

OUR HR PRIVACY POLICY

This fact sheet is part of Crayon's proactive communications strategy on **Information Security and Data Protection (ISDP)**.

This fact sheet aims to provide you with a concise summary of Crayon's **Human Resources (HR) Privacy Policy**, which is applicable to current team member, contractors, consultants, agency staff and applicants.

While we may need to amend our HR Privacy Policy from time to time, you can always find the latest version of it on our website. For further information, please contact our Data Protection Officer (DPO): dpo@crayon.com

Our Obligations

Data Collection: We collect your personal data to comply with employment laws and execute on critical functions such as HR, Payroll, and IT – *Safeguards: Processing Guidelines and DPO monitoring.*

Data Access/Storage: Your data may be handled by HR, Payroll, IT, and your managers – *Safeguards: technical and organisational security measures which are regularly reviewed and enhanced.*

Data Sharing: Your contact details may be provided to customers, partners and/or suppliers to fulfil our contractual obligations under service/product support – *Safeguards: Data Processing Agreements and DPO audits.*

Your personal data may be disclosed to government authorities, judicial authorities, and/or law enforcement upon a legal request – *Safeguards: notification when permitted and DPO oversight.*

Your personal data may be provided to a third party in the event of a merger or acquisition – *Safeguards: anonymisation where possible, Data Processing Agreements and DPO monitoring.*

Data Retention: Your personal data is kept only for as long as it is necessary for us to comply with legal obligations.

Sensitive Data: Your sensitive data can only be processed upon your consent or it is subject to a sensitive data condition. Sensitive data may be stored for compliance with statutory obligations or for occupational health purposes. If it is collected for a security background check, we only store and share information related to the outcome of this check. Your data may be collected in video surveillance material that is provided to law enforcement in criminal investigations. Where video surveillance is in use, this will be signposted clearly – *Safeguards: anonymisation where possible, Processing Guidelines, DPO oversight, monitoring and audits.*

Accessing Your Data: It is your right to receive a transcript copy of your personal data held by us, in accordance with legislation, which does include exemptions for certain types of information. If you wish to make a Subject Access Request, we kindly ask you to send it to our DPO with a clear description of the information you seek – *Enablers: Your line managers and the DPO.*

Your Obligations

Confidentiality + Data Protection: You must uphold strict confidentiality and security when processing personal data – *Reference: Crayon IT Use and Data Processing Policy.*

You must remain up-to-date on our ISDP practices and requirements by participating in the training and awareness material we provide – *Reference: Crayon mandatory training.*

You must maintain data protection and professional confidentiality regarding all matters relating to us and our business during your employment and after the end of your contract – *Reference: Crayon Confidentiality and Privacy Agreement.*

Breaches of data protection and professional confidentiality constitute a material breach of your employment agreement, which may result in additional training for corrective actions. Breaches resulting from malicious actions or gross negligence may result in termination of employment and legal action.

You must notify HR within 30 days of changes to your personal data or circumstances to ensure your personnel records accurate.

Health and Safety: We aim to provide a safe, comfortable working environment. You should report any accidents or injuries at your workplace to your assigned Health + Safety or HR Manager. This assigned manager will assist you in receiving the medical attention you need, registering the incident, and informing line managers of your absence. We do not record your medical data.

End of Processing: Upon end of contract or the replacement of assets, you must ensure:

- You return all hardware belonging to Crayon (i.e. devices, peripherals etc.)
- You erase your personal data from all hardware used during your employment with Crayon
- You return all keys which enable access to personal data (i.e. access cards, passcodes, etc.)
- You return any printed documents or materials in your possession

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