

# Privacy Notice

This Notice of Data Collection, Processing and Transfer (the “Notice”) for JG Environmental Ltd (the “Company”), located at Andrews House, 61 Wallingford Road, Uxbridge, UB8 2RW in the United Kingdom, describes:

- What Personal Data the Company **collects** about you;
- How the Company **uses** your Personal Data;
- To whom the Company **discloses** your Personal Data;
- Any international **transfers** of your Personal Data;
- How the Company **safeguards** your Personal Data;
- Whether the Company engages in **automated decision making**; and
- Your **rights** regarding your Personal Data.

For purposes of this Notice,

“**Personal Data**” means any information concerning an identified or identifiable individual; and

“**Processing**” means any operation with respect to Personal Data, such as collection, retrieval, access, use, disclosure, storage or disposal of Personal Data.

## **Collection, Use and Disclosure of Your Personal Data**

**Collection.** The Company collects Personal Data from you during the application process. We may also collect information about you from third parties, such as recruiting companies. Additionally, during your employment, the Company collects Personal Data from you and from managers, for example, through performance evaluations. The Personal Data collected includes, but is not limited to, the following:

First and last names	CV/work history information	Information regarding compensation and benefits, including bonus or commission, if any	Grievance and disciplinary actions, investigations, and/or proceedings
Business, personal and emergency contact information	Hire date	Education, certifications and training	Salary details and tax status
Date of birth	Job title	Performance evaluations	Banking information
Gender	Job categories	Termination date	Photo
Marital status	Department of employment	Reason for termination	
Driver's license number, Social Security (or equivalent government identifiers)	Place of executing the employment		
Citizenship status	Job status		
Employee ID Number	Supervisor(s)/Line Manager		
	Weekly hours		
	Overtime		
	Holiday entitlement		

Information provided by you to the Company relating to other people (e.g. your partner, dependents, etc.) will be processed by the Company in accordance with this Notice. You are responsible for the accuracy of such information and for ensuring that those people are aware of the nature of the information you have provided and the way in which it will be processed by the Company.

The Company may also collect Sensitive Personal Data about you, such as health information, as required by law or as necessary to manage matters related to occupational health, disability accommodation, and sick leave. The Company generally will not transfer sensitive personal data outside of the European Union ("EU") except where an employee's supervisor is located outside the EU and has a legitimate, business need to know.

**Use.** The Company uses Personal Data, as necessary, for all purposes related to the creation, administration and termination of your employment relationship with the Company. These purposes include, but are not limited to, the following:

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| For recruitment and onboarding;                           | To manage holiday and other leaves of absence;                       |
| To set up a personnel file;                               | To arrange business travel;  |
| To manage personnel and employment matters;               | To reimburse business expenses;                                      |
| To administer payroll, other forms of compensation;       | To administer access to physical facilities;                         |
| To offer and administer employment benefits and services; | To meet legal and regulatory requirements;                           |
| To provide training;                                      | To manage any legal claims, investigations or disputes involving the |
| To evaluate job performance;                              |  |

Company or affiliated companies;

The Company also may use your Personal Data to facilitate administrative functions, including, but not limited to, the management and operation of information technology and communications systems, risk management and insurance functions, budgeting, financial management and reporting, strategic planning, and the maintenance of licenses, permits and authorisations applicable to the Company's business operations.

These uses are necessary for the Company to fulfil its obligations under its employment agreement with you, such as to administer payroll; are required to fulfil the Company's legal obligations, such as to accommodate a disability; or are necessary for the Company to pursue its legitimate interests, such as to evaluate job performance or to arrange business travel. Please understand that if you do not provide your Personal Data, the Company may not be able to provide you with certain benefits of employment. For example, the Company requires your social security number (or equivalent) to process payroll and will not be able to manage your compensation unless you provide your citizenship status and right to work in the UK.

**Disclosures.** Due to business requirements or contractual or statutory obligations, the Company may need to disclose your Personal Data to Authorised Third Parties (defined below) for the purposes described above. The Company generally will not disclose your Personal Data to any other third parties unless the disclosure is required by law (for example, to tax authorities), is necessary to protect your health or safety or the health or safety of third parties, and in other limited circumstances where disclosure is legally permitted or required.

**"Authorised Third Parties"** include third-party service providers under written contract with the Company or with the Parent Corporation (defined below) on the Company's behalf, such as auditors, administrative service providers, background check providers, employment agencies, travel agencies, and any other entity providing services to the Company.

## 2. International Transfers of Personal Data

Because the Company is part of a global multinational corporation, your Personal Data may be accessed by The Norvestor and its affiliated entities ("Parent Corporation"). The Parent Corporation may use your Personal Data for the purposes of global business reporting, planning and strategy development for the organization and in most cases your data will be anonymized. Only a limited number of employees of the Parent Corporation with a need to know to perform their job responsibilities will be permitted access to your Personal Data. Very occasionally, a member of the Norvestor group of companies located outside the EU (other than the Parent Corporation), may access, or receive your Personal Data — for example, if you work directly for that group member, if your

supervisor works for that group member, or you travel to that group member's location for business purposes. These third countries may provide different data protection standards from those in your country.

To ensure an adequate level of protection for transferred data, the Company has entered into Standard Contractual Clauses, approved by the European Commission, with the Parent Corporation and other members of the Norvestor family of companies that will have potential access to your data on a need to know basis and are located in Norway. A copy of these standard contractual clauses is available by submitting a request to [hr@jgpestcontrol.co.uk](mailto:hr@jgpestcontrol.co.uk)

### **3. Security Measures for, and Retention of, Personal Data:**

The Company has implemented reasonable and appropriate administrative, physical, and technical safeguards for your Personal Data. For example, your Personal Data will be stored on a secure server when in electronic form and in physically secure areas when in paper form. Technical and physical controls restrict access to your Personal Data to employees of the Company with a need to know. The Company will retain your Personal Data throughout the employment relationship and as long thereafter as is permitted by applicable law. No Automated Decision Making:

The Company does not make any decisions concerning your employment only by automated means.

### **4. Your Rights With Respect to Your Personal Data:**

You have the right to access your Personal Data and to request that the Company update, correct or delete (the "right to be forgotten") your Personal Data as provided by applicable law. You also have the right to restrict, and to object to, the Company's processing of your Personal Data and to data portability as provided by applicable law. Subject to certain limitations, the right to data portability allows you to obtain from the Company, or to ask the Company to send to a third party, a copy of your Personal Data in electronic form that you provided to the Company in connection with the performance of your employment agreement or with your consent. Your right to access your Personal Data includes your right to receive a copy of all, or a portion, of your Personal Data in the Company's possession as long as the Company providing your Personal Data would not adversely affect the rights and freedoms of others.

**Right To Object:** You have the right to object to the processing of your Personal Data based solely on the Company's or the Parent Corporation's legitimate interests. If you do object in these circumstances, the processing of your Personal Data will be stopped unless there is an overriding, compelling reason to continue the processing or the processing is necessary to establish, pursue or defend legal claims.

You can exercise these rights by submitting an email to [hr@jgpestcontrol.co.uk](mailto:hr@jgpestcontrol.co.uk). The Company will respond to such requests in accordance with applicable data protection law. If you believe that your Personal Data has been processed in violation of applicable data protection law, you have the right to lodge a complaint with the data protection authority where you live, where you work, or where you believe the violation occurred.

If the Company requests your consent to process your Personal Data and you do consent, you may use the contact information above to withdraw your consent. Any withdrawal shall not affect the lawfulness of processing based on consent before its withdrawal, and the Company will continue to retain the information that you provided us before you withdrew your consent for as long as allowed or required by applicable law.

