



Third Party Privacy Notice

INTRODUCTION

This Privacy Notice ("**Privacy Notice**") explains what personal data Encyclis Limited ("**Encyclis**", "**we**", "**us**", "**our**") collects about visitors to Encyclis sites, contractors working at or with Encyclis, and other individuals with whom we may have a business relationship, what we will use it for and with whom we share that information. This Privacy Notice also sets out your rights and who you can contact for more information. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

Encyclis is a data controller of your personal data, which means we decide how to process your personal data and have certain responsibilities in relation to your personal data. Personal data means any information that can be directly or indirectly related to you.

In this Privacy Notice the term "**Data Protection Legislation**" means all applicable legislation relating to privacy or data protection in force from time to time, including the EU General Data Protection Regulation ("**GDPR**") and the GDPR as it forms part of the domestic law of the United Kingdom.

WHO DOES THIS PRIVACY NOTICE APPLY TO?

This Privacy Notice applies to:

- **Encyclis site visitors:** individuals who visit Encyclis sites, including Encyclis offices and Encyclis plants.
- **Encyclis contractors:** individuals working at or with Encyclis as contractors, or individuals who are employees or otherwise represent contractors working at or with Encyclis.
- **Any individuals with whom we may have a business relationship:** which may include suppliers of Encyclis, or employees or other representatives of Encyclis suppliers with whom we have a business relationship, and employees or other representatives of Encyclis customers with whom we have a business relationship.

References to "**you**" and "**your**" are references to Encyclis' site visitors, contractors or any other individual with whom we may have a business relationship.

CHANGES TO THIS PRIVACY NOTICE

Any changes we make to this Privacy Notice in the future will be posted on this page on the Encyclis website. We strongly encourage you to check this Privacy Notice from time to time. However, any material changes to this Privacy Notice will be notified through an appropriate method.

HOW WE COLLECT YOUR PERSONAL DATA

We collect and process personal data directly from you or which we gather about you during the course of your relationship with Encyclis.

Where the personal data we process is collected from you, its provision to us is generally required in order to maintain our relationship with you or to allow you to visit our sites. In some cases it may mean we are unable to continue our relationship with you, or unable to allow you

on-site, as Encyclis will not have the personal data we believe necessary for the effective and efficient administration and management of our relationship with you or to manage site visits.

You may also provide us with personal data of third parties. By providing us with such personal data you confirm that you have informed these third parties of what data you intend to provide to Encyclis and the processing carried out by Encyclis, as detailed in this Privacy Notice.

PERSONAL DATA WE COLLECT

The personal data we process may include:

Encyclis Site Visitors	
Visitor Data	Your name.
Visitor Security and Monitoring Data	Images of you that are captured on CCTV systems.
Visitor Health and Safety Data	Data relating to incidents that have been reported, which may include data about your health depending upon the incident.
Visitor Images	Images of you that are captured for promotional purposes for use on Encyclis' website.
Encyclis Contractors	
Contractor Data	Your name, next of kin and emergency contact, membership numbers for card schemes and ID numbers.
Contractor Health Data	Medical history including medications taken and existing conditions or injuries.
Contractor Incident Data	Data relating to incidents that have been reported, which may include data about your health depending upon the incident.
Contractor Security and Monitoring Data	Images of you that are captured on CCTV systems.
Contractor Images	Images of you that are captured for promotional purposes for use on Encyclis' website.
Other individuals with whom we have a business relationship	
Business Contact Data	Your name and work contact details; any other details that you may choose to provide to us.
Business Financial Data	Bank account information.

Under Data Protection Legislation, special categories of personal data include data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and genetic data, biometric data, data concerning health or data concerning a person's sex life or sexual orientation.

Some of the personal data that Encyclis holds about you are deemed special categories of personal data under Data Protection Legislation (for example, any health data included in

Visitor Incident Data or Contractor Incident Data, and Contractor Health Data is special category personal data). Encyclis will usually only process these special categories of personal data to manage any incidents that occur on site or, for contractors only, to conduct inductions.

HOW WE USE YOUR PERSONAL DATA

Data Protection Legislation requires that we process your personal data for purposes that we tell you about and only where we have a lawful basis to do so. The below table sets out our purposes of processing, the lawful basis of processing we rely on, and the personal data processed for that purpose.

Purpose of processing	Lawful basis of processing	Personal Data
Encyclis Site Visitors		
For visitors to sign in to the office and to facilitate site visits	<ul style="list-style-type: none"> Our legitimate interests (for record-keeping purposes and to ensure smooth running of site visits) 	Visitor Data
Security and monitoring access to offices and plants	<ul style="list-style-type: none"> Our legitimate interests (to ensure the security of our buildings and sites) 	Visitor Security and Monitoring Data
To report incidents	<ul style="list-style-type: none"> Our legitimate interests (to ensure health and safety, for record-keeping purposes) Compliance with a legal obligation <p>With respect to any special category personal data:</p> <ul style="list-style-type: none"> Vital interests Necessary for the purposes of carrying out our obligations as in connection with employment For the establishment, exercise or defence of legal claims 	Visitor Data, Visitor Incident Data
For promotional purposes for use on the Encyclis website	<ul style="list-style-type: none"> Our legitimate interests (to promote Encyclis on the Encyclis website) 	Visitor Images
Encyclis Contractors		
Management of contractors (carrying out inductions)	<ul style="list-style-type: none"> Our legitimate interests (to ensure the smooth operation of each plant and to ensure health and safety) Compliance with a legal 	Contractor Data and Contractor Health Data

Purpose of processing	Lawful basis of processing	Personal Data
	obligation. With respect to any special category personal data: <ul style="list-style-type: none"> Necessary for the purposes of carrying out our obligations as in connection with employment 	
Security and monitoring access to offices and plants	<ul style="list-style-type: none"> Our legitimate interests (to ensure the security of our buildings and sites) 	Contractor Security and Monitoring Data
To report incidents	<ul style="list-style-type: none"> Our legitimate interests (to ensure health and safety, for record-keeping purposes) Compliance with a legal obligation With respect to any special category personal data: <ul style="list-style-type: none"> Vital interests Necessary for the purposes of carrying out our obligations as in connection with employment For the establishment, exercise or defence of legal claims 	Contractor Data, Contractor Incident Data
For promotional purposes for use on the Encyclis website	<ul style="list-style-type: none"> Our legitimate interests (to promote Encyclis on the Encyclis website) 	Contractor Images
Other individuals with whom we have a business relationship		
To maintain relationship with you or your employer	<ul style="list-style-type: none"> Our legitimate interests (to be able to administer our relationship with individuals with whom we have a business relationship and for the operation of our business) 	Business Contact Data
To issue or pay invoices	<ul style="list-style-type: none"> [Necessary for performance of a contract with you] 	Business Financial Data

SHARING YOUR PERSONAL DATA

Encyclis may disclose your personal data to the following categories of third party recipients where we consider it necessary for the purposes set out in this Privacy Notice:

- Encyclis affiliates.
- Third parties who provide various services to us in connection with our relationship with you or any other related purposes (such as IT service providers, or third parties who provide access and security services in respect of our sites).
- Professional advisors, such as accountants, lawyers or auditors.
- Regulators or other authorities or third parties to comply with the law or assist in a criminal or regulatory investigation, or to protect us (for example, to help prevent fraud or protect or enforce our rights).
- Other parties as part of a corporate transaction, for example if it is proposed that we are to merge with or be acquired by another business in the future.

HOW WE PROTECT YOUR PERSONAL DATA

Encyclis takes all reasonable steps to keep your personal data secure and confidential. In particular, we maintain appropriate physical, organisational and technical measures so as to prevent any loss, misuse, unauthorised access, disclosure, or modification of your personal data.

HOW LONG WE KEEP YOUR PERSONAL DATA

We will only keep your personal data for as long as it is required for the purposes for which it was collected, or as required to comply with applicable law or to defend or enforce our legal rights.

OVERSEAS TRANSFERS OF YOUR PERSONAL DATA

We may transfer your personal data to a recipient based in a country outside of the UK and/or European Economic Area ("**EEA**"). Where we do so, we will ensure that such transfer is in accordance with our obligations under Data Protection Legislation.

For example, this may involve transferring your personal data to a jurisdiction deemed to provide an adequate level of protection of your personal data by the UK and/or European Commission. Other times, the recipient may be in a jurisdiction which has less stringent laws relating to personal data. In these circumstances, Encyclis will put in place appropriate safeguards to ensure that your personal data remains adequately protected, which may include entering into appropriate standard contractual clauses with the recipient of the data such as the International Data Transfer Agreement or the EU Standard Contractual Clauses alongside, where applicable, the UK Addendum to the EU Standard Contractual Clauses.

If you would like more details about the safeguards we rely on, please contact us using the contact details set out below.

YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA

You have various rights in relation to the personal data we hold about you. These include:

- to request access to or a copy of any personal data which we hold about you;
- to rectification of your personal data, if you consider that it is inaccurate or incomplete;
- to erasure of your personal data, if you consider that we do not have the right to hold it;
- to restrict processing of your personal data;
- to data portability (moving some of your personal data elsewhere); and
- to object to your personal data being processed in a particular situation, which you may exercise if we rely on the fact that the processing is necessary for the purpose of legitimate interests pursued by Encyclis in order to carry out that processing.

Where we rely on consent to process your personal data, you also have the right at any time to withdraw any consent you give to our processing of your personal data.

Any request for access to or a copy of your personal data must be in writing and we will respond within any time limits provided for in Data Protection Legislation.

However, please note that some of these rights may not always apply, as there are sometimes requirements and exemptions which may mean we need to keep processing the personal data or not disclose it, or other times when the rights may not apply at all. We will always tell you if we think we do not have to comply.

RIGHT TO COMPLAIN

You also have the right to complain to the regulator about Encyclis' information rights procedures. In the UK, the relevant regulator is the ICO and their contact details are available here: <https://ico.org.uk/make-a-complaint/>. In Ireland, the relevant regulator is the Data Protection Commissioner and their contact details are available here: <https://www.dataprotection.ie/en/individuals/exercising-your-rights/raising-concern-commission>.

CONTACTING US

Questions, comments and requests regarding this Privacy Notice are welcomed and should be addressed to the General Counsel. You may also use these contact details if you wish to make a complaint to us relating to your privacy.

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