

**PRA [Employee] Information Notice given under Article 13 of the GDPR**

In accordance with Article 13 of the 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 (hereinafter the “**GDPR**”), PRA Iberia, S.L.U. **informs you that:**

1. **The Data Controller** of your personal data is *PRA Iberia, S.L.U.*, located at *Madrid, calle Albasanz, 16, 3ª planta* (hereinafter “*we*”, “*our*” and “*us*”)
2. **Contact point** for matters concerning data protection:
  - a. *Madrid (28037) calle Albasanz, 16, 3ª planta*
  - b. *rrhh@pragroup.es*
  - c. *910323896*
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
    - i. We will process your personal data when it is necessary for the performance of the employment relationship. Typical activities are: recruitment; general human resources administration and management; recording of working time; administration and payment of wages, salaries, pensions and other benefits with deductions;
    - ii. To ensure compliance with Company policy and/or legislation in relation to health and safety and other employment matters; analysis for 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 and or background screening checks.
    - iii. The administration of funded pensions and other benefits or administration of pension schemes and or benefits. Typical activities are: 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 the Company’s diversity and inclusion policies. 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 the Company is subject in the conduct of its 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 the Company’s 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 *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.
  - ii. Pursuant to article 6 (1) (b) of the *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 make it impossible for PRA Iberia S.L.U.

to fulfil some or all of its obligations regarding the employment relationship, including those related to payroll, social security contribution, tax and insurance.

- iii. Pursuant to article 6 (1) (c) of the GDPR, we will process your personal data when it is necessary for the purposes of complying with legal obligations to which PRA Iberia, S.L.U. is subject. You are obliged to provide this information. Failure to provide this information may result in the Company failing to adhere to your statutory payment rights.
- iv. Pursuant to article 6(1) (f) of the 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 and that it is not overriding the interests or fundamental rights and freedoms of the data subjects.

**4. Special categories of personal data:**

- a. **Our legal basis** for processing special categories of personal data is:
  - i. Pursuant to PRA Iberia, S.L.U. personal data processed by the Company may include special categories of personal data (“**Special Categories**”) as defined under applicable law. Special Categories will only be processed where and in the matter permitted by applicable law.
  - ii. Article 9(2,a) of the GDPR in case of your explicit consent
- b. **We will process the following information relating to special categories of personal data and data source**
  - i. Religious, ideological, related views or activities, sexual orientation or racial ethnic origin, health related issues.
  - ii. Biometrical data for access to PRA Iberia, S.L.U. premises and presence control.
- c. The abovementioned data **has been received from employee.**

**5. Data recipients**

- a. For the abovementioned purpose(s) we can transfer your data to the following recipients: (i) to any of our related affiliates within the PRA Group of companies; (ii) payroll providers (iii) to any agencies or other third parties that provide us with services, including 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 subpoena 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 to a recipient in a third country<sup>1</sup> for the performance of the contracts.** We may transfer your personal data on the basis of a decision of the European Commission stating the appropriate level of protection, standard data protection clauses or, where applicable, on the basis of the Privacy Shield program between the EU and the United States. You have the right to obtain from us confirmation of the conclusion of appropriate contractual arrangements.

**6. 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 the company. 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. The Company 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.

- a) (i) Please see the Company’s Record Retention Policy for specific timeframes on the Company’s intranet site; see Policy Hub (Europe) – Human Resources.

**7. 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 GDPR;
- Rectify your personal data - Article 16 of the GDPR;
- Erasure (right to be forgotten) - Article 17 of the GDPR
- Restriction of processing - Article 18 of the GDPR
- Right to data portability - Article 20 of the GDPR
- Right to object to processing - Article 21 of the GDPR
- Right to not to be subject to a decision based solely on automated processing including profiling – Article 22 of the GDPR

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

If you believe that the processing of your personal data is unlawful, you have the right **to make a complaint** to

<sup>1</sup> A third country is a country located outside the European Economic Area (“EEA”), including the United States of America, which may not have data protection laws equivalent to those in the EEA. 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.

the competent supervisory authority. The name and address of the competent supervisory authority is the following:

Agencia Española de Protección de Datos  
c/ Jorge Juan, 6  
Madrid  
28001

**8. Right to withdraw a 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 providing it will not affect the lawfulness of processing based on consent before its withdrawal. If you wish to withdraw your consent, please contact your local Human Resource department.