

## Precision Castparts Corp.

### Our Privacy Notice

#### Job Applicant, Employee, Worker and Contractor in the European Union or United Kingdom ("Relevant Persons") Privacy Notice <sup>1</sup>

##### Who is the Data Controller?

Precision Castparts Corp. is a company registered in Oregon United States of America with its registered office at 4650 S Macadam Ave, Suite 400, Portland, Oregon 97239. This privacy notice applies to Precision Castparts Corp. and its subsidiary companies ("**PCC**") which and to the extent process and store information from which Relevant Persons that are citizens of or located in the United Kingdom or European Union are identified or identifiable ("**Personal Data**").

For company data protection registration details please contact your potential employer, employing, or engaging company ("**Relevant PCC Company**"), or email [communications@precastcorp.com](mailto:communications@precastcorp.com).

##### Why do we use your personal information?

To verify your identity, process and contact you to progress your application for employment/ engagement assess your suitability for a role you have applied for or for which we have approached you, administer your contract of employment or engagement, manage our business, assist with the development and improvement of our recruiting process, comply with our legal and regulatory obligations and for the purposes of record keeping, security, the prevention and detection of crime and management of legal risk.

For more detail please see Appendix 1.

##### Our legal bases for using your personal information

Where necessary for the performance of your contract of employment or engagement or to take steps at your request prior to entering into such a contract, and where necessary to comply with our legal obligations (for example as regards tax, health and safety and equal opportunities legislation) and in accordance with our legitimate interests and where you give your consent. For special category Personal Data (for example relating to your health or criminal record (see below)) our legal basis for processing will typically include necessity for the purposes of carrying out employment, social security and social law obligations and your explicit consent.

For more information about our processing of special category Personal Data and lawful bases of processing, please see Appendix 3.

##### What information about you do we use?

We may collect the following information about you:

- information used to identify you, your employment history and qualifications, your experience and performance, your bank details and other information you (or your third party representative(s)) provide to us during the search and/or application process and your employment/engagement, or otherwise share publicly;
- CCTV images we obtain in and around the workplace (all areas covered by CCTV use are clearly signed);
- Information you otherwise provide or produce in the course of your role search, application and/or employment/engagement including any documents or communications made or websites accessed using our IT systems which may be monitored from time to time;
- information obtained about you from profiling or other testing (if applicable);
- information about you obtained from third party organisations, including your previous employers or referees, the Disclosure and Barring Service and credit reference agencies (CRAs), and Denied Parties Screening (which screens individuals against international sanctions lists). The identities of the CRAs, their role also as fraud prevention agencies, the data they hold, the ways in which they use and share personal information, data retention periods and your data protection rights with the CRAs are explained in more detail at <https://www.equifax.co.uk/crain.html>; for the United Kingdom, or equivalent body in other jurisdictions;

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<sup>1</sup> In compliance with the General Data Protection Regulation (EU) 2016/769 and other local laws: V3 issued August 2021

- information about your emergency contact details
- information obtained from other public data sources which might include data from the electoral roll in the United Kingdom, or equivalent in other jurisdictions, and public records including court judgments.

For more detail see Appendix 2.

**What if you do not provide information that we request or agree to us undertaking checks?**

Where we request specific information from you in order to take steps towards entering into a contract of employment or engagement with you, failure to provide that information could mean that we are unable to progress your candidacy. In certain circumstances, this could mean that we are unable to enter into a working relationship with you. If we seek your consent to undertake certain checks and you refuse this, we will still proceed to consider your application but the absence of the information requested may adversely affect your chances of being offered a contract.

In addition, once an employment or other contractual arrangement is established with you then failure to provide requested information could mean that we are unable to administer aspects of that relationship. This could include, for example, processing payments due to you, or the administration of work-related benefits.

**When can we use or record sensitive information about you?**

We may collect "special categories" of particularly sensitive Personal Data about you. This type of information requires higher levels of protection. It could include information about your ethnicity, religion, physical or mental health, trade union membership or other sensitive information from you. We may collect this information where you disclose it to us voluntarily or where we collect it as part of your employment/engagement (including for example drug and/or alcohol testing results). We may process this information where it is necessary for the purposes of complying with the law in relation to your employment/engagement (or law which is applicable as a result of your employment, such as our obligations under Health and Safety and Equality legislation). We may also process this information where you have provided your consent by volunteering this information to us. You have a right to withdraw your consent at any time but this will not affect the lawfulness of any processing which has already occurred.

For more detail see Appendix 3

**Who may we share your information with?**

We may share your information with:

- our partners, agents, professional advisers or our third party service providers;
- law enforcement agencies or regulatory bodies where we are required to do so;
- other members within the PCC group of companies;
- any purchaser or proposed purchaser of all or part of the PCC group or their assets, together with their professional advisors;
- you or your third party representatives (in line with your rights); or
- with other third parties where we believe, in good faith, that it is necessary to protect our rights, property, safety or reputation or the rights, property, safety or reputation of any of our clients or partners.

For more detail see Appendix 4

**Can we change the purposes we process your information for?**

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 only do so in compliance with laws.

Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

**Where is your information stored? Where can it be transferred?**

The information we collect and hold about you will be stored by PCC, or where applicable its third party data processors, and therefore may be retained in its jurisdiction of origin or transferred into or outside of the European Economic Area (the **EEA**), or the United Kingdom, for example where it is accessed by PCC group company staff in the US, or where it is provided using our online systems such as job search and applications, training, profiling, conference registrations and other similar platforms.

**How long will your information be kept on file?**

To ensure that your Personal Data is adequately protected, we ensure all recipients operate in jurisdictions that have the benefit of an adequacy decision of the European Commission, or are otherwise subject to appropriate measures.

Where you apply for employment/engagement but are unsuccessful we will normally keep your data for up to 1 year or such longer period as consented by you. We may ask if you would like your details retained in our talent pool. If you say yes, we may contact you should any vacancies we consider suitable arise. Where you are employed or engaged we will keep your information during and after the end of your employment/engagement to the extent it is necessary for the protection of our legitimate interests, and longer where otherwise required by law. Our Retention Policy is available on request.

**Your rights**

- Right of access** You have a right to access the personal information we hold about you (subject to certain limitations).
- Right of rectification** You can ask us to correct or update your information to ensure it is accurate and complete.
- Right to erasure and right to restrict processing** You can ask us to stop processing and to delete your data in certain circumstances (for example where it is processed with your consent, or it is no longer necessary for us to process it).
- Right to data portability** You have a right to ask us to provide you with information in a form that suits you, and/or to provide personal information that you have given us to a third party (subject to certain conditions).
- Right to object** You have a right to object to our processing of your information (in certain circumstances).
- Rights: profiling and automated decisions** You have a right not to be subject to automated decisions which have a legal effect and to be protected by safeguards in respect of any profiling.

You can exercise the above rights by contacting us. Further information about your rights is also available from data privacy and protection governing bodies in all European jurisdictions. In the United Kingdom the governing body is the ICO ([www.ico.org.uk](http://www.ico.org.uk)). In the Republic of Ireland the governing body is the Data Protection Commission ([www.dataprotection.ie](http://www.dataprotection.ie))

**Contact and complaints**

If you have any questions about this Privacy Notice, want to exercise your rights or make a complaint, please contact the Data Protection Coordinator or Human Resources Manager at your Relevant (or proposed Relevant) PCC Company in the first instance, or email [communications@precastcorp.com](mailto:communications@precastcorp.com). You can also make a complaint to the ICO, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF, telephone 0303 123 1113. [www.ico.org.uk](http://www.ico.org.uk). In the United Kingdom, or to the Data Protection Commission in the Republic of Ireland at [www.dataprotection.ie](http://www.dataprotection.ie) or to the equivalent data privacy and protection governing bodies in other jurisdictions.

**Profiling and Assessments**

We use profiling techniques to assist with recruitment and retention for certain management and leadership roles, and certain appraisal systems. We may ask you to participate in assessment days, complete tests or personality profile questionnaires or similar (in person or online), attend interviews or other recruitment focused exercises. Information will be generated by you and by us, for example you may complete a test, we may take interview notes, or our profiling system may produce personality and suitability scores and reports. This information will be held by us and where applicable, our third-party service providers.

**Updates**

Updates to this privacy notice will be made from time to time and may be notified to you by email, post, website, or notice board display where appropriate.

## **Appendix 1 – situations and purposes for which we may process your information**

We may process your Personal Data for the following purposes:

- Making a decision about your recruitment or appointment.
- Determining the terms on which you work for us or provide services to us and other pre-employment (including transfer, secondment or promotion) checks.
- Checking you are legally entitled to work in the relevant jurisdiction.
- Paying you and, if you are an employee, deducting tax and National Insurance contributions (or equivalent in the relevant jurisdiction).
- Providing and administering contractual and statutory employment benefits to you.
- Liaising with your pension provider.
- Administering the contract we have entered into with you.
- Business management and planning, including customer service, accounting and auditing.
- Conducting performance reviews, managing performance and determining performance requirements.
- Making decisions about salary reviews and compensation.
- Assessing qualifications for a particular job or task, including decisions about promotions.
- Gathering evidence for possible grievance, disciplinary or capability hearings including appeal hearings.
- Making decisions about your continued employment or engagement.
- Making arrangements for the termination of our working relationship.
- 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.
- Managing sickness absence.
- 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 including (without limit) review of company email system content and usage, and company hardware and systems storage.
- 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.
- To contact your next of kin/named contacts in the event of an emergency.

## Appendix 2 – what information we may collect about you

- We may collect, store, and use the following categories of Personal Data about you:
- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Gender.
- Marital status and dependants.
- Next of kin and emergency contact information (please ensure you advise such next of kin or emergency contact details that you have provided us with their personal information).
- National Insurance number or equivalent.
- Bank account details, payroll records and tax/social security status information.
- Salary, annual leave, pension and benefits information.
- Start date.
- Location of employment or workplace.
- Copy of driving licence and/or passport or other identity documents.
- Details about your personal or work vehicle and related insurance.
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter, or as part of the application and selection process including notes taken during interviews and any opinions expressed about you).
- Information made publicly available, for example on social media platforms.
- Employment records (including job titles, work history, working hours, training records and professional memberships).
- Information generated pursuant to the undertaking of your employment.
- Compensation and compensation history.
- Performance information including assessment and profiling records and reports (if applicable).
- Disciplinary and grievance information.
- CCTV footage and other information obtained through electronic means such as swipecard /time recording records, visitor attendance records, automatic number plate recognition and similar systems
- Information about your use of our information and communications systems, including your internet usage on PCC IT assets.
- Photographs, videos, and other recordings.
- Sickness, health and medical records.

## **Appendix 3 – special categories of data: how and why we may use sensitive information about you**

### **Lawful basis for processing and our obligations as an employer**

“Special categories” of particularly sensitive Personal Data require higher levels of protection. We need to have further justification for collecting, storing and using this type of Personal Data. We may process special categories of Personal Data in the following circumstances:

- In limited circumstances, with your explicit written consent.
- Where we need to carry out our legal obligations and in line with our data protection policies.
- Where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme.
- Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else’s interests) and you are not capable of giving your consent, or where you have already made the information public.

We will use your particularly sensitive Personal Data in the following ways:

- 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.
- 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.
- Where you suffer an accident or fall ill at work, we may use your information for the purposes of compliance with employment and health and safety law.
- We will use information about your race or national or ethnic origin or religion, to ensure meaningful equal opportunity monitoring and reporting.
- We will use trade union membership information to pay trade union premiums, register the status of a protected employee and to comply with employment law obligations.
- We will use drug and alcohol test results (where applicable) to assess suitability to work, ensure compliance with Relevant PCC Company policies and applicable employment and health and safety law, ensure your health and safety and the health and safety of others in the workplace.

### **Do we need your consent?**

We do not need your consent if we use special categories of your Personal Data in accordance with our procedures to carry out our legal obligations or exercise specific rights in the field of employment law and other relevant laws. Otherwise we will approach you for your written consent to allow us to process certain particularly sensitive data.

If we do so, we will provide you with 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 with us that you agree to any request for consent from us.

### **Background checks and information about criminal convictions**

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our legal obligations. We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we have your written consent. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of you working for us.

## Appendix 4 – third parties

PCC uses partners, agents, professional advisers and third party service providers in the day to day conduct of its business. This includes, without limitation, the use of third party data processors to conduct the following:

- elements of recruitment services (including candidate profiling-where used);
- elements of pre-employment (including transfer, secondment and promotion) checks and tests;
- elements of employee appraisal, time and attendance and general human resource management;
- elements of drug & alcohol testing (where applied);
- elements of occupational health or other medical assessments and reviews;
- elements of employee compensation and benefit provision and administration;
- elements of IT and general business and enterprise management systems;
- elements of customer service and continuous improvement systems.

When utilised by a Relevant PCC Company, a third party may process your personal data. Records of such third parties are maintained by the Relevant PCC Company and details can be provided on request.

Where PCC refers to other organisations and/or provides links to other websites, this Privacy Notice does not cover how that organisation processes Personal Data. You are encouraged to read the privacy notices provided by such other organisations and/or made available on the other websites you visit.