

STS Group Employee Privacy Policy

This Policy applies to employees in the STS Group as listed below:

All companies within the STS Group:

- ▶ Specialist Technical Engineering Services Unlimited Company
- ▶ STS Group Switzerland AG
- ▶ STS Elektromechanische Anlagenbau GmbH
- ▶ STS Specialist Technical Services UK Ltd
- ▶ Specialist Technical Services Sweden AB
- ▶ STS Buhindi W.L.L
- ▶ Specialist Technical Engineering Services B.V
- ▶ STS D&V NV
- ▶ STS Denmark ApS
- ▶ STS Specialist Technical Services France SAS

Under the General Data Protection Regulation (“**GDPR**”) we are required to provide our employees (the “**Employee**” or “**you**”) with information about how we process their personal data.

[References to “**we**”, “**us**” the “**Company**” shall apply to the STS Group company that is your employer.

1 Personal Data

“**Personal Data**” means any information relating to an identified or identifiable natural person (**‘data subject’**); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

This Employee Privacy Policy takes precedence over any provisions in the Employee’s contract of employment relating to the processing of the Employee’s Personal Data.

We will process Personal Data to enable us to run the business and manage our relationship with each Employee effectively, lawfully and appropriately:

- during the recruitment process;
- whilst the Employee is employed by us; and
- after the Employee has left employment.

STS has published a separate Data Protection Statement on the STS Group website that addresses non-employee Personal Data processing. This includes Business Contacts including clients, suppliers, business prospects, Website Users and prospective employees.

1.1 Categories of Personal Data

We will always seek to minimise the Personal Data that we use as part of our organisation. The employment relationship requires many different categories of Personal Data to be processed by us. We have provided further detail about the categories of Personal Data that we process, and the types of Personal Data included in those categories in the table in Personal Data Categories

1.2 Sources of Personal Data

Personal Data is normally obtained directly from the Employee. In certain circumstances, it will, however, be necessary to obtain Personal Data from other parties, e.g. your colleagues, manager, insurers and pension providers, references from previous employers, the Revenue Commissioners etc.

The company collects this information in a variety of ways. For example, as part of a recruitment process, we will collect information about candidates through such mediums as email, post, social media platforms or in person. Data is collected through:

- ▶ application forms;
- ▶ CVs;
- ▶ correspondence with you;
- ▶ through interviews, meetings, or other assessments; and
- ▶ generally, through the course of your work.

1.3 How we use Personal Data

The Personal Data that We process will be used for management and administrative purposes. We keep it and use it to enable Us to deliver our services and manage our employment relationship with Employees effectively, lawfully and appropriately and protect employees' rights and interests. This includes using Personal Data to enable Us to manage the employment contract, comply with legal obligations, pursue our legitimate interests, address HR performance management, address disciplinary situations that might arise and, to protect our legal position in the event of legal proceedings.

You have some obligations under your employment contract to provide the company with data. In particular, you are required to report absences from work and may be required to provide information about disciplinary or other matters under the implied duty of good faith or to disclose medical information which would affect your fitness to work. You may also have to provide the company with data in order to exercise your statutory rights, such as in relation to statutory

leave entitlements. Failing to provide the data may mean that you are unable to exercise your statutory rights.

If You do not provide Personal Data, we may be unable, in some circumstances, to comply with our obligations and We will inform You of the implications of that decision where possible.

We have included further details on the uses of Personal Data in the Data Record section

- ▶ the Personal Data we are processing in relation to each processing activity;
- ▶ the purposes for which we use the Personal Data; and
- ▶ the legal basis We rely on for processing the Personal Data.

Where there is a need to process Personal Data for a purpose other than those set out in this Data Protection Policy We will inform You of this.

Data is stored in a range of different places, including:

- ▶ in your personnel file;
- ▶ in the company's Time Management System
- ▶ in submissions for tenders for projects (where required)
- ▶ in the company's payroll system
- ▶ in the company's Facial Recognition Readers database
- ▶ on the company's file server in locations only accessible by authorised personnel;
- ▶ and in other relevant IT systems (including the company's email system).

1.4 Disclosure of Personal Data

We will need to share your Personal Data outside of the organisation in certain circumstances and we are required to inform You about situations where external transfers may arise. We will always ensure that any transfer of Personal Data to a third party, outside the organisation, is undertaken in compliance with the law and ensures that appropriate technical and organisational measures are undertaken as part of any transfer.

In certain circumstances, We may disclose Personal Data to certain third parties where We are legally obliged to do so or where our employment contract requires or permits Us to do so or where required for the purposes set out in this Data Protection Policy. For example, We pass on certain Personal Data to external pension and health insurance providers. We may also share Personal Data where necessary between the STS Group companies listed above or to our parent company or another company in the case of a merger or acquisition.

Further information on transfers of Personal Data to external third parties is set out in Data Record of this Data Protection Policy.

1.5 Retention of Personal Data

Any Personal Data processed about Employees is retained only for as long as it is required and otherwise in accordance with applicable law.

The summarised retention periods for your personal data are as follows:

Employee Data	Statutory Retention Period
Payslips and general wages information	Up to 10 years
Working hours, name and address of employee, PPS numbers and statements of duties	Up to 10 years
Training records	Up to 10 years
Emails	Up to 10 years
Records relating to parental leave	Up to 10 years
Tax records	Up to 10 years
Records relating to workplace accidents	Up to 10 years
Employment permit records	Up to 10 years or duration of employment
Personal Information required for specific projects	Up to 10 years (Required as part of project records retention)

1.6 Your rights

Employees have various rights relating to Personal Data and how it is used, although the Employee's ability to exercise these rights may be subject to certain conditions:

- ▶ the right to receive a copy of and/or access the Personal Data that We hold about the Employee, together with other information about our processing of that Personal Data;
- ▶ the right to request that any inaccurate Personal Data that is held about the Employee is corrected, or if We have incomplete Personal Data, the Employee may request that We update the Personal Data such that it is complete;
- ▶ the right, in certain circumstances, to request that We erase your Personal Data;
- ▶ the right, in certain circumstances, to request that We no longer process your Personal Data for particular purposes, or object to our use of your Personal Data or the way in which We process it;
- ▶ the right, in certain circumstances, to transfer your Personal Data to another organisation;
- ▶ the right to object to automated decision making and/or profiling; and

- ▶ the right to complain to the Data Protection Commission.

Please note that We cannot delete your Personal Data where:

- ▶ We are required to have it by law;
- ▶ it is used for freedom of expression;
- ▶ it is used for public health purposes;
- ▶ it is used for historical research or statistical purposes where deleting the Personal Data would make it difficult or impossible to achieve the objectives of the processing; and/or
- ▶ it is necessary for legal claims.

We cannot give You access to a copy of your Personal Data if this would adversely affect the rights and freedoms of other(s).

1.7 Security Measures

We will take all steps reasonably necessary to ensure that all Personal Data is treated securely in accordance with this Data Protection Policy and the relevant law. We monitor for and do everything we can to prevent security breaches of the Personal Data that we process.

In particular, we have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the Personal Data that We manage and collect.

To protect the Data Protection and security of Personal Data, we will also take reasonable steps to verify your identity before granting You access to your Personal Data as appropriate.

Once We have received your Personal Data, we will use strict procedures and security features to try to prevent unauthorised access.

If You think that there has been any loss or unauthorised access to your Personal Data or that of any individual, please let Us know immediately.

1.8 Transfers of Personal Data

We may transfer Personal Data outside of the European Economic Area (EEA). However We will always ensure that this is done in compliance with the relevant laws.

We will only use and share Personal Data outside of the EEA if necessary. We will ensure that any transfer of Personal Data outside of the EEA is undertaken using legally compliant transfer mechanisms and in accordance with the GDPR.

1.9 How to contact us

Please contact us if you have any questions about this Employee Privacy Policy or Personal Data that We process about you.

Controller:	STS Group Companies
Address:	Block 10A, Cleaboy Business Park, Old Kilmeaden Road, Waterford
Contact:	Email: compliance@stsgroup.ie Phone: +353 (0)51 508009
Data Protection Officer (DPO)	Tricia Higgins

1.10 Supervisory Authorities

If you have any concerns about Personal Data, please contact us compliance@stsgroup.ie to see if we can resolve the issue.

The Data Protection Commission in Ireland may be contacted at info@dataprotection.ie if You have any concerns or questions about the processing of Your Personal Data.

Online Form: <https://forms.dataprotection.ie/contact>

Address: 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland

Tel: +353 (0)1 7650100 – 1800 437 737

The contact details for the regulator in the United Kingdom, the Information Commissioners Office (ICO) are:

Online Form: <https://ico.org.uk/global/contact-us/>

Live Chat: ico.org.uk/livechat

Helpline: 0303 123 1113

You may also contact the data protection authority in your country. A list of contacts for each country is available here: <https://digital-strategy.ec.europa.eu/en/library/list-personal-data-protection-competent-authorities>

1.11 Amendments to this Policy

We may change this Data Protection Policy from time to time.

We will inform Employees of any material changes by sending a communication. We will always provide Employees with such additional notice well in advance of the changes taking effect where we consider the changes to be material.

1.12 Personal Data Categories

Personal Data Category	Description of Personal Data
Access Control Data	May include physical access e.g. building, area, car park, using swipe cards / fobs / other devices; System access using electronic devices
Apprenticeship Data	Details of apprenticeship including Contact, Identification, Education, Assessments, Results
Biometric Data	Fingerprint Scan, Facial Image
Communications Data	We will record details of certain communications. For example, we may process details of phone calls, email correspondence and hardcopy correspondence, notes/transcriptions of meeting and communications with You or about You
Contact Data	May include, name, email, home address, social media contact points, phone number, mobile number
CCTV Data	Images of staff in office locations where CCTV is in operation
Employee Role Data	This includes salary, working hours, job description, bonus, commission, probation, length of service, contract of employment, terms and conditions of employment
Exit Data	Contact Data, Exit interviews (name, team) – notes. Resignation letters, reference letters, Communications Data
Expenses Data	This is Personal Data relevant to the management and payment of expenses to the Employee and includes certain Finance & Tax Data and details of the expenses claimed by the Employee
Finance & Tax Data	This may include Contact Data, payroll, payment related information or bank account details and financial data and PPSN, payslip, salary details benefits information and other tax details including the tax bands of the employee
Health Data	Health reports, Contact & Identification Data, health issues, reason for referral, specific advice requested certs, return to work forms, maternity/ paternity forms, sick notes/certs, health and safety records, occupational health checks, disability for which the company needs to make reasonable adjustments.

Personal Data Category	Description of Personal Data
Identification Data	This includes name, date of birth, photograph, employee identification number, driver's licence, passport information, employee badge, identification card
Insurance Data	This includes the Personal Data required to manage the insurance policies made available to the Employee including pension, travel, health insurance (incl. dependents, marital status, policy details, name, D.O.B), Contact Data
Internet and Product Use Data	This includes Personal Data collected relating to internet usage, systems, and applications used by the Employee. It includes system credentials, log data and the information and content accessed or included in these systems that constitute the Personal Data of the Employee
Leave Data	This includes, annual leave, maternity, paternity, adoptive leave, sick leave, emergency leave, leave of absence, force majeure
Next of Kin Data	We will collect Personal Data relating to the Next of Kin provided by You, including their name and Contact Data
Performance & Work Data	This includes, performance/appraisals/reviews, disciplinary, grievance, promotions, bonus, Performance Improvement Plans, warnings issued and related correspondence (e.g. witness statements), bullying and harassments investigations.
Policy Compliance Data	This includes the Personal Data required to manage the policies of the organisation including, Contact Data, Performance Data, Employee Role Data, Communications Data, details of issue including, grievance, bullying/harassment, etc, investigation meetings, notes, witness statements
Recruitment , Onboarding & HR Record Related Data	This includes recruitment related Personal Data such as Identification Data, Contact Data, CV data, and job application data that we collect as part of the recruitment process, and which is retained on your employee file. When processing CV data, we may process certain Personal Data including the following: date of birth, employment history (including start and end dates, with previous employers and with the company), skills/experience, languages, educational history, qualifications, membership of professional associations, certifications, contact details of employer references/character references, licenses held, interests and hobbies, languages, locations, nationality, passport, eligibility to work in certain jurisdictions, salary expectations, marital status. As part of processing Recruitment Data, we process interview/screening answers and notes and usernames and passwords for access to our recruitment portal.

Personal Data Category	Description of Personal Data
Referee Data	We will collect Personal Data relating to the referee's provided by You, including their name, Contact Data and their opinions about You
Religious Data	Religious Affiliation Data (applicable only to employees of STS Group Switzerland AG, where employees may declare their religious affiliation, or indicate that they do not belong to any religious faith, as this information is required for Swiss taxation purposes only)
Social and Marketing Data including images	This includes Personal Data relating to the social and business-related activities and includes, Contact Data, Travel Data, limited Health Data, LinkedIn data, photographs, limited Employee Role Data, birthdays. Images, videos or company employment details (such as name, email and a short personal profile) collected for use on our website or social media platforms such as LinkedIn, Facebook, Twitter; and images or videos collected during corporate events, celebrating achievements or taking part in charity activities with the company.
Special Category Data	We may also process Personal Data that is of a special category per the GDPR definition: this can include data such as, religion, racial or ethnic origin, trade union membership, biometric data for identification, or Health Data
Time & attendance data	This is Personal Data relevant to the management of employee & contractor attendance and includes Identification Data, times of working hours including start and finish times, periods of rest, work schedule/roster, facial scans
Trade Union Data	Trade Union Membership details
Training Data	This includes Contact Data, training reports, training history, assessment results and details of education and academic record
Travel Data	This includes Identification Data, Contact Data, travel dates, times, locations and other travel related information
Vehicle Data	This includes vehicle registration details, vehicle tax and insurance details

1.13 Data Record

Processing Activity	Category of Personal Data	Purpose of processing	Legal Basis Description	External/3 rd Party Recipients [INCLUDES TRANSFERS TO ANY OTHER STS Group Companies WHERE APPLICABLE]
Assessment of Work environment/ Fitness for work / Occupational Health Checks	Health Data Identification Data Contact Data	- To assess the working environment of each Employee - To assess the Employee's fitness for work - To prevent and manage injuries related to individual workstation set ups and ensure end users are educated, and all equipment is compliant with EU and Irish Health and Safety Regulations	- To assess, subject to appropriate safeguards, the working capacity / suitability of the employee and to carry out obligations and exercise rights under employment law. - To comply with the contract of employment - To comply with the Health & Safety at Work Act 2005. - Processing is necessary for assessment of the working capacity of the employee	- HR and other consultants, as required (e.g. HR, and Legal in the event of Legal proceedings, occupational health specialists/assessors, insurers). - Ergonomic Assessors - Revenue Commissioners./ EU Tax Authorities As required: - Department of Social Protection - Workplace Relations Commission (WRC) - Trade Union. - IT hosting and service providers - HR Portal Provider
Apprenticeship Management	Identification Data Contact Data Education Training & Results	Details are processed as part of the conditions of employment so as to they can join the Apprenticeship Program run by the company.	To comply with the contract of employment	ETBs?
CCTV	CCTV Images / related secondary data such as date and time and location	For the security and protection of our business as documented in the CCTV Policy and notices.	- In our legitimate interest to ensure the security of our premises and our equipment and in limited circumstances for disciplinary purposes where such interests are not overridden by the rights and freedoms of employees. - Employees should refer to the CCTV policy for more information about our use of CCTV systems.	- The Personal Data may be shared with organisations providing products and services such as HR advisors, legal advisors, CCTV system providers. - The Gardai to support reporting and/or investigation of suspected crime.
Complaints Management/ Dignity at Work	Contact Data Policy Compliance Data Complaints Data Communications Data	- To ensure employee complaints are properly and fairly reviewed and investigated and to comply with HR / Grievance policies - Industrial relations management- to resolve potential/existing conflict in a mutually beneficial manner	- To comply with the requirements of the contract of employment to apply fair investigations and comply with obligations. - In our legitimate interests to fully investigate complaints and apply disciplinary procedures in circumstances where such interests are not overridden by the rights and freedoms of employees. - For our legitimate interests to resolve industrial relations issues in circumstances where such interests	- HR and other consultants, as required (e.g. HR, and Legal in the event of legal proceedings). As required: - Department of Social Protection, - Workplace Relations Commission - Trade Union. - IT hosting and service providers - Union Officials

Processing Activity	Category of Personal Data	Purpose of processing	Legal Basis Description	External/3 rd Party Recipients [INCLUDES TRANSFERS TO ANY OTHER STS Group Companies WHERE APPLICABLE]
			are not overridden by the rights and freedoms of employees. - The processing is necessary for the establishment, exercise or defence of legal claims - for the assessment of the working capacity of the employee - The processing of data is necessary for compliance with a legal obligation	- IBEC - WRC - Legal Representative - External Consultants
Employee Payments	Finance & Tax Data Time/Attendance data Identification Data Contact Data Biometric Data	- To pay Employees (including salary, bonus and gifts) and to ensure compliance with employment and revenue laws. - To offer employee additional benefits such as support for social activities, participation in travel schemes and other health and wellness benefits. - To verify time and attendance Note: Some benefits may require you to provide personal data concerning family members, partners or next of kin, in which case you must inform them before providing it to us.	- The processing is necessary to comply with Employment laws and revenue requirements. - The Organisation is also required to process this Personal Data as part of the contract of employment to ensure that the Employee is paid. - In our legitimate interest to pay bonus and gifts to employees where such interests are not overridden by the rights and interests of employees	- HR and other consultants, as required (e.g. HR, and Legal in the event of Legal proceedings, auditors, financial pension and health insurance providers). - Revenue Commissioners. As required: - Department of Social Protection, the WRC - Trade Union. - IT hosting and service providers - HR Portal Provider - TaxSaver Schemes - Gift Card Provider
Employment Termination	Exit Data	- To effectively manage the termination of the employment relationship - Organisation reporting and process improvement	- For our legitimate interests to properly manage the termination of the employment relationship in line with our policies in circumstances where such interests are not overridden by the rights and freedoms of employees. - for the contract of employment.	- HR and other consultants, as required (e.g. HR, Legal in the event of Legal proceedings) providing services. - Revenue Commissions. - As required: - Department of Social Protection, - WRC - Trade Union. - IT hosting and service providers
Expenses Payments	Expenses Data	- To pay the Employee expenses that are due - To verify expenses	To comply with the contract of employment. To ensure compliance with the expenses policy	- HR and other consultants, as required (e.g. HR, and Legal in the event of Legal proceedings, auditors) - The WRC (Workplace Relations Commission). - Trade Union.

Processing Activity	Category of Personal Data	Purpose of processing	Legal Basis Description	External/3 rd Party Recipients [INCLUDES TRANSFERS TO ANY OTHER STS Group Companies WHERE APPLICABLE]
				- IT hosting and service providers - HR Portal Provider
Fleet Management / Parking	Contact Data Identification Data Vehicle Data Insurance Data Travel Data Expenses Data Finance & Tax Data	- to manage and insure corporate vehicles - to provide parking for staff - to ensure health and safety - to monitor vehicle locations where required - To manage expense claims, employee mileage tracking, fuel usage, journey auditing, payroll mileage reimbursements, and related revenue compliance requirements	- For our legitimate interests in managing corporate vehicles in circumstances where such interests are not overridden by the rights and freedoms of employees. - For our legal obligation where processing is necessary to comply with applicable insurance, payroll, taxation, accounting, and record-keeping obligations	- HR and other consultants, as required (e.g. Legal, finance, insurers). - Tax and regulatory authorities - Auditors - Service providers
Health & Safety Accident / Incident reporting	Identification Data Health Data Contact Data Comms Data	To ensure the health, safety and wellbeing on our premises and take proactive action in line with relevant legislation	- The processing of data is necessary to carry out legal obligations - The processing of personal data is necessary for the performance of the contract of employment. - To comply with the Health & Safety at Work Act 2005.	- Insurance Company - Third party assessors - Lawyers
HR Reporting	Contact Data, Identification Data, Finance & Tax Data, Leave Data, Employee Role Data, Communications Data, Performance Data, Policy Data	To manage the HR functions and report to board on activities	In our legitimate interest to manage and administer the HR Function where such interests are not overridden by the rights and freedoms of employees	- HR System Service providers - HR and other consultants, as required
Gender Pay Gap Reporting	Salary & Bonus Data Gender Data Maternity/Adoptive/Parental Leave Data	To compile and publish a Gender Pay Gap report on the organisation's website and to upload the report to the government's centralised GPG portal	To comply with the Gender Pay Gap Information Act 2021 and associated Regulations	- Website administrators - Government Gender Pay Gap Reporting Portal
STS Operations & Comms	Email, Messaging, System/Applications, Communications incl Meetings, Calls, Transcripts	- To record communications and manage its business - To support any complaints, grievances, harassment reports, disciplinary procedures, as relevant	- In our legitimate interest to manage our business and operations - To comply with the contract of employment	The Personal Data may be shared with organisations providing products and services such as HR advisors, legal advisors, IT security advisors, IT system and product providers.

Processing Activity	Category of Personal Data	Purpose of processing	Legal Basis Description	External/3 rd Party Recipients [INCLUDES TRANSFERS TO ANY OTHER STS Group Companies WHERE APPLICABLE]
Internet, Systems and Product Use	Internet, Systems & Product Use Data, Employee Badge/Swipe	- Ensure that Employees use the internet and products (hardware/software) in accordance with policies. - To control physical access to the workplace. - To support secure remote access to IT systems - To verify Time and Attendance	For our legitimate interests to manage employee performance and measure use and ensure the security of product and internet systems in circumstances where such interests are not overridden by the rights and freedoms of employees.	The Personal Data may be shared with organisations providing products and services such as HR advisors, legal advisors, IT security advisors, IT system and product providers.
Insurance requirements Management	Insurance Data Contact Data Insurance Data Health Data	Management of the insurance policies maintained through STS Group, including holiday, pension, motor and health insurance policies. Payroll and employee management	- For our legitimate interests in managing the business in circumstances where such interests are not overridden by the rights and freedoms of employees. - To comply with the contract of employment	The Personal Data may be shared with organisations such as HR consultants, legal advisors, pension administrators & advisors, pension trustees and insurance companies.
Investigation of complaints e.g. from clients	Identification, Contact, Communications Data Internet & Systems Data, Operations & Comms Data Health Data	To investigate complaints/resolve disputes /verify compliance with policies & procedures/conduct fraud investigations.	- In our legitimate interests to investigate complaints/resolve disputes/verify compliance with policies & procedures/conduct fraud investigations in circumstances where such interests are not overridden by the rights and freedoms of employees. - Where health data is processed, we will ensure compliance with the additional requirements of Article 9 GDPR relating to special category personal data.	- HR and other consultants, as required (e.g. Legal, finance, insurers). - Internal/external monitoring & investigation team(s), IT support, system and product providers
Leave Management	Identification Data Employment Data Health/Medical Data Next-of-Kin Data Leave Data	- To process leave applications in accordance with policies & legal obligations - To manage periods of sick leave	- The processing of personal data is necessary for the performance of the contract of employment. - The processing of personal data is necessary for compliance with a legal obligation. - The processing is necessary to comply with Employment, social security, social protection law Relevant Legislation: Maternity Protection Act, 1994 and the Maternity Protection (Amendment) Act 2004 Parental Leave Acts 1998-2006 European Union (parental Leave) Regulations 2013 Carers Leave Act, 2001 Health and Safety at Work Act 2005 DPER Circulars	- HR and other consultants, as required (e.g. Legal, finance, insurers). As required: - Department of Social Protection, - WRC (Workplace Relations Commission). - Trade Union. - Construction Workers' Pension Scheme(CWPS)

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Onboarding new employees (Induction)	Contact Data, Identification Data, Communications Data, Finance & Tax Data, Next of Kin Data, Religion, Trade Union, Biometric, Health	- To onboard the employee when they begin employment - To register the employee with the relevant authorities / bodies as needed - To analyse and monitor the diversity of the workforce in accordance with applicable laws. This includes, for example, compliance with equal opportunity employment laws.	- For the purposes of entering into the employment contract and for our legitimate interests to ensure that the employee understands our policies and procedures of in circumstances where such interests are not overridden by the rights and freedoms of employees. - Trade Union - Religious Affiliation Data (applicable only to employees of STS Group Switzerland AG, where collection of this information is required for Swiss taxation purposes).	- HR and other consultants, as required (e.g. HR and Legal in the event of Legal proceedings). - Revenue Commissioner, - Regulatory, legislative, and judicial bodies as required. As required - Department of Social Protection - WRC (Workplace Relations Commission). - Trade Union. - IT hosting and service providers - HR Portal Provider
Onboarding new employees (Offer)	Contact Data, Identification Data, Communications Data, Recruitment Data, Referee Data, Health Data, Employee Role	- To make an offer of employment - To perform a background check - To verify eligibility to work in Ireland	- The Personal Data is necessary for the purposes of offering a contract to the employee and for our legitimate interests in managing an effective recruitment process in circumstances where such interests are not overridden by the rights and freedoms of employees. - The processing of data is necessary for compliance with a legal obligation - for compliance with a legal obligation	- HR and other consultants, as required (e.g. HR and Legal in the event of Legal proceedings). - IT hosting and service providers. - HR Portal Provider - Background check service provider
Organisation of business travel	Identification Data, Contact Data, Travel Data Social and Marketing Dat	To manage Employee related travel for business and social events related to the business	- For our legitimate interests to manage Employee travel activities in circumstances where such interests are not overridden by the rights and freedoms of employees. - To comply with the contract of employment	- HR and other consultants providing services including travel advisors - IT hosting and service providers
Performance Management	Performance Data Identification Data Employee Role Data	To manage performance in accordance with HR policies	For the performance of the contract of employment and in our legitimate interest to manage Employee performance in circumstances where such interests are not overridden by the rights and freedoms of employees	- HR and other consultants, as required (e.g. HR, Legal in the event of Legal Proceedings). - Revenue Commissioners. As required: - Department of Social Protection, - WRC (Workplace Relations Commission). - Trade Union.

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Policy Administration	Contact Data, Policy Compliance Data	To administer and manage compliance with STS Group policies and procedures	In our legitimate interest to manage and administer its policies where such interests are not overridden by the rights and freedoms of employees	IT hosting and HR management system service providers
Relationship Management	Contact Data, Identification Data, Finance & Tax Data, Leave Data, Employee Role Data, Communications Data, Performance Data, Policy Data	- These details are collected for the purposes of managing the relationship with the Employee, for the purpose of the contract with the Employee and to ensure adherence to employment and revenue laws. - The data may be used in the case of any merger or acquisition activity. - To allow employees, HR and management team to engage with the online HR platform where applicable.	- The processing is necessary to comply with Employment laws and revenue requirements. The Organisation processes this Personal Data as part of the contract of employment. - Emergency contact details are collected to protect employees' vital interests in the event of an accident or an emergency. - The Personal Data may also be used for the purposes of legal claims. - For our legitimate interests in managing the business in circumstances where such interests are not overridden by the rights and freedoms of employees. - In the case of merger/acquisition activity, for our legitimate interests in managing the business in circumstances where such interests are not overridden by the rights and freedoms of employees.	- HR and other consultants, as required, (e.g. HR and Legal in the event of Legal proceedings). - Revenue Commissioner. - Regulatory & Legislative Reporting, as required. As required: - Department of Social Protection, - WRC (Workplace Relations Commission). - Trade Union. - The information may be shared with investors or any purchaser in the case of any merger/acquisition situation - IT hosting and service providers - HR Portal provider
Remote working arrangements for Employees	Identification Data Contact Data Communications Data Internet and Product Use Data Health Data	- To provide employee with appropriate systems and equipment to support remote working and to manage employee performance under such arrangements. - To ensure that we can assess the working environment for employees - To facilitate online meetings allowing continuity within the business	- For the performance of the contract of employment and in our legitimate interest to provide flexible working arrangements in circumstances where such interests are not overridden by the rights and freedoms of employees. - To comply with the contract of employment - To comply with the Health & Safety at Work Act 2005.	- Meeting Platforms - Hosts and service providers - HR and other consultants providing services including occupational health specialists and training providers. - Supplier of Office Equipment & PPE
Sales & Tenders	Contact Data Social & Marketing Data	To promote our business and tender for new business	For our legitimate interests to manage corporate communications and sales and marketing activities in circumstances where such interests are not overridden by the rights and freedoms of employees.	Customers/prospective customers
Sales & Marketing Events	Social & Marketing Data Contact Data Communications Data	To manage corporate communications, business sales and marketing and for corporate social events	For our legitimate interests to manage corporate communications and sales and marketing activities and social events in circumstances where such interests are not overridden by the rights and freedoms of employees.	The Personal Data may be shared with organisations providing services such as event organisers, photographers, marketing companies, hotels, restaurants and activity companies.

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	Identification Data			
Social Events	Contact Data, Identification Data Health Data	To facilitate the organisation of social events and activities	- In our legitimate interest to facilitate the organisation of social events and activities - With the Employees "explicit consent" in the case of Health Data collected in the case of dietary requirements	- Event Organisers - Accommodation Providers - Activity Providers
System Security & Access Control Management	Identification Data Contact Data Employee Role Data Employee Badge / Swipe Card Data	For security, administration and compliance purposes	For our legitimate interests in managing the business and ensuring security in circumstances where such interests are not overridden by the rights and freedoms of employees.	- The Personal Data may be shared with organisations providing products and services such as HR advisors, legal advisors, IT security advisors, IT system and product providers. - IT hosting and service providers including Swipe Card System / Employee Badge Provider - Internal/external monitoring & investigation team(s).
Training	Training Data	- To manage training - To ensure compliance with policies and procedures and ensure suitable training is provided	- For the performance of the contract of employment and in our legitimate interest to manage Employee performance and ensure suitable training is provided in circumstances where such interests are not overridden by the rights and freedoms of employees - To comply with the contract of employment	- HR and other consultants providing services including, training companies. - IT hosting and service providers

Signed:



Date: 07-10-2026

Richard Hogan
Group Managing Director
STS Group

Policy

STS Group Employee Privacy

Master data:

Type of regulation:	Policy
Scope of application:	STS Group
Document number:	STS-1-1.7-001
Document owner:	HR Department
Version:	4.0
Status:	Approved
Classification level:	Public
Effective date:	07.10.2026

Brief description:

This Data Protection Policy provides information to you about how we process Personal Data and sets out the basis on which any Personal Data we collect from You, or that You provide to Us, will be used by Us where We are controllers of that Personal Data for the purposes of the GDPR.

The protection of your Personal Data is important to Us and We are committed to protecting and safeguarding your rights

Approval:

Name	Position / body	Approval date
<i>Richard Hogan</i>	<i>STS Group Managing Director</i>	<i>07.10.2026</i>

2 Purpose

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3 Scope of application

The scope of this Policy is: **"STS Group"**. This Policy is valid for all companies of the STS Group.

A list of the companies within the scope of application can be found in the current "Overview scopes of application and legal entities - Dussmann Group" ([Group-5-1.5-001](#)).

4 Annexes and Associated Documents

4.1 Annexes

- No Appendix

4.2 Associated Documents

- STS-2-1.7-001 Group Website Data Protection

5 Changes to previous versions

Version	Changes	Deleted	Added	Author	Effective Date
1.0	Template adjustment to new SOP requirements	EPP 01 issue no. 07	all	BM, PW	19.09.2023
2.0	France added to list of companies within STS Group		Additional entity added to section 3	BM, PW	18.07.2024
3.0	Document was fully revised		All	BM, PW	18.08.2025
4.0	Additional information added to Data Record; definitions	STS Group Privacy Policy deleted, as it has now been combined into this policy .	Additional information added to Data Record; definitions	Fort Privacy	07.10.2026