Employee Privacy Notice

This Privacy Notice sets out the basis on which DX process Employee personal data, whether that data is provided to us by you directly or from a third party.

DX Group Limited ("DX") is a Controller of the employee data that DX processes.

This notice applies to current and former employees, workers and contractors.

Data protection principles

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

- Used lawfully, fairly and in a transparent way
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
- Relevant to the purposes we have told you about and limited only to those purposes
- Accurate and kept up to date
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identifying components have been removed (anonymous data). There are "special categories" of more sensitive personal data which require a higher level of protection.

The kind of information we hold about you

DX collects and processes personal data relating to its employees to manage the employment relationship. DX is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations. Data protection laws sometimes refer to these as categories of personal information.

What information does DX collect?

DX collects and processes a range of information about you. This includes:

- Your name, address and contact details, including email address and telephone number, date of birth and gender
- the terms and conditions of your employment
- details of your qualifications, skills, experience and employment history, including start and end dates with previous employers and with DX
- information about your remuneration, including entitlement to benefits such as pensions or insurance cover
- details of your bank account and national insurance number
- information about your marital status, next of kin, dependents and emergency contacts
- information about your nationality and entitlement to work in the UK
- details of your schedule (days of work and working hours) and attendance at work
- details of periods of leave taken by you, including holiday, sickness absence, family leave and the reasons for the leave
- details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence

- assessments of your performance, including appraisals, performance reviews, performance improvement plans and related correspondence
- driving licence details

We may also collect, store and use the following “special categories” of more sensitive personal information including:

- information about medical or health conditions, including whether or not you have a disability for which DX needs to make reasonable adjustments
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief
- Biometric data, including video and still images of you, voice recordings, hand geometry and samples
- information related to drug and alcohol tests, including the results of the same
- Driving and other disclosed convictions

How is your personal information collected?

DX may collect this information in a variety of ways. For example, data might be collected through application forms, CVs, obtained from your passport or other identity documents such as your driving licence, from forms completed by you at the start of or during employment (such as benefit nomination forms), from correspondence with you, or through interviews, meetings or other assessments.

Some information will be generated by internal sources, such as HR and your line manager. The results of alcohol and drug testing will be generated by DX’s external suppliers and partners who carry out the tests.

DX operates CCTV cameras and recording equipment within our locations which securely capture high resolution audio and video images to recording devices.

DX operates CCTV cameras and recording equipment within our vehicles which securely capture high resolution video, audio and telemetric data to in vehicle recording devices, the recordings and CCTV camera images are also securely streamed via the mobile data network to secure cloud storage services.

In some cases, DX may collect personal data about you from third parties, such as references supplied by former employers and information from employment background check providers.

Data will be stored in a range of different places, including in your personnel file, in DX’s Payroll and HR management system, and in other IT systems (including DX’s email system).

How we use your personal email address?

DX will only share your personal email address:

- With third parties that are stated in this document
- When agreed with you
- Where required to do so by law

DX will only use your personal email address in connection with your employment with DX, for example DX use of your email address may include sending you:

- Communications regarding employment queries, disciplinary matters, employment changes
- Copies of official documents which include your Payslip, P60, Policies, Employment contract
- Secure links that enable you to download secure versions of official documents
- Notices of key company policy changes
- Details of DX company schemes that are available to you
- Details of the required company training you must complete
- Copies of company publications

Why does DX process personal data?

DX needs to process data to enter into an employment contract with you and to meet its obligations under your employment contract. For example, it needs to process your data to provide you with an employment contract, to pay you in accordance with your employment contract and to administer entitlements [benefits, pension and insurance].

In some cases, DX needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check an employee's entitlement to work in the UK, to deduct tax, to comply with health and safety laws and to enable employees to take periods of leave to which they are entitled, or where we need to protect your interests (or someone else's interests), or where it is needed in the public interest, (or for official purposes).

In accordance with DX policies, we carry out random drug and alcohol testing across all DX sites and operations. As an employee you may be required to participate in these random tests from time to time. DX will process your information as a necessary step in recording your participation in these tests and the outcomes of testing.

In other cases, DX has a legitimate interest in processing personal data before, during and after the end of the employment relationship. Processing employee data allows DX to:

- run recruitment and promotion processes
- maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency), and records of employee contractual and statutory rights
- operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace
- operate and keep a record of employee performance and related processes, to plan for career development, and for succession planning and workforce management purposes
- operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled
- obtain occupational health advice, to ensure that it complies with duties in relation to individuals with disabilities, meet its obligations under health and safety law, and ensure that employees are receiving the pay or other benefits to which they are entitled
- operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to allow effective workforce management to ensure that DX complies with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other

benefits to which they are entitled
- ensure effective general HR and business administration
- provide references on request for current or former employees
- respond to and defend against legal claims
- maintain and promote equality in the workplace
- the management of saving and other schemes which you participate

DX location CCTV audio and video recordings are used to;

- protect colleague and company interests
- detect and prevent fraud and criminal activities
- to trace lost or incorrectly sorted items
- to confirm colleague compliance with company policies and procedures
- assist in investigations including health and safety, disciplinary and grievances

DX vehicle CCTV audio, video and telemetric data is used to;

- detect and prevent fraud and criminal activities
- assist with traffic incident investigations and legal claims

Some special categories of personal data, such as information about health or medical conditions, is processed to carry out employment law obligations, (such as those in relation to employees with disabilities).

Where DX processes other special categories of personal data, such as information about ethnic origin, sexual orientation, health, religion or belief, this is done for the purposes of equal opportunities monitoring. Data that DX uses for these purposes is anonymised. Employees are entirely free to decide whether or not to provide such data and there are no consequences for failing to do so.

If you fail to provide personal information

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 workers).

Change of purpose

We will 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. We may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Who has access to data?

Your information may be shared internally, including with members of the Personnel team (including payroll), your line manager, managers in the business area in which you work and IT staff, if access to the data is necessary for performance of their roles and where required by law.

What third parties will DX share your data with?

DX may share your data with third parties in order to obtain pre-employment references from other employers and to obtain employment background checks from third-party providers. DX may also share your data with an apprenticeship or training provider, in order for you to complete an apprentice or training programme and official company auditors to comply with statutory audit regulations.

DX may also share your data with third parties in the context of a sale of some or all of its business. In those circumstances, the data will be subject to confidentiality arrangements. DX also shares your data with third

parties that process data on its behalf, in connection with payroll, the provision of benefits and the provision of occupational health services.

DX may share board level employee data with specialist third parties in order to provide board management and collaboration services.

DX may also share your data with third parties who operate employee schemes on behalf of DX for which you have participated, for example cycle to work, SAYE or other schemes DX may introduce in the future. If you participate in a scheme, you will be provided with full details of the organisation your data will be shared with, details of your data shared and for what purpose.

DX may share your data relating to alcohol and drug testing and its results internally in HR and with your line manager. Some of your personal information will be shared with our suppliers as needed to carry out the tests.

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.

DX will not transfer your data to countries outside the European Economic Area or the United Kingdom (a third country) without notifying you. In those circumstances where we do transfer your data to a third country and that third country is not subject to an EU or UK adequacy decision, DX will ensure that appropriate safeguards are in place in accordance with our obligations under data protection laws, these may include, standard data protection clauses or other appropriate methods approved by the UK government.

How does DX protect data?

DX takes the security of your data seriously. DX has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties. This includes: -

- Personal data in the Personnel management system is encrypted and hosted in an ISO27001 certified datacentre.
- An Internet facing firewall to prevent outside penetration of DXs network. Policies allow mail to be delivered into the mail server from a specific set of addresses (our external spam filter), but no other access is allowed. This firewall also maintains a list that prevents access to malicious sites on the www.
- Spam filtering. All our mail passes through a spam filter which looks for unsolicited mail, malicious software and dangerous links.
- Local firewalling. All our workstations are individually protected by firewalls. This prevents problem software proliferating through the network and unauthorised access from one machine to another e.g. only the IT department can remotely connect to a DX laptop or desktop.

- Local anti-virus to prevent any malicious software getting through the firewall or spam filters or be brought in by other means. Every machine in the Company has anti-virus software installed which is constantly updated via a server on the network.
- All I-internet traffic is filtered through an internet proxy which inspects internet traffic for threats and prevent access to malicious sites.
- Access to data on our servers is controlled based on need and access is only provided following a formal authorisation process. All company laptops' storage is encrypted.
- Access to the ERP system, HR systems, Payroll system and the document management system are only provided based on need and access is only provided following a formal authorisation process.
- Any physical copies of personal data kept in employee's personnel files are stored in lockable cabinets and secured in a restricted office.
- Data kept at the end of an employee relationship is stored in a locked archive room with restricted access.
- Information Security Management System (ISMS), DX operates an ISMS which manages the security of key business information and personal data.
- DX has a Social Media Policy, this policy is aimed to educate employees and minimise risks when using social media which can impact DX and employees.

Where DX engages third parties to process personal data on its behalf, they do so on the basis of written instructions, these parties are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data and to only process personal data in accordance with the purposes which this notice sets out.

For how long does DX keep data?

DX will hold your personal data for the duration of your employment. At the end of employment, your data will not be kept longer than necessary for the purpose for which it was processed.

For example, personal information of employees, including terms and conditions of employment, disciplinary records, reviews and annual leave records will be kept for 7 years after employment ends. DX will keep hold of employees' PAYE, Payroll records for 7 years after employment ends, given the relevance to any pay disputes and as HMRC may request to see them in this time. Further information can be found in the "Personnel Data Retention Policy" located in the corporate intranet or available from the Personnel department upon request.

Alcohol and drug testing and results data will only be held as long as is required to fulfil DX's legal obligations and for the purposes of any subsequent disciplinary proceedings.

Your rights

Your duty to inform us of changes

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. Under certain circumstances, by law you have the right to:

- access and obtain a copy of your data on request
- require DX to change incorrect or incomplete data
- require DX to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing
- object to the processing of your data where DX is relying on its legitimate interests as the legal ground for processing
- Request the transfer of your personal information to another party

If you would like to exercise any of these rights, please contact the Data Protection Officer by emailing

dpcontroller@dxlogistics.com or contact the HR department. If you believe that DX has not complied with your data protection rights, you can complain to the Information Commissioner.

What if you do not provide personal data?

You have some obligations under your employment contract to provide DX with data. In particular, you are required to report absences from work and may be required to provide information about disciplinary or other matters under the implied duty of good faith. You may also have to provide DX with data in order to exercise your statutory rights, such as in relation to statutory leave entitlements. Failing to provide the data may mean that you are unable to exercise your statutory rights.

Certain information, such as contact details, your right to work in the UK and payment details, have to be provided to enable DX to enter a contract of employment with you. If you do not provide other information, this will hinder DX's ability to administer the rights and obligations arising as a result of the employment relationship efficiently.

If you do not provide a personal email address, this may prevent you from accessing your employment and pay information easily or may prevent you from participating in company schemes and training beneficial to you.

Automated decision-making

Employment decisions are not based solely on automated decision-making.

We will regularly review this Privacy Notice to ensure it remains accurate and up to date.