

Data Protection Privacy Notice

Team, Consultants, Agents, Contractors, Employees

This notice aims to provide clarity on the personal data (information) we hold about you, how we collect it, and the ways in which we use and may share this information during your application with Axcelera Ltd and after its conclusion. This information is being shared with you in accordance with data protection legislation. Please take the time to review this notice, also known as a 'privacy notice,' along with any similar notices we may provide periodically when handling your personal information.

Who Manages the Information:

Axcelera Ltd (the Company) is a 'data controller' responsible for gathering and utilising specific information about you. In this notice, references to 'we' or 'us' indicate Axcelera.

Data Protection Principles:

We adhere to data protection principles, as outlined in our Data Protection Policy, when collecting and utilising personal information.

Information We Collect and Hold:

Please refer to the table provided in the Schedule at the end of this Notice. It contains a summarised outline of the information we collect and maintain, along with the purposes, methods, and usage of such data, as well as potential recipients. In certain cases, we may need to share specific categories of personal information with other parties, including external contractors, professional advisers, and potential purchasers. We make every effort to anonymise the information whenever possible, and all recipients are bound by confidentiality obligations. It's important to note that any sharing of personal information is done in compliance with applicable laws. We strive to ensure that our information collection and processing practices are always proportionate, and we will keep you informed of any changes in our data collection or processing purposes.

Information Storage:

Your information may be stored at our offices, third-party agencies, service providers, representatives, and agents.

Data Retention:

We maintain your information only for the duration necessary, both during and after your services with us. Our commitment is to hold your personal information for no longer than required for its processing purposes. For more detailed information regarding our approach to data retention, kindly refer to our Data Retention Policy, which can provide you with additional clarity on this matter.

Your Rights:

If you wish to correct or request access to information held about you, or if you have any inquiries concerning this notice in compliance with applicable law, kindly reach out to our Data Protection Team (DPT) via email at data@axcelera.co.uk. Additionally, you retain the right, under specific circumstances, to request the erasure of some of the information we hold and process (the 'right to be forgotten'). For further details about the right to be forgotten, feel free to inquire with our DPT, and they will provide you with the necessary information.

Security Measures:

We have implemented security measures to prevent accidental loss, unauthorised access, or misuse of personal information. Access to your information is restricted to those with a genuine business need, and confidentiality obligations are in place.

Data Security Breach:

In the event of a suspected data security breach, we have procedures in place to address the issue. We will notify you and relevant regulators when legally required.

How to Complain:

If you have concerns about our use of your information, please reach out to our Data Protection Team. If unresolved, you can contact the Information Commissioner for further guidance on your rights and how to file a formal complaint.

Schedules:

Schedule :

| What is collected | How the Information is collected | Reasons we collect the information | How the information is used and maybe shared |
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| Your name, contact details (i.e., contact address, contact phone numbers, email address), | From you | To enter into/perform the contract Legitimate interest: To maintain records and good practice. | To enter into/perform the contract. |
| Emergency contacts (i.e. name, relationship and home and mobile phone numbers) | From you | Legitimate interest: To maintain records and good practice. | To contact said people in case of emergency |
| Credit Check | From you and Veriphy | We process your information for various purposes, including fulfilling our contractual obligations to provide services to you and ensuring compliance with legal requirements. Additionally, we may process your data for reasons related to substantial public interest, such as preventing or detecting unlawful acts, suspicion of terrorist financing or money laundering in the regulated sector, and safeguarding the public against dishonesty. | Information shared with regulatory authorities as required |
| Information on grievances raised by or involving you | From you, and from other employees or consultants we may engage in relation to the grievance procedure | We process your information for multiple reasons, including fulfilling our contractual obligations to provide services to you and ensuring compliance with our legal responsibilities. Moreover, we have a legitimate interest in maintaining accurate records and meeting our legal, regulatory, corporate governance obligations, and adhering to good practices. | We collect and handle information for staff and consultant administration purposes, in alignment with our policies and to address any grievance matters that may arise. This information is shared with relevant managers, HR personnel, and any engaged consultants to ensure effective handling of these matters. |

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| <p>Information on conduct issues involving you</p> | <p>From you, and from other employees or consultants we may engage in relation to the conduct procedure</p> | <p>To comply with our legal obligations Legitimate interests: To maintain records, complying with legal, regulatory, and corporate governance requirements, adhering to good practices, and ensuring the implementation of safe working practices.</p> | <p>For staff and consultant administration purposes, including assessments, policy adherence, performance and conduct monitoring, and handling disciplinary and grievance matters. This information is shared with relevant managers, HR personnel, and any engaged consultants to effectively manage these aspects of our operations.</p> |
| <p>Details of your client reviews</p> | <p>From you, and from other employees or consultants we may engage in relation to the client review process</p> | <p>To comply with our legal obligations Legitimate interests: To maintain records and adhere to legal, regulatory, and corporate governance requirements, as well as best practices, ensuring a secure and compliant working environment</p> | <p>For the administration and assessment of consultants, in alignment with our policies, to oversee performance and conduct, and to address disciplinary and grievance issues. Information is disclosed to relevant managers and consultants with whom we may engage</p> |
| <p>Information about your use of our IT, communication and other systems</p> | <p>Automated surveillance of our websites and various technical systems, including computer networks and connections, communication systems, remote access systems, email and instant messaging systems, intranet facilities, and mobile phone records.</p> | <p>Legitimate interests: To supervise and oversee staff and consultant access to our systems and facilities. To safeguard our networks and the personal data of contractors and clients from unauthorised access or data breaches. To enforce compliance with our business policies, including those related to security and internet usage. For operational purposes, such as record-keeping, transaction logging, training, and quality control. To uphold the confidentiality of commercially sensitive information.</p> | <p>To protect and carry out our legitimate interests (see adjacent column) Information shared with relevant managers, and with consultants we may engage</p> |



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| | | <p>To verify adherence to post-termination restrictions or restrictive covenants after the conclusion of your contract.</p> <p>For security vetting and the investigation of complaints and allegations of criminal offenses to prevent unauthorised access and modifications to our systems.</p> <p>As part of investigations conducted by regulatory bodies or in connection with legal proceedings or requests.</p> | |
| <p>Details of your use of business related social media</p> | <p>From relevant websites and applications</p> | <p>Legitimate interests: Overseeing and managing staff and consultant access to our systems and facilities.</p> <p>Safeguarding our networks and the personal data of contractors and clients from unauthorised access or data leaks.</p> <p>Ensuring adherence to our business policies, particularly those related to security and internet usage, for operational purposes such as record-keeping, transaction logging, training, and quality control.</p> <p>Maintaining the confidentiality of commercially sensitive information.</p> <p>Verifying compliance with post-termination restrictions or restrictive covenants after the conclusion of your contract for services.</p> <p>Conducting security vetting and investigating complaints and allegations of criminal offenses.</p> | <p>To protect and carry out our legitimate interests (see adjacent column)</p> <p>Information shared with relevant managers, and with consultants we may engage</p> |



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| | | Participating in investigations led by regulatory bodies or in connection with legal proceedings or requests. | |
| Your use of public social media (only in very limited circumstances, to check specific risks for specific functions within our organisation; you will be notified separately if this is to occur) | From relevant websites and applications | <p>Legitimate interests:</p> <p>Supervising and managing access to our systems and facilities for staff and consultants.</p> <p>Safeguarding our networks, as well as the personal data of contractors and clients, from unauthorised access or data leakage.</p> <p>Ensuring compliance with our business policies, including those related to security and internet usage.</p> <p>Addressing operational needs such as record maintenance, transaction logging, training, and quality control.</p> <p>Upholding the confidentiality of commercially sensitive information.</p> <p>Verifying compliance with post-termination restrictions or restrictive covenants after the conclusion of your contract for services.</p> <p>Conducting security vetting and investigating complaints and allegations of criminal offenses.</p> <p>Participating in investigations initiated by regulatory bodies or in connection with legal proceedings or requests.</p> | To protect and carry out our legitimate interests (see adjacent column) Information shared with relevant managers, and with consultants we may engage |
| Details in references about you that we give to others | From your personal records, and our other Principals | <p>To fulfil the service agreement. To adhere to our legal responsibilities.</p> <p>Legitimate interests:</p> <p>To uphold documentation and</p> | <p>To provide you with the relevant reference</p> <p>To comply with legal/regulatory obligations</p> <p>Information shared with relevant</p> |



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| | | adhere to legal, regulatory, and corporate governance requirements, as well as best practices. | managers, and the recipient(s) of the reference |
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You are required under the terms of your contract of service ('Axcelera Team Contract'), or in order to enter into your Axcelera Team Contract, to provide the categories of information marked above to us, to enable us to verify your right to work, your suitability for the position and to pay you. If you do not provide this information, we may not be able to offer you a contract or to make payments to you.

Further details on how we handle sensitive personal information are set out in our Data Protection Policy available upon request from the Data Protection Team via email: data@yourrighthand.co.uk. Further information on the monitoring we undertake and how we do this is available in upon request from the Data Protection Team via email: data@axcelera.co.uk.