

Colt's General Privacy Notice for employees

1. What does this Privacy Notice cover?

The purpose of this present 'General Privacy Notice for employees' ("**Privacy Notice**") is to **inform** Colt's employees, contractors and other staff members ("**Staff**" or "**you**") how **Colt Technology Services Group Limited** ("**Colt**" or "**Colt group**") collects and handles/processes Staff's personal data ("**Personal Data**") as detailed below.

Colt collects and uses your **Personal Data** to manage every employment relationship, to comply with Colt's legal obligations as employer, to achieve Colt's business legitimate interests and, occasionally, for other purposes based on individual consent if applicable.

Colt is committed to providing with the **highest standards of Data Protection**, thus your Personal Data will be used in line with applicable data protection laws, including, without limitation, the EU's General Data Protection (Regulation (EU) 2016/679), including as it forms part of UK law (collectively, the "**GDPR**").

Colt is also committed to comply with **local laws** on data protection. If necessary, applicable local specifications will be included in a separate document.

This Privacy Notice **describes** what Personal Data will be handled/processed by Colt, how, why, our legal basis, for how long, with whom it will be shared and the rights that may be available to you as Staff, among other details.

2. What Personal Data does Colt process, why and what for?

Colt only collects and processes your Personal Data when Colt has a legal basis for doing so and when that Personal Data is necessary for a legitimate purpose ("**Purpose**").

In respect of each Purpose, the GDPR requires us to ensure that we have a "legal basis" for that use. Most commonly, we will rely on one of the following legal bases:

- Where we need to perform a contract/agreement we are about to enter into with you or have entered into with you ("**Execution of a contract**").
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests ("**Legitimate interests**").
- Where we need to comply with a legal or regulatory obligation ("**Legal obligation**").

The table below shows at a high level the respective Purpose for which Colt may use different categories of Personal Data, and the relevant legal basis for doing so:

What Personal Data?	Legal basis	What Purpose for?
Name and contact data: name and surname, address and contact details, including email address, telephone number.	Execution of a contract	To comply with Colt's obligations related to the employment agreement (before, during and after the contractual relationship)
Background information: background screening, details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with Colt and, your criminal record if necessary, in relation to your role at Colt.	Execution of a contract Legal obligation	To comply with Colt's obligations derived from legal, regulatory, tax, labor, telco regulations, security laws and standards, social security, health and safety laws (e.g., the EU Working Time Directive and Decree Law 8/2019).
Personal and family information: date of birth, gender, your nationality, entitlement to work in the respective country, marital status, next of kin, dependents and emergency contacts.	Execution of a contract Colt's legitimate interest	To maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency).
Employment information: terms and conditions of your employment, your remuneration, including entitlement to benefits such as pensions or insurance cover, your schedule (days of work and working hours) and attendance at work, periods of leave taken by you, including holiday, sickness absence, family leave and sabbaticals, and the reasons for the leave, any disciplinary or grievance procedures in which you have been involved, your performance, including appraisals, performance reviews and ratings, performance improvement plans and related correspondence and, details during your life-cycle as Staff including reason for leaving and results of the surveys you participated in.	Execution of a Contract Colt's legitimate interest	To operate and keep a record of disciplinary and grievance processes, of Staff performance and related processes, of absence and absence management procedures, of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to obtain occupational health advice, to ensure effective general HR and business administration, to provide references on request for current or former Staff, to respond to and defend against legal claims, and to maintain and promote equality in the workplace to run recruitment and Staff promotion processes.
Workplace information: Information relating to your access to our offices and facilities, such as ID photographs or security camera footage of you.	Colt's legitimate interest	To operate, manage, and secure our IT systems, premises and facilities (including by sharing your personal data with third parties, where appropriate).

Travel information: your identification and contact details, travel preferences and requirements, government-issued identification data, booking history and itinerary details, loyalty programme numbers, emergency contact details, and any other data you provide in connection with travel (including special category data such as dietary or health-related data).	Colt's legitimate interest Legal obligation Individual's consent	To manage employment-related travel and associated services (including booking, payment, compliance with legal/regulatory requirements, handling incidents, and accommodating special requests).
Financial Information: your bank account and national insurance number.	Legal obligation	To comply with Colt's obligations derived from legal, regulatory, tax, labor, social security, health and safety laws.
Sensitive data: Information about medical or health conditions (including whether or not you have a disability), your ethnic origin, sexual orientation, health, religion or belief.	Individual's consent, legal obligation and execution of a contract	To process certain sensitive Personal Data in relation to Staff with disabilities to make reasonable adjustments, and to otherwise ensure equal opportunities

3. Where does Colt process your Personal Data and with whom do we share it?

Colt processes, shares and will transfer your Personal Data as follows:

- **Colt Group companies.** Colt processes your Personal Data within the UK, the European Economic Area (EEA), and other jurisdictions in which it has established a Colt Group entity (e.g., India (i.e., in respect of Indian Staff), Japan (i.e., in respect of Japanese Staff), and China (i.e., in respect of Chinese Staff)).

Due to global HR processes, Staff information and Personal Data are shared all over Colt's Group entities. Where Colt transfers your Personal Data to our group entities outside of the UK, it does so by means of Colt's UK Binding Corporate Rules (BCRs). Where Colt transfers your Personal Data to our group entities outside of the EEA, it does so by means of Colt's EU BCRs.

- **Third Parties:** Colt may share your Personal Data with third party services providers for the Purposes detailed above – e.g.:
 - to obtain pre-employment references from other employers, obtain employment background checks from third-party providers and obtain necessary criminal records checks from the relevant local authority;
 - to enable travel management providers to administer employment-related travel; and
 - in connection with payroll, the provision of benefits and the provision of occupational health services (for example, MyHR (provided by SAP SuccessFactors)).

In addition, Colt may share your data with third parties whose premises you are required to access as part of your professional responsibilities, including for the purposes of providing secure access to those premises.

Colt may also share your data with third parties in the context of a sale of some or all of its business, and with professional advisors such as lawyers and accountants. In those circumstances, the data will be subject to confidentiality arrangements.

Additionally, Colt may share basic contact data with customers and partners that will process your Personal Data on Colt's behalf due to the commercial relationship. Colt may also share your data with your future employers and their vendors where you ask that we provide a reference or where we are otherwise required to provide such references by law.

Some of the mentioned third parties may be outside of the EEA or UK. Colt may transfer your Personal Data outside the EEA or UK and to jurisdictions without an adequacy decision from the European Commission or the UK Information Commissioner's Office, respectively, only where adequate safeguards have been put in place (i.e., the European Commission approved Standard Contractual Clauses (SCCs) or the UK Addendum to the SCCs). Should Colt transfer your Personal Data outside of another jurisdiction (e.g., India, Japan, China), it will also only do so where complying with the appropriate local transfer mechanism.

- **Authorities.** In addition, Colt may share your Personal Data if necessary to comply with a legal or regulatory obligation requested by law enforcement agency, court, regulator, auditors, tax authority or any other government authority (e.g., to obtain necessary criminal records checks from the relevant local authority, such as the Disclosure and Barring Services in the UK).

4. How does Colt protect Personal Data?

Colt takes the protection and security of your Personal Data seriously by means of:

- **Colt internal policies and controls:** Colt has internal policies and controls in place to ensure that your Personal Data is securely processed in line with applicable data protection laws.
- **Third Parties:** Where Colt engages with third parties to process Personal Data on its behalf, it seeks to ensure that they do so in compliance with GDPR and privacy law requirements, subject to a duty of confidentiality and the implementation of appropriate technical and organizational measures to ensure the secure processing of Personal Data.

5. For how long does Colt keep Personal Data?

Colt will only retain your Personal Data for the duration of your employment in accordance with legally required retention periods, unless there is a legitimate reason for retaining it further (e.g., to meet Colt's legal obligations).

Colt complies with global maximum retention periods for Personal Data which have been set in accordance with local HR data retention obligations. Should you wish detailed information please contact Ask HR team (askhrcolt@neocasemail.com).

6. Use of Artificial Intelligence

As part of Colt's commitment to safeguarding the privacy and Personal Data of its Staff, Colt is using artificial intelligence (AI) within the organization. AI is utilized to enhance our operations, improve the efficiency and provide a better experience for our Staff, however AI systems are configured to process Personal Data minimally, focusing only on what is necessary to fulfill their intended functions.

Colt is dedicated to ensuring that these technologies are used responsibly, aligning with our core values of integrity, transparency, and respect for individual privacy rights. We adhere to strict data governance and privacy standards, ensuring that all AI systems are operated in compliance with applicable data protection laws and regulations, implementing specific privacy impact assessment analysis including security, ethics, privacy and IT controls to ensure that our use of AI aligns with responsible and ethical uses.

Staff have the right to be informed about the AI systems that process their data, the purposes for which their data is used, and the measures in place to safeguard their privacy. We are committed to providing transparency and control over Personal Data, offering Staff the ability to exercise their data protection rights in the use of their data by AI systems.

7. Use of Aggregated Data

Colt will use department-level, aggregated office attendance data gathered from internal access control systems under its legitimate interests in line with Article 6(1)(f) of the GDPR. This data will not include any individual identifiers, timestamps, or behavioral tracking. Strict security measures and reporting thresholds ensure that only authorised personnel can access the data, always protecting individual privacy. The aggregated data will be used to support Colt's strategic goals, including employee wellbeing, organisational culture, operational security, and compliance with regulations.

Specifically, the data will be processed for the following purposes: To shape local connection plans; promote face-to-face interaction; identifying attendance trends to better plan workshops and events; detecting potential deviations and opportunities for improvement; ensuring attendance data accurately reflects employees' actual work locations to reduce the risk of discrepancies and avoid tax or social security risks and fines; enhancing security measures to reduce impersonation risk; support ESG reporting and real estate planning based on attendance needs.

8. How can you exercise your Data Protection Rights?

You can **exercise your rights** of access, rectification, erasure, restriction, portability or objection (including nomination and grievance redressal for Indian Staff) regarding the processing of Personal Data, by sending an email to Ask HR team (askhrcolt@neocasemail.com).

You can also use any of the forms related to the right you wish to exercise available at <https://www.colt.net/legal/data-privacy/individual-rights/> attaching it to your request. For best practice and for security purposes, Colt may require proof of your identity to attend your request.

In addition, where we rely on your individual consent to process Personal Data, you may withdraw such consent. Although at Colt, employment decisions are not based only on automated decision making, as a data subject you may have the right not to be subject to a decision based solely on automated processing.

Additionally, under the GDPR you are able to **lodge a complaint** to the competent data protection authority in your habitual place of residence:

- **For vendors based in the EEA:** the contact information for the data protection regulator in your place of residence can be found here: https://edpb.europa.eu/about-edpb/board/members_en.
- **For vendors based in the UK:** the contact information for the UK data protection regulator can be found here: <https://ico.org.uk/make-a-complaint/>.

However, we take our obligations seriously, so if you have any questions or concerns in relation to this Privacy Notice, Colt encourages you to raise them with us first, so that we can try to resolve them. For such purposes, please send an email to Ask HR team (askhrcolt@neocasemail.com).

Indian Staff may also contact the Consent Manager for any consent preferences topics to assure that their consent preferences are accurately managed, and for grievance redressal in respect of any act or omission by the organization concerning Personal Data management. For contact details please send an email to gdpr@colt.net.

Furthermore, as a best practice complaints can also be sent by post clearly marked for the attention of the Global Data Protection Director, Colt Technology Services, Calle Telémaco 5, 28027, Madrid, Spain.

9. Colt's contact details

Colt can be contacted:

- by post at Colt Technology Services Group Limited, Colt House, 20 Great Eastern Street, London, EC2A 3EH, UK; or
- by email at gdpr@colt.net.

10. Colt Data Protection Officer and Contact details

Colt has appointed a Group Data Protection Officer, Alessandro Galtieri, who is also India Grievance Officer to whom you can contact:

- by post at Colt Technology Services Group Limited Colt House, 20 Great Eastern Street, London, EC2A 3EH, UK; or
- via email at gdpr@colt.net, where you can also contact the Data Protection team.

More information is available in [Data Protection \(sharepoint.com\)](#)

11. Updates to Colt Privacy Notice for employees

Colt may update this Privacy Notice from time to time to comply with regulatory matters and changes in legislation if applicable.

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