

# BBPM Life dac EMPLOYEE DATA PROTECTION NOTICE



# **Employee Data Protection Notice**

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Dear Employee,

This Employee Data Protection Notice (also "**Notice**") aims to inform all employees BBPM Life dac (also "BBPM Life" or the "**Company**" or "**we**" or "**us**" or "**our**") about the personal data we collect and process in connection with your employment.

In particular, it sets out an explanation of what information about you we process, why we process such information, with whom your information is shared and a description of your rights with respect to your information.

This notice applies to current and former BBPM Life employees.

For the purposes of this Notice, BBPM Life is the Data Controller of your personal data.

If you have any queries about this notice or the personal data we process about you, please contact our Data Protection Officer at DPO@bbpmlife.com

#### 1. What information do we process and which source do we use?

"Personal data" is any information about a living individual from which they can be identified.

We collect and process information about you during the recruitment process, during our employment relationship and following the termination of our employment relationship.

You are responsible for keeping your personal details updated on the HR system in use e.g. change of address.

If you are external staff<sup>1</sup>, the type of personal data we process is limited to what is needed to manage your engagement with BBPM Life and access to BBPM Life facilities and information systems.

#### What information do we process:

The data we collect can include the following, but is not limited to:

**Name and contact data**. Your first and last name, employee identification number, FOB code, email address, postal address, phone number, emergency contact details, and other similar data.

**Demographic data.** Your date of birth. We may also request information about your physical or mental condition to provide work-related accommodations, to manage absences from work, to comply with employer's legal obligations, to allow the Company to assess your fitness to work and to manage occupational health assessments. Other "special categories of data" about you might be processed in accordance with local requirements and applicable law.

 $<sup>^{1}</sup>$  Means BBPM Life employees who are employed by an entity other than BBPM Life and who perform work on behalf of BBPM Life.



**National identifiers.** Your national ID/passport, residency and work permit status, PPS number, or other identification number <sup>2</sup>.

**Employment details.** Your job title/position, office location, employment contract, offer letter, hire date, termination date, performance history and disciplinary records, working hours, leave of absence, sick absence.

**Grievance, disciplinary and bullying & harassment investigations details.** Employee complaint, investigation meeting notes, witness statements.

**Spouse/partner and dependents' information.** You may opt to provide BBPM Life with additional information about your spouse/partner and dependents' first and last names, dates of birth, and contact details.

**Background information.** Academic and professional qualifications, education, CV/Resume, credit history and self-certified criminal records data (utilized for background check in accordance with applicable law).

**Financial information.** Bank account details, tax information, salary, retirement account information, company allowances and other information necessary to administer payroll, taxes and benefits.

**Workplace, Device, Usage, and Content data.** Electronic communications transmitted within our corporate network, information system access, BBPM Life device, system and application usage when accessing and using BBPM Life corporate buildings, services and assets.

#### Which source do we use

Personal data is normally obtained directly from you. In certain circumstances, it will, however, be necessary to obtain data from third parties, for example:

- Your line manager
- From external third parties such as references from previous employers
- The Revenue.

### 2. How do we use your information?

The information we hold and process is used for management and administrative purposes. We keep it and use it to:

- Manage our employment relationship with you
- Comply with legal obligations
- Protect employees' rights and interests
- Enable us to run our business
- Protect our legal position in the event of legal proceedings against the Company.

<sup>&</sup>lt;sup>2</sup> The Company doesn't retain copy of your national ID/passport.



We will only use your personal data that are adequate, relevant and limited for the purposes for which we collected it. Where there is a need to process your data for a purpose other than those provided in this notice, we will inform you of this and provide you with the legal basis which we rely upon to process your data.

The uses we make of each category of your personal data, together with the legal bases we rely on for those uses are set out in more detail in Section 5 of this notice.

#### 3. Security of data

Your personal data shall normally be stored on the HR electronic database in the cloud.

The Company will ensure that only authorized personnel have access to an employee's personnel file (e.g. the employee's manager may have access to certain personal data where necessary).

The Company has appropriate security measures in place to protect against unauthorized access. These security measures include the following:

- 1. The perimeter of the Company is defined, and all access points are controlled either by security staff or by the access detection system
- 2. Only management and authorized employees are allowed to use technological assets outside the Company
- 3. Computer users need authentication; computer systems and files are accessed on a need to know bases
- 4. Software periodically establishes whether new security patches are available and installs those detected.

#### 4. How is your information shared?

Your information may be disclosed to third parties where we are legally obliged to do so or where our employment contract requires or permits us to do so. For example, we pass on certain information to:

- The Group or Group's companies,
- Third parties that act on behalf of the Company (e.g. cloud providers, payroll provider, health and safety provider, insurance providers and their sub-contractors)
- Advisers and auditors (e.g. external lawyers, accountants, management consultants, occupational doctors)
- Professional bodies (e.g. Law Society of Ireland)
- Employment benefit providers (e.g. pension scheme, insurance companies)
- Sources of risk intelligence if required
- Authorities (e.g. CBI, Revenue)
- Public transport providers (e.g. Luas)
- Persons acting on the employees' behalf
- Adverse parties in litigation (e.g. as necessary to establish, exercise or defend against potential, threatened or actual litigation)
- Any other person authorised by law to access employees' records
- Third parties that provide training services
- Certification bodies (e.g. ACOI, ACCA)
- Other providers (e.g. Vodafone)



or otherwise in accordance with data protection laws

When the Company discloses your personal data to third parties, we only disclose data that is necessary for them to provide their service. We have contracts in place with these third parties requiring them to keep your personal data secure and not to use it other than in accordance with our specific instructions.

#### 5. Purpose and legal basis for processing

We process your personal data (and, where necessary, data for other individuals associated with your employment) that are necessary for the varied purposes set out below. Failure to provide your personal data when requested may prevent us from being able to carry out these tasks and/or comply with our legal obligations.

#### a) To administer your employment contract or other commitments we've made to you

We process your personal data primarily for the purpose of managing our employment or working relationship with you, and to fulfil our obligations under your employment contract, or applicable BBPM Life policies, including payroll and benefits administration. A few examples: your employment contract, promotion history and performance reviews (e.g. so we can manage our employment relationship with you), and your bank account and salary details (e.g. so we can pay you or provide HR benefits).

## b) Other overriding and legitimate business purposes

We may process your personal data when it is necessary for other legitimate purposes, such as general HR administration, Group's internal administrative purposes, recreational activities, general business management and operations, management of network and information systems security and business operations, provision and improvement of employee services and others. We may also process your personal data to investigate potential violations of law or breaches of our internal policies.

Based on legitimate business purposes, BBPM Life may store data after the termination of the employment relationship, to exercise or defend against potential, threatened or actual complain and/or litigation.

#### c) Legally required purposes

We also process your personal data when it necessary for complying with laws and regulations, including collecting and disclosing personal data as required by law (e.g. for working time, tax, health and safety, anti-discrimination laws), under judicial authorization or to exercise or defend the legal rights of BBPM Life.

# d) Other uses of your data

BBPM Life avails itself of Microsoft services. Microsoft may process metadata about you and your usage of and interaction with Microsoft products, services and internal applications and tools, when you use them to conduct BBPM Life business, to measure and improve these products; use



of your data for product improvement may include human and machine review of such data to train AI models and improve machine learning for Microsoft products and services.

#### 6. Workplace Security

BBPM Life provides devices and internet access to enable employees to carry out business operations. Activities performed on the devices and history of internet usage is collected and stored for security purposes.

The purpose of the monitoring of your use of BBPM Life IT assets is described in our IT and Cybersecurity Policy.

#### 7. Is your information transferred abroad?

We may transfer your personal data to our Group within the European Economic Area ("EEA") for purposes connected with your employment or the management of the company's business.

Some of our suppliers who provide us with services such as IT security or data hosting services (e.g. Microsoft Azure), may process your personal data outside the EEA where privacy laws may not be as protective as those in your jurisdiction. There are special requirements set out under Chapter V of the GDPR to regulate such data transfers and ensure that adequate security measures are in place to safeguard and maintain the integrity of your personal data on transfer.

Where we transfer your personal data outside the EEA to our suppliers, we will make sure that it is protected to the same extent as in the EEA and we will use at least one of the following safeguards:

- Transfer it to a non-EEA country with privacy laws that give the same protection as the EEA
- Put in place a contract with the recipient that means they must protect it to the same standards as the EEA.

### 8. How long do we keep your information?

Personal data will be stored according to applicable laws or regulatory requirements and kept as long as is necessary to fulfill the purposes for which the personal data was collected. The Company also stores certain data to protect its legal position in the event of legal proceedings. Generally, your personal data will be retained as documented in our Data Retention Schedule (e.g. your employment records such as contracts, evaluations, appraisals, appointments will be stored for 7 years after the termination of the employment).

#### 9. Will you be subject to profiling or automated decision making?

You will not be subject to automated decision making or profiling.

#### 10. What are your rights under data protection law?

The rights listed below may be exercised at any time by submitting a request in writing to the attention of the data protection officer at DPO@bbpmlife.com. If you are a former employee, the Company may first have to verify your identity.



The Company is obliged to respond to requests within one month from the date of receipt <sup>3</sup>. The Company also reserves the right to ask for clarification of the request received, in order to ensure a rapid and targeted assistance.

#### a) Right of access

You have the right to obtain from us information on the personal data we hold on you including the following:

- Purposes of the processing
- Type of personal data held
- Categories of recipients of the personal data
- Information on how long the data will be stored
- If automated individual decision making, including profiling, takes place, as well as information on the logic involved and consequences of this
- If data is not collected directly from you, information on the source of the data
- The existence of the right to request from us rectification or erasure of your personal data or restriction of processing of your personal data or to object to such processing
- The right to lodge a complaint with the Data Protection Commission.

If you wish, you may also ask the Company for a copy of the personal data we have processed <sup>4</sup>.

There is usually no charge applied to access your personal data (or to exercise any of the other rights).

However, if your request is clearly unfounded, repetitive or excessive, we may charge a reasonable fee. Alternatively, we may refuse to comply with your request in these circumstances.

## b) Right to rectification

You have the right to have the Company correct any inaccurate personal data we have collected about you.

You also have the right to have incomplete personal data completed; you may provide us with supplementary information to do this.

## c) Right to erasure

In certain instances, you have the right to have the Company erase the personal data we have collected about you. This right will not apply where we are required to process personal data in order to comply with a legal obligation or where the processing of this information is carried out for reasons of public interest in the area of public health. You have the right to have your data erased where one of the following applies:

<sup>&</sup>lt;sup>3</sup> This time frame can be extended by up to two further months, considering the complexity of the request. The Company will let the applicant know before the expiry of the deadline, that an extension of time is required to deal with the request.

<sup>&</sup>lt;sup>4</sup> To ensure that any personal data is disclosed to the applicant, BBPM Life is obliged to investigate the content of its commercial o business e-mails as well as its Outlook Calendar.



- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- you withdraw consent on which the processing is based and where there is no other legal ground for the processing;
- you object to the processing and there are no overriding legitimate grounds for the processing
- the personal data have been unlawfully processed;
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.

#### d) Right to object

If you have reasons related to your particular situation, you have the right to object to the processing of your personal data at any time:

Where we process your personal data for the performance of a task carried out in the
public interest or for the purposes of legitimate interests pursued by us, except where we
can demonstrate compelling legitimate grounds for this processing which would override
your interests, rights and freedoms or in connection with the enforcement or defence of a
legal claim.

Should this occur, we will no longer process your personal data for these purposes.

## e) Right to restrict processing

You have the right to have the Company restrict the processing of your personal data where one of the following applies:

- You contest the accuracy of the personal data (we will restrict the processing of the personal data until we verify the accuracy of the personal data)
- The processing is unlawful and you oppose the erasure of your personal data
- The Company no longer requires the personal data for the purposes of the processing but the data is required by you for the establishment, exercise or defence of legal claims
- You object to the processing of the personal data as outlined in point d) above (we will
  restrict the processing of the personal data while we verify our legitimate grounds for the
  processing which may override your interests, rights and freedoms).

Where you have restricted the processing of your personal data, we will continue to store your personal data but will only process it with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of other people or for reasons of important public interest or other non-restricted purposes.

#### f) Right to data portability

You have the right to receive personal data concerning you which you have provided to us in a structured, commonly used and machine-readable format. You also have the right to provide this data to another controller or have the Company transmit this data to another controller on your behalf, where technically feasible. This applies to automated data only to the extent provided by you to us. This right to portability is limited to the following situations.



- Where the processing is based on the legal basis of consent or of entering into or performance of a contract and
- The processing is carried out by automated means.

#### g) Right to withdraw consent

Where we are processing your personal data on the legal basis of consent, you are entitled to withdraw your consent at any time. This does not affect the legality of the processing which took place when we had your consent.

#### h) Right to Complain

You have the right to lodge a complaint about how your personal data has been processed by us with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement. You also have the right to an effective judicial remedy if you consider that your rights under the EU General Data Protection Regulation ("GDPR") have been infringed as a result of processing by us.

Irish and Italian supervisory authority here below for your reference:

- Ireland: The Data Protection Commission, Homepage | Data Protection Commission.
- Italy: Garante per la protezione dei dati personali, Home Garante Privacy.

#### 11. Further information

If you have any query in relation to this data protection notice, or if you have any concern as to how your data is processed, please contact DPO@bbpmlife.com

# 12. Review

This data protection notice will be reviewed from time to time, at least on an annual basis, to take into account changes in the law and the experience of the notice in practice. This privacy notice was last updated 12 November 2025.