrative, training and management purposes and to enable us to meet our legal and regulatory obligations as an employer. The following is a non-exhaustive list of examples of situations where we will process your personal data:

- Making a decision about your recruitment or appointment, for example, checking that you have the requisite skills and experience for the position for which you have applied.
- Determining the terms on which you work for us.
- Checking you are legally entitled to work in the UK or the Republic of Ireland (as applicable).
- Checking that your name does not appear on any sanctions list*.
- Paying you and deducting tax and National Insurance contributions (in the UK) or Pay Related Social Insurance contributions (in the Republic of Ireland).
- Providing your benefits.
- Liaising with your pension provider.
- Administering the contract we have entered into with you.
- Business management and planning, including accounting and auditing.
- Conducting performance reviews, managing performance and determining performance requirements.
- Making decisions about pay reviews and compensation.
- Assessing qualifications for a particular job or task, including decisions about promotions.
- Gathering evidence for possible grievance or disciplinary hearings should the need arise (which can include, but is not limited to, CCTV images and data obtained from a telematics device fitted in a company vehicle).
- Making decisions about your continued employment or engagement.
- 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.
- Payment of sickness pay and/or arranging for support for you whilst you are unwell.
- Complying with health and safety obligations.
- To prevent fraud.
- To monitor your use of our information and communication systems to ensure compliance with our IT policies.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- To conduct data analytics studies to review and better understand employee retention and attrition rates.
- Equal opportunities monitoring.
- For the publication of internal communications, including, but not limited to, the use of e-mail addresses (whether business or personal) stored in MyView for the sending of Company correspondence.
- When you drive a company vehicle (whether for your own use or for delivery to/ collection from a customer or for internal vehicle movements) which has been fitted with a vehicle telematics device.

(*a list of designated individuals against which any type of sanction, i.e. economic, trade, diplomatic, cultural or any other restriction, has been imposed, as issued and amended from time to time by: (a) the U.S. government, including OFAC's list of Specially Designated Nationals and Blocked Persons, as well as other lists maintained by the U.S. Department of State; (b) the United Nations Security Council, (c) the European Union and any Member State (including the EU's consolidated list of persons subject to EU financial sanctions); and (d) the

United Kingdom (including the consolidated list of financial sanctions targets issued by the UK's Office of Financial Sanctions Implementation).

9. Much of the information we hold will have been provided by you, but some may come from other internal sources, such as your manager, our systems, or in some cases, external sources such as referees, benefit suppliers, medical professionals, training providers and references / background check agencies.
10. You will, of course, inevitably be referred to in many Company documents and records that are produced by you and your colleagues in the course of carrying out your duties and the business of the company.

HOW WE USE PARTICULARLY SENSITIVE INFORMATION ABOUT YOU

11. "Special categories" of particularly sensitive personal data, for example, medical or health-related information, require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:
 - a. In limited circumstances, with your explicit written consent.
 - b. Where we need to carry out our legal obligations and in line with our GDPR.
 - c. Where it is needed in the public interest, such as for equal opportunities monitoring, and in line with our GDPR processing notice.
 - d. Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.
12. We will use your particularly sensitive personal information in the following ways:
 - a. 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.
 - b. 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. We will also need this data to administer and manage statutory and company sick pay, health insurance, life insurance policies.
 - c. We will use relevant information to ensure meaningful equal opportunity monitoring and reporting.
13. We do not need your consent if we use special categories of your personal information in accordance with our written policy 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 of employment with us that you agree to any request for consent from us to process sensitive personal data.
14. We only collect, store and use the minimal amount of sensitive personal data as is necessary for the purposes set out above. We also ensure that only the members of staff who have a need to access this data are granted access. Such data is sent via secured means when it is transferred both within and outside the Company.
15. Line managers should be aware that any personal data, whether written or oral, relating to their direct reports must be treated with the strictest confidence. This means that it should not be shared with anyone else within the business unless a) that person has a genuine business purpose to receive such information which cannot be achieved in any other way or b) that the direct report whose personal data is being shared has given their advance written consent to such sharing.

INFORMATION ABOUT CRIMINAL CONVICTIONS (UK ONLY)

- 16.** We envisage that we will hold information about criminal convictions. We will collect information about criminal convictions as part of the recruitment process and through background checks or we may be notified of such information directly by you in the course of you working for us.

AUTOMATED DECISION MAKING

- 17.** Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:
- a. Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights. For example, the calculation of income tax and national insurance deductions through the payroll system.
 - b. Where we have notified you of the decision and given you 21 days to request a reconsideration.
 - c. In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights, which also includes the use of any sensitive personal data for automated decision making.

DATA SHARING

- 18.** We will transfer information about you to other companies in the Europcar Mobility Group for purposes connected with your employment or the management of the company's business. We also transfer data to third parties that process data on our behalf, for example, the providers of our payroll system and our learning management system and companies which provide background checks on our behalf.
- 19.** We will only disclose information about you to third parties if we are legally obliged to do so, or a legitimate business requirement, or where we need to comply with our contractual duties to you. This will include the administration of your benefits, including your pension. It may also include supplying a reference about you on request from a future employer whilst you are still working for or have left the Company.
- 20.** In limited and necessary circumstances, your information may be transferred outside of the European Economic Area or to an international organisation to comply with our legal or contractual requirements or where there is a legitimate business requirement. In the event of transfer of your personal data outside of the European Economic Area or to an international organisation, we will use reasonable endeavours to ensure that your personal data is subject to the same level of protection as is required by data protection law in the UK (or by the EU in the Republic of Ireland).

DATA RETENTION

- 21.** We will not keep your personal data for longer than is necessary for the purpose. This means that data will be destroyed or erased from our systems when it is no longer required. When an employee leaves the Company, their personal data is normally deleted within seven (7) years of his or her departure date. The exception to this is pension information and in the event of an ongoing claim under employment law or under our employer's liability insurance.
- 22.** We will only process your personal data for the specific purpose or purposes set out here or as notified to you from time to time or for any other purposes specifically permitted by law.

YOUR RIGHTS

- 23.** 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.

24. Under the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA), you have a number of rights with regard to your personal data. Under certain circumstances, you have the right to:

- a. 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.
- b. 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.
- c. 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. 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).
- d. 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.
- e. 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.
- f. Request the transfer of your personal information to another party.

25. 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 local Human Resources Department in writing. We will then assess whether we can comply with these requests, in accordance with the relevant legislation, and will promptly inform you of our decision.

RIGHT TO WITHDRAW CONSENT

26. In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information 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 local Human Resources Department in writing. 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.

27. If you wish to know what personal data we hold about you, you may make a subject access request in writing (as set out above at paragraph 22a). All such written requests should be forwarded to your local Human Resources Department. We will provide a copy of the information free of charge, unless the request is manifestly unfounded or excessive (particularly if it is repetitive), in which case we may charge a reasonable fee based on the administrative cost of providing the information.

IDENTITY AND CONTACT DETAILS OF CONTROLLER AND DATA PROTECTION OFFICER

28. The Company is the controller and processor of data for the purposes of GDPR and any relevant local legislation.

If you have any concerns as to how your data is processed you can contact your local Human Resources Department using the details below:

UK:

Europcar Group UK Limited
Human Resources Department
1 Great Central Square
Leicester
LE1 4JS
United Kingdom

Republic of Ireland:

Executive Trust Limited/Gocar Carsharing Limited
Human Resources Department
35 Northwood Court
Northwood Business Park
Santry
Dublin 9
D09 F1P0
Republic of Ireland.

The Data Protection Officer for the Company is Aurélie Banck, Group DPO, based in Paris.

CHANGES TO THIS PROCESSING NOTICE

- 29.** This processing notice has been updated on 2 May 2023. We reserve the right to update this processing notice further at any time, and we will communicate any changes made via email, employee portal, intranet or Workplace. We may also notify you in other ways from time to time about the processing of your personal information.