

EMPLOYEE PRIVACY NOTICE

1. INTRODUCTION

Sloan Water Technology Ltd ("**SWT**", "we", "us", or "the **Company**") is committed to protecting the privacy and security of your personal data. This Privacy Notice sets out important information about how SWT collects and processes personal data about individuals prior to, during and after employment. This Privacy Notice applies to candidates, workers, contractors and current and former employees of SWT only.

This Privacy Notice describes the categories of personal data that we collect, how we use your personal data, how we secure your personal data, when we may disclose your personal data to third parties, and when we may transfer your personal data outside of the UK. This Privacy Notice also describes your rights regarding the personal data that we hold about you including how you can access, correct, and request erasure of your personal data.

We will only process your personal data in accordance with this Privacy Notice and as permissible under the UK GDPR. We take steps to ensure that the personal data we collect about you is adequate, relevant, not excessive, and processed for limited purposes. We maintain records of our processing activities in accordance with the requirements of the UK GDPR.

You should read this Privacy Notice carefully and raise any questions you may have with us.

2. SCOPE

This Privacy Notice applies to candidates, workers, contractors and current and former employees working for SWT in the UK. In connection with your employment, the relevant data controller is **SWT with registered address at 4 Coleman Street, 6th Floor, London EC2R 5AR.**

3. WHAT PERSONAL DATA DO WE COLLECT?

For the purposes of this Privacy Notice, personal data means any information relating to an identified or identifiable individual, as defined in UK GDPR Article 4(1). Personal data excludes anonymous or de-identified data that cannot be used to identify an individual. In accordance with the data minimization principles under UK GDPR, we only collect and process personal data that is adequate, relevant and limited to what is necessary for the specific purposes of managing the employment relationship. To carry out our activities and obligations as your employer, SWT may collect, process and store the following categories of personal data to decide whether to enter into a contract of employment with you and, if successful, administer the employment relationship with you:

- personal contact information (including your name, title, home address, personal telephone number(s) and personal e-mail address)
- date of birth
- gender
- marital and dependent status
- beneficiary and emergency contact information (including next of kin)
- government identification numbers such as social insurance or other national insurance number, driver's license number, or other identification card number
- photograph
- video and recordings while on-site at company locations or meetings
- employment records (including professional memberships, work history, and proof of right to work eligibility)

- bank account details and payroll information
- documents gathered during the recruitment process (including cv, resume, application form or cover letter, references, professional memberships, qualifications, background vetting information and information shared by any applicable recruitment agency)
- general employment records including details of training, disciplinary and grievance matters, benefits, holiday and other absences, along with a copy of your employment contract, performance records (including appraisals) and compensation history
- insurance enrolment information
- start date, job title and corporate grade
- location of employment
- education
- information gathered through SWT's monitoring of its IT systems
- personal data which you otherwise voluntarily provide, for example when using your company e-mail account

The majority of the personal data provided by you is required for us to administer the employment relationship and/or comply with statutory requirements relating to immigration or taxation. Failure to provide or allow us to process mandatory personal data may affect our ability to accomplish the purposes stated in this Privacy Notice and potentially affect your ongoing employment or our ability to process your application for employment successfully.

The list set out above is not exhaustive, and there may be other personal data which the Company collects, requires, stores and uses in the context of the employment relationship. We will update this Privacy Notice from time to time to reflect any notable changes in the categories of personal data which we process.

We will collect the majority of the personal data which we process directly from you. In limited circumstances, your personal data may be provided to us by third parties, such as former employers, background vetting agencies, official bodies (such as regulators or criminal record bureaus), benefits providers and/or medical professionals.

4. HOW DO WE USE YOUR PERSONAL DATA?

We only process your personal data where applicable law permits or requires it including:

- where the processing is necessary for our legitimate interest in evaluating and selecting suitable candidates for employment, having balanced this interest against your fundamental rights and freedoms; and
- performance of our employment contract with you, where the processing is necessary to comply with a legal obligation that applies to us as your employer, for our legitimate interests or the legitimate interests of third parties, to protect your vital interests, or with your consent if applicable law requires consent.

We may process your personal data for the following legitimate business purposes:

- Considering any appropriate adjustment required during the recruitment process
- Employee administration (including payroll and benefits administration)
- Day to day management of tasks and responsibilities
- Business management and planning including if a business transfer or change of ownership occurs
- Processing employee work-related claims (for example, insurance and worker's compensation claims)
- Accounting and auditing

- Conducting performance reviews and determining performance requirements including eligibility for promotion
- Assessing qualifications for a particular job or task
- Gathering evidence to address disciplinary or grievance issues or for termination
- Complying with applicable law, such as reporting to the local tax authority
- Education, training, and development requirements
- Health administration services
- Complying with health and safety obligations

We will only process your personal data for the purposes we collected it for or for compatible purposes. If we need to process your personal data for an incompatible purpose, we will provide notice to you and, if required by law, seek your consent. We may process your personal data without your knowledge or consent where required by applicable law or regulation.

We may also process your personal data for our own legitimate interests, including for the following purposes:

- To prevent fraud
- To ensure network and information security, including preventing unauthorized access to our computer and electronic communications systems and preventing malicious software distribution
- To support internal administration with our affiliated entities
- To conduct data analytics analyses in relation to equal opportunities or to review and better understand employee retention and attrition rates
- To protect the Company's confidential and proprietary information, and intellectual property
- To carry out marketing activities with clients including creating employee profiles on our website and intranet page

Again, this list is not exhaustive and we may undertake additional processing of personal data in line with the purposes set out above.

5. AUTOMATED DECISION MAKING

You will not be subject to decisions that will have a significant impact on you based solely on automated processing, including profiling. In the limited circumstances where we may make automated decisions that affect you, we will ensure there is human intervention, provide you with an explanation of the decision, and establish simple ways for you to request reconsideration or challenge these decisions.

6. WHAT SPECIAL CATEGORIES OF PERSONAL DATA DO WE PROCESS?

Certain categories of personal data are considered "special categories of personal data" under UK law and are subject to additional safeguards:

- Race or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic data
- Biometric data
- Data concerning health

- Data concerning sex life or sexual orientation
- Data relating to criminal convictions and offenses

We process special categories of personal data only where: (1) we have your explicit consent; (2) processing is necessary for carrying out obligations under employment, social security or social protection law; (3) processing is necessary to protect your vital interests; or (4) processing is necessary for the establishment, exercise or defense of legal claims, in accordance with UK GDPR. Specifically, we may collect and process the following special categories of personal data when you voluntarily provide them for the following legitimate business purposes, including for the purpose of performing or exercising obligations or rights conferred on us by law in connection with your employment, or as applicable law otherwise permits:

- Physical or mental health information or disability status in order to comply our obligations in connection with employment in particular to comply with health and safety obligations in the workplace, to make appropriate workplace accommodations, as part of sickness absence monitoring including maintaining a sickness absence record, and to administer and facilitate the provision of company and/or state sick pay and benefits such as private medical insurance
- Race or ethnic origin, religious affiliation, health information, and sexual orientation to ensure meaningful equal opportunity monitoring and reporting
- Criminal conviction and offense information for the purpose of complying with regulatory obligations, as applicable, and evaluating your fitness for a particular position.

We will always treat information special categories of personal data as confidential and we will only share such data internally where there is a specific and legitimate purpose to do so. We have implemented appropriate physical, technical, and organizational security measures designed to secure your personal data against accidental loss and unauthorized access, use, alteration, or disclosure.

In accordance with applicable law, we have established specific retention periods for different categories of personal data based on business necessity, legal requirements, and regulatory guidance. These retention periods are regularly reviewed and updated. We will retain special categories of personal data for the following specific periods, unless a longer retention period is required by law or justified by exceptional circumstances:

- Health information: one year subject to any exceptional circumstances and/or to comply with particular laws or regulations
- Criminal record information: 6 months, although the outcome of any check will remain on the employee's record
- Equal opportunities monitoring: two years. In addition, this monitoring will always take place in accordance with appropriate safeguards as required under applicable law, including:
 - the provision of information relating to ethnic origin, race, nationality, sexual orientation and disability for the purposes of monitoring will be voluntary and processed for this purpose only with your consent;
 - wherever possible, the monitoring will be conducted on the basis of using anonymized data so individual employees cannot be identified;
 - the information processed for monitoring purposes will be maintained separately from general management and HR records.

7. WHEN DO WE SHARE EMPLOYEE PERSONAL DATA?

We will only disclose your personal data to third parties where required by law or to our employees, contractors, designated agents, or third-party service providers who require such information to assist us with administering the employment relationship with you, including third-party service providers who provide services to us or on our behalf. Third-party service providers may include, but are not limited to, payroll processors, benefits administration providers, background vetting specialists, occupational health providers, HMRC and/or any other applicable government or regulatory body, accountants, lawyers and other professional advisers and data storage or hosting providers. These third-party service providers may be located outside of the UK.

Except in the case of regulators, we require all our third-party service providers, by written contract, to implement appropriate security measures to protect your personal data. We do not permit our third-party service providers who process your personal data on our behalf to use your personal data for their own purposes.

We may also disclose your personal data for the following additional purposes where permitted or required by applicable law:

- To other members of our group of companies, including those outside the UK, where necessary for the purposes set out in this Privacy Notice and subject to appropriate safeguards and approved transfer mechanisms. Details of these safeguards can be obtained by contacting our Data Protection Officer
- As part of any reporting activities to other members of our group of companies
- To comply with legal obligations or valid legal processes such as search warrants, subpoenas, or court orders. When we disclose your personal data to comply with a legal obligation or legal process, we will take reasonable steps to ensure that we only disclose the minimum personal data necessary for the specific purpose and circumstances
- To protect the rights and property of SWT, where such interests are not overridden by your fundamental rights and freedoms
- During emergency situations or where necessary to protect the safety of persons
- Where the personal data is publicly available
- If a business transfer, merger, acquisition, or change in ownership occurs, subject to appropriate confidentiality agreements and data protection impact assessments.
- For additional purposes with your consent where such consent is required by law

8. CROSS-BORDER DATA TRANSFERS

As a global employer, we process your personal data to manage and perform your employment contract. This processing involves transfers to our group companies, including those located in the United States. We will only transfer your data where necessary for specific employment purposes and in accordance with the data minimization principle under UK GDPR .

To facilitate the data transfer to the United States, which is considered not to have the same level of data protection as the UK, we have put in place written data transfer agreements with our US parent company to secure the transfer of your personal data to the United States and other jurisdictions as necessary to perform our employment contract with you. If you have any questions about the transfer of your personal data in these circumstances, please contact us.

9. HOW WILL MY PERSONAL DATA BE KEPT SECURE?

We have implemented appropriate physical, technical, and organizational security measures designed to secure your personal data against accidental loss and unauthorized access, use, alteration, or disclosure. We regularly test and evaluate these measures to ensure their effectiveness. We limit access to personal data to those employees, agents, contractors, and other third parties that have a legitimate business need for such access and have signed appropriate confidentiality agreements. We also maintain an information security incident response plan and will notify you and the Information Commissioner's Office of any personal data breaches in accordance with our legal obligations.

10. FOR HOW LONG WILL MY PERSONAL DATA BE RETAINED?

During any recruitment process, we will retain your personal information for a period of 12 months after we have communicated to you our decision about whether to appoint you to work. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. In the event that your application is unsuccessful, after this period, we will securely destroy your personal information in accordance with applicable laws and regulations.

During the course of employment, except as otherwise permitted or required by applicable law or regulation, we will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, as required to satisfy any legal, accounting, or reporting obligations, or as necessary to resolve disputes. To determine the appropriate retention period for personal data, we consider 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 we process your personal data for and whether we can achieve those purposes through other means, and applicable legal requirements.

Following the termination of an individual's employment, SWT will typically retain data in line with its Global Document Retention and Destruction Policy, as appropriate and relevant for documents relating to employees based in the UK (link attached here: [https://sloanvalve.sharepoint.com/:b:/r/sites/SloanPolicyHub/Shared Documents/Corporate Policies/Document Retention and Destruction Policy \(FINAL 10-31-22\).docx.pdf?csf=1&web=1&e=rydD4f](https://sloanvalve.sharepoint.com/:b:/r/sites/SloanPolicyHub/Shared Documents/Corporate Policies/Document Retention and Destruction Policy (FINAL 10-31-22).docx.pdf?csf=1&web=1&e=rydD4f) unless the documents fall into those categories set out below, in which case the usual retention period will be in line with those periods set out in this notice, subject to any exceptional circumstances and/or to comply with particular laws or regulations:

Type of Data	Period of Time
General personnel file documents:	12 months from termination of employment
Contractual and pay documentation	Six years from termination of employment
Records relating to tax and social security contributions:	Six years from termination of employment
Information relating to pensions or other ongoing benefits	Six years after the end of the final financial year in which the last pension benefit was paid to the relevant pensioner

In the event of a dispute arising or persisting on termination of employment, relevant records will be retained for the purposes of such dispute, subject to regular reviews of retention necessity and in accordance with our documented retention schedule.

Under some circumstances we may anonymize your personal data so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent. Once you are no longer an employee of the company, we will retain and securely destroy your personal data in accordance with our document retention principles and applicable laws and regulations.

11. WHAT ARE MY RIGHTS IN RELATION TO MY PERSONAL DATA?

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 employment. Under UK data protection law, you have specific rights regarding your personal data, including the right to: request access to your data (Subject Access Request); have inaccurate data corrected; request erasure of your data (the 'right to be forgotten'); object to processing based on legitimate interests; restrict processing; and data portability. You may also have the right to request that we transfer your personal data to another party. If you want to review, verify, correct, or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact us at DPO@sloan.com or by calling us at the following toll-free number: 001 888-756-2612. Any such communication must be in writing.

You have a separate right of access to your personal data processed by us. To protect your privacy and security, we will verify your identity using reasonable means before granting access to your personal data. We will respond to all legitimate requests within one month of receipt. We will inform you if we require an extension due to the complexity of your request. If you wish to exercise your right of access you should set out your request in writing using the details set out below.

Finally, you have the right to raise any concerns about how your personal data is being processed with the Information Commissioner's Office (ICO) by going to the ICO's website: <https://ico.org.uk/concerns/> or 0303 123 1113, or casework@ico.org.uk.

12. WHERE CAN I GET FURTHER INFORMATION?

If you would like further information about the matters set out in this Privacy Notice, please contact our Data Protection Officer at DPO@sloan.com or by calling us at the following toll-free number: 001 888-756-2612. You may also contact your line manager, though for formal data protection matters we recommend contacting our DPO directly.

13. CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this Privacy Notice at any time, and we will provide you with a new Privacy Notice when we make any updates. If we would like to use your previously collected personal data for different purposes than those we notified you about at the time of collection, we will provide you with notice and, where required by law, seek your consent, before using your personal data for a new or unrelated purpose. We will only process your personal data without your knowledge or consent where we have a legal basis to do so under UK data protection law, such as compliance with a legal obligation, performance of the employment contract, or other legitimate grounds under the UK GDPR .

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