



## PRA Employee Information Notice given under Article 13 and 14 of the UK GDPR

This Employee Information Notice applies to the personal data of job applicants (successful and unsuccessful), and both current and previous employees.

In accordance with Article 13 and 14 of the retained EU law version of the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC applicable in the UK pursuant to the European Union (Withdrawal) Act 2018 (hereinafter the “UK GDPR”), PRA Group (UK) Limited **informs you that:**

1. **The Data Controller** of your personal data is *PRA Group (UK) Limited, located at Level 11 Riverside House, 2A Southwark Bridge Road, London, SE1 9HA (hereinafter “we” “our” and “us”).*
2. **Contact point** for matters concerning data protection:
  - a. Post: Human Resource Department, PRA Group (UK) Limited, PO Box 26249, Kilmarnock, KA3 1HA,
  - b. Email: [hr@pragroup.co.uk](mailto:hr@pragroup.co.uk)
3. **Purpose** of processing personal data and **legal basis:**
  - a. Note that your personal data will be processed by us for **the purpose** of the execution of the employment contract and for recruitment purposes
    - i. We will process your personal data when it is necessary for the performance of the employment relationship due to employment law requirements or applicable legal obligations. Typical activities are: recruitment, management of employment; recording of working time; payroll administration and payment of wages, salaries, pensions and other benefits with deductions;
    - ii. We will process your personal data to ensure compliance with our policies, legislation and/or supervisory authorities’ guidelines in relation to health and safety and other employment matters; analysis for employment management purposes and statutory returns. In some cases we will seek information from third parties, such as references from former employers and whilst undertaking checks such as criminal records, credit and background screening checks including UK Home Office legal right to work verification or publicly available sanction lists – if such information is required by law or compliance with our policies.
    - iii. The administration of funded pensions and other benefits or administration of pension schemes and or benefits may

include the following activities: processing of contributions; maintenance of accounts; payment of benefits; processing of persons leaving the scheme; analysis for management purposes; and statutory returns.

- iv. Operate and keep record of employee assessment and training; negotiation or communication with employees; talent and succession planning/career development; grievance and disciplinary investigation; monitoring for the purpose of performance management.
  - v. The administration of our policies on diversity and inclusion. Typical activities are: analysis of workplace demographics, maintenance of records relating to age, gender, ethnic background and disability for the purpose of trends analysis.
  - vi. Complying with applicable laws and regulation. Examples include: data processing activities with respect to maternity or parental leave legislation, sickness absence, working time and health and safety legislation, taxation rules, worker consultation requirements, other employment laws and regulation to which we are subject to in the conduct of our business.
  - vii. To comply with lawful requests by public authorities (including without limitation to meet national security or law enforcement requirements), discovery requests, or where otherwise required or permitted by applicable laws, court orders, government regulations, or regulatory authorities (including without limitation data protection, tax and employment), whether within or outside your country.
  - viii. if, from time to time, we require to process your personal data for purposes other than stated in this notice, we will update this notice accordingly, and let you know.
  - ix. Presentation to clients industry regulators and auditors for the purposes of demonstrating that our employees are “fit and proper” to operate our businesses. Typical activities are: maintenance of continual personal development records; maintenance of industry and academic qualifications; maintenance of employee profiles; reference and credit records.
- b. **Our legal basis** for processing your personal data is:

- i. Pursuant to article 6(1)(a) of the UK GDPR, we will process your personal data in case of your voluntary consent. Failure to provide the consent will not impact our ability to properly conduct the employer-employee relationship between you and us, where the legal basis is the employment contract and applicable law.
- ii. Pursuant to article 6(1)(b) of the UK GDPR, we will process your personal data when it is necessary for the performance of the employment relationship. Failure to provide personal data in whole or in part, could prevent us from concluding the employment contract and make it impossible for us to fulfil some or all of our obligations resulting from the employment relationship and imposed by legal obligations related to i.e. payroll, social security contribution, tax and insurance.
- iii. Pursuant to article 6(1)(c) of the UK GDPR, we will process your personal data when it is necessary for the purposes of complying with legal obligations to which we are subject to. You are obliged to provide this information where it is required by law. Failure to provide this information may result in us failing to adhere to your statutory payment rights and it may affect your accessibility to social benefits and insurance.
- iv. Pursuant to article 6(1)(f) of the UK GDPR, we will process your personal data to the extent that processing is necessary for the purposes of the legitimate interests pursued by the data controller, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subjects.

#### 4. Categories of personal data

We will process the following categories of personal data:

- a. information **relating to your identity** (e.g. first name, maiden name, last name, National Insurance number, tax records, bank account details, or similar identifier, title, date of birth),
- b. information in order for **us to be able to communicate with you** (e.g. residential address, e-mail address and telephone numbers),
- c. information about your **personal circumstances** (e.g. marital status, dependants, heirs),
- d. information about your **employment** (e.g. your wages, onboarding forms, notes, employee file, salaries, pensions, benefits, performance appraisals, sickness records, disciplinary details, education history, training history, legal right to work

documents, employment history, payroll details, compensation details, background screening checks, contract details and length of service details) and any other information necessary for the performance of the employment relationship, execution of the employment contract and employment management purposes,

e. information you **voluntarily provide to us** (e.g. personal data included in CVs, references, application forms and cover letters) and any other information that is necessary for the employment interview notes and information such as assessment notes) and any other information that is necessary for the employment relationship, execution of the employment contract, employment management and recruitment purposes (e.g. interview notes and assessment notes),

f. information you provide to us **during the recruitment process** even if you are unsuccessful at any stage of the recruitment process (e.g. personal data included in application forms, CVs, references, cover letters, interview notes and assessment notes) and any other information you provide to us and that is necessary for the recruitment process,

which in each case, are provided by you or a third party authorised by you as well as other information relevant to your circumstances which impacts the recruitment process or the execution of the employment contract. In some circumstances this information is provided by a third party such as former employees, the Financial Conduct Authority, Criminal Records Bureau, Credit Reference Agencies and the UK Home Office.

#### 5. Special categories of personal data:

a. **Our legal basis** for processing special categories of personal data is:

- i. Article 9(2)(b) of the UK GDPR in case the personal data we process includes special categories of personal data (“**Special Categories**”) as defined under applicable law. Special Categories will only be processed where necessary and permitted by applicable law.
- ii. Article 9(2)(a) of the UK GDPR in case of your explicit consent.
- iii. Article 9(2)(c) of the UK GDPR in case it is necessary to protect employee’s vital interests.

b. **We may process the following information relating to Special Categories of personal data** only if there is a valid legal basis for processing:

Health related information including sick leave, mental health information, information about disability, religion and ethnic origin.

c. The abovementioned data we collect from employees.

#### 6. Data recipients

a. For the abovementioned purpose(s) we can make your personal data available to the following recipients: (i) to any of our related affiliates within the PRA Group of companies; (ii) to our employment management platform (e.g. Workday) and payroll service providers; (iii) to any agencies or other third parties that provide us with services,

including third party companies used to send communications to you (iv) tax authorities (v) fraud prevention agencies and law enforcement agencies including where you give us false or inaccurate information or where we suspect or identify fraud; (vi) where we have your consent or as required or permitted by law, including to comply with a witness summon or similar legal process or government request, or when we believe in good faith that disclosure is legally required or we have a legitimate interest in making a disclosure, such as where necessary to protect our rights and property.

- b. Your personal data may be **transferred (stored or otherwise processed) to a recipient in a third country<sup>1</sup> for employment management, maintenance of necessary records or related legitimate purpose**. It shall mostly occur due to use of our employment management platform (Workday) or collaboration with our affiliated entities outside the UK including PRA Inc. located in the United States. We may only transfer your personal data outside the UK if: (i) the UK Government has confirmed that the country to which we transfer the personal data ensure an adequate level of protection for your rights and freedoms; or (ii) appropriate safeguards are put in place such as binding corporate rules or standard contractual clauses approved for use in the UK; or (iii) compliance by US companies with their obligations under the EU-U.S. Data Privacy Framework and valid certification.

If your personal data is transferred outside the UK, at your request we will electronically provide you with a copy of the concluded contractual provisions and information on the scope of the personal data that has been transferred. Where necessary and upon explicit request, a paper copy of this information may be sent to you.

## 7. Data Storage

Your personal data is stored for only so long as it is required for purposes for which it was collected. This will usually be the period for your employment/contract, plus the length of any applicable statutory limitation period and or reasonable period following you leaving us. Some data, such as pension information, may need to be kept for longer. We may keep some specific types of data, e.g. tax records, for different periods of time, as required by applicable law. We will not keep your data for longer than necessary for the purpose for which it was obtained, except where required by law or due to the other circumstances such as litigation or criminal or governmental investigation.

Please see our Record Retention Policy for specific timeframes on our intranet site: see Policy Hub (Europe) – HR Records Retention Policy.

## 8. Your Rights

We also would like to inform you that, subject to further legal obligations, you have the following **rights**:

- ➔ Access to your personal data - Article 15 of the UK GDPR;
- ➔ Rectify your personal data - Article 16 of the UK GDPR;
- ➔ Erasure (right to be forgotten) - Article 17 of the UK GDPR
- ➔ Restriction of processing - Article 18 of the UK GDPR
- ➔ Right to data portability - Article 20 of the UK GDPR
- ➔ Right to object to processing - Article 21 of the UK GDPR

**Right to make a complaint** to a competent supervisory authority:

Please see our Data Subject Request Procedure for specific timeframes on our intranet site; see Policy Hub (Europe) – UK Data Subject Request Procedure.

If you believe that the processing of your personal data is unlawful, you have the right **to make a complaint** to the competent supervisory authority. The name and address of the competent supervisory authority is the following:

Information Commissioner's Office (ICO)  
Wycliffe House Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

## 9. Right to withdraw consent:

Where processing of your personal data is based on consent given to us for one or more specific purposes, you may **withdraw your consent** at any time provided that this does not affect the lawfulness of the processing based on consent before its withdrawal. If you wish to withdraw your consent, please contact the Human Resource department.

## 10. Data Protection Officer:

Contact details of our Data Protection Officer are as follows:

**Email:** [privacy@pragroup.co.uk](mailto:privacy@pragroup.co.uk)

**Post:** PO Box 26249, Kilmarnock, KA3 1HA

---

<sup>1</sup> A third country is a country located outside the United Kingdom ("UK"), including the United States of America, which may not have data protection laws equivalent to those in the UK. In such case, (and provided we are not restricted from transferring your personal data in this way), we will take all necessary steps to ensure the safety and

security of your personal data in accordance with applicable data protection laws. At present the European Union and the UK have similar data protection laws for individuals, and there are several other countries that the UK views as having adequate protection.