



Privacy Notice

Pierre Fabre Ltd., a company with a registered office located at One Fleet Place, London, EC4M 7WS. (hereinafter “Pierre Fabre”, “we” or “our”), take your data protection rights and our legal obligations seriously. Your personal data (as defined below) will be processed in a secure and confidential manner and only as set out below or otherwise notified to you in writing.

This Notice (hereinafter referred to as the “Notice”) supplements other policies which apply to you in the context of your employment relationship such as the Pierre Fabre Group Global Privacy Policy, and describes the categories of Personal Data we may process, how your Personal Data may be processed and how your privacy is safeguarded in the course of our relationship with you. It is intended to comply with our obligation to provide you with information about Pierre Fabre’s processing of your Personal Data under applicable data protection law.

Please help us to keep your data accurate by informing us of any change of name, address, or any other relevant change that may be relevant regarding the performance of your work agreement.

1. Why do we collect and process your Personal Data?

Pierre Fabre collects and processes your Personal Data for the purposes described in this Privacy Notice.

"Personal Data" means any information describing or relating to you as an identified or identifiable individual, as defined the General Data Protection Regulation (EU) 2016/679 ("GDPR") and the Data Protection Act 2018 (C12) (UK GDPR) and described in this Notice. An identifiable individual 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 individual.

Your Personal Data are collected and processed for various purposes, in accordance with applicable laws and any applicable collective bargaining agreements. Personal Data may occasionally be used for the purposes not anticipated by you where the circumstances warrant such use (e.g., in investigations or disciplinary proceedings). We may collect and process your Personal Data for various purposes, as set out in this Privacy Notice.

We have identified the following purposes for processing Personal Data. These purposes each relate to a lawful basis for processing, as required under applicable data protection law. These purposes include:

Purposes of employees Personal Data processing	Legal Basis
Administrative management of human resources including providing and administering remuneration, payroll, employee benefits and incentive schemes and for reimbursement of business costs and expenses and for making appropriate tax and social security contributions.	This processing is necessary to perform the contract between you and Pierre Fabre and comply with legal obligations to which Pierre Fabre is subject
Career management, including performance and career reviews as well as statistical analyses relating to personnel management, including bonus and profit-share schemes	This processing is necessary for the purpose of the legitimate interests pursued by Pierre Fabre. Pierre Fabre considers that it has a legitimate interest in managing its workforce and operating its business. This includes ensuring that employees are properly remunerated.
Work organisation (including tenders, client team records with use of photographic images, disclosure of CVs to respond to Request For Proposals etc.) and time management, Including attendance, absences, paid leave, sickness leave, managing claims, complaints, investigations and processes and other informal and formal HR processes and related to making management decisions.	This processing is necessary to perform the contract between you and Pierre Fabre and comply with legal obligations to which Pierre Fabre is subject This processing is also necessary for the purpose of the legitimate interests pursued by Pierre Fabre. Pierre Fabre considers that it has a legitimate interest in addressing employee related concerns and issues and resolving the same and

	complying with applicable laws and regulations.
Management of travel, lodging and related expenses	This processing is necessary to perform the Contract between you and Pierre Fabre.
Employees mobility and expatriate management	This processing is necessary to perform the Contract between you and Pierre Fabre.
Planning, due diligence and implementation in relation to a commercial transaction or service transfer involving Pierre Fabre that impacts on your relationship with Pierre Fabre for example mergers and acquisitions or a transfer of your employment under applicable automatic transfer rules;	This processing is necessary for the compliance with legal obligations to which Pierre Fabre is subject. This processing is also necessary for the purpose of the legitimate interests pursued by Pierre Fabre who needs to make decisions relating to the future of its business in order to preserve its business operations or grow its business.
Monitoring and management of access to Pierre Fabre premises (including video surveillance of Pierre Fabre premises).	It is Pierre Fabre's legitimate interest to ensure security of its premises and employees.
Vehicle tracking	It is Pierre Fabre's legitimate interest to ensure security of the vehicles and goods.
Professional whistleblowing mechanism	This processing is necessary for Pierre Fabre to comply with its legal obligations.
Training	This processing is necessary to perform the Contract between you and Pierre Fabre.
Allocation of IT resources (including allocation of equipment, intranet, organization chart, employee directory, management of emails) and provision of technical support and maintenance of the IT resources made available to employees or used for employees personal data processing (HRIS).	This processing is necessary to perform the contract between you and Pierre Fabre who has also a legitimate interest to ensure network security and good functioning of IT resources.

Landline and mobile telephone management	Pierre Fabre's legitimate interest to manage the mobile devices made available to its employees to ensure their security, loss prevention and maintenance.
Where relevant for publishing appropriate internal or external communications or publicity material including via social media in appropriate circumstances;	This processing is also necessary for the purpose of the legitimate interests pursued by Pierre Fabre to support its long-term business goals and outcomes and to promote its activity.
Management of litigations, offences and court cases with employees.	This processing is necessary to perform the contract between you and Pierre Fabre and for the compliance with legal obligations to which Pierre Fabre is subject. This processing is also necessary for the purpose of the legitimate interests pursued by Pierre Fabre . Pierre Fabre considers that it has a legitimate interest in protecting its organisation from breaches of legal obligations owed to it and to defend itself from litigation.
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	This processing is necessary to comply with Pierre Fabre legal obligations. Where not legally required, processing is necessary for the purpose of the legitimate interests pursued by Pierre Fabre who has a legitimate interest in co-operating with relevant authorities, government bodies or regulators for the provision of information where appropriate or legally required.
Storage of employees Personal Data	Legal obligations to comply with the applicable statute of limitations and respond to employees requests or claims

2.

What type of personal Data do we process?

We only process data that is strictly necessary for the purposes described in section 1 above.

As an example, you will find below a list of the categories of your Personal Data that we may process, depending on the purposes to be achieved by this processing:

- data relating to your civil status and identity, such as : surname and forename, personnel number or system ID reference, gender, date and country of birth and nationality;
- your social security number;
- data relating to your private life, such as your family related information as necessary for the purposes above mentioned, personal email address;
- data relating to your professional life, such as : starting date of contract, end date of contract, length of employment, details of work and position, work email address, leave information, department, scheduled working hours, data regarding career path, information on career plans, objectives, performance assessments and grading, CV, education, degrees, professional training, disciplinary data, honours, video surveillance images, badge data;
- economic and financial data (income, banking details, financial situation, tax situation, etc.);
- Sensitive or special categories of Personal Data: we normally do not collect sensitive or special categories of Personal Data except when required or allowed by applicable law (e.g. for medical check in the context of occupational medicine; work accidents, etc.)

- Data relating to criminal convictions and offences to the extent permitted by applicable law for certain job (e.g. security, financial services, information relating to vehicle infringement etc.) or to comply with our legal obligations and to defend ourselves from litigation,
- Connection data, data enabling connection to IT equipment, tracking of access for security purpose; data relating to use of telephone services, such as : telephone numbers, length of calls, date and time the calls began and ended.

Collection of this data is strictly necessary to enable performance of your contract and to ensure the satisfactory management of Pierre Fabre's human resources.

Pierre Fabre may collect your Personal Data directly from you on the basis of collection forms, official documents, CVs, general HR applications, or indirectly from other entities within the Group if you have previously worked in another entity of the Group, through head hunters or recruitment agencies and through devices or other means. If you provide Pierre Fabre with Personal Data about members of your family and/or other dependents (e.g., for emergency contact or administration of benefits), it is your responsibility to inform them of the conditions of their Personal Data processing (including disclosure and transfer) and their rights as set out in this Notice.

3.

Who can access your Personal Data?

Within the Group Pierre Fabre, your Personal Data are only accessible on a need to know basis.

More specifically:

Within the company, to the personnel of:

- HR department;

- facilities department;
- finance and legal department;
- Pierre Fabre's payroll staff;
- Pierre Fabre's IT department, for the purposes of maintenance;
- First and second-level management, in the case of data relating to employee performance in carrying out duties;
- Organizations representing employees for management of cultural and social activities;
- Work council if your Personal Data are required for the management of employees representatives' activities, elections and meetings.
- Outside the company, to the personnel of:
- The HR departments of Pierre Fabre Group subsidiaries;
- Third party service providers and vendors used for the abovementioned purposes (e.g. Phone operator, travel agencies, providers in charge of workplace and the Intranet, provider in charge of mailing boxes, service provider in charge of employee saving scheme, service provider in charge of luncheon vouchers, etc.);
- External providers of certain IT service regarding support and maintenance of the IT systems and HRIS.

Certain basic personal data, such as your name, location, job title, contact information and any published skills and experience profile may also be accessible to all employees notably through the Company's directory and internal social network and to the persons who have a relationship with Pierre Fabre.

With respect to the disclosures of Personal Data described above, Pierre Fabre:

- follows processes and procedures to ensure disclosures are only made available to internal personnel who are authorized to receive this information and who need the information to perform their job responsibilities;
- will provide Personal Data only to third party service providers that are authorized to receive and process this information and who have contractually agreed to (i) implement appropriate measures ensure the security of your Personal Data and/or (ii) process this information as instructed by Pierre Fabre

and as necessary to perform their services to Pierre Fabre and (iii) more generally meet all the requirement under applicable local laws.

In addition, please note that, in the event Pierre Fabre is sold or all or part of its business is otherwise transferred to a third party, you are informed that your Personal Data as collected and maintained by Pierre Fabre may be transferred to that third party, subject to applicable local law requirements.

Pierre Fabre may also disclose information about its employees in instances where we are required to do so by law, including pursuant to a court order or in circumstances where we believe that such action is necessary to prevent fraud or cybercrime or to protect the rights, property, or safety of Pierre Fabre or the Group or any person, in each case as required or permitted by applicable law.

4.

How do we protect your Personal Data?

Pierre Fabre takes reasonable measures to ensure protection against any unauthorized access to, and unlawful use of, employee Personal Data, and against loss, destruction, or damage to employee Personal Data. Pierre Fabre uses physical, logical, and technical measures, as well as organizational and procedural controls to safeguard your Personal Data, all of which are subject to regular review.

5.

Is your Personal Data transferred?

Your Personal Data (as described in section 2 above) may be transferred to organizations within the Pierre Fabre Group (subsidiaries), and to external service providers located outside the European Union. These transfers are carried out when necessary for the purposes set out in section 1 above. The processing activities carried include: organization, reading, inputting, adaptation or modification, extraction, use, communication, deletion and destruction of your Personal Data.

Given the fact that some of these countries do not ensure an adequate level of protection as in the European Union, Pierre Fabre, ensures, in accordance with applicable regulations, the protection of your Personal Data as follows:

- within Group Pierre Fabre, through the conclusion of an Intra-Group Transfer Agreement including standard contractual clauses published by the European Commission as they may be revised from time to time; and
- with its external service providers, through the implementation of standard contractual clauses published by the European Commission, as they may be revised from time to time.

Copies of these documents may be obtained by sending an email to the following address: UK_privacy@pierre-fabre.com

6.

How long do we store your Personal Data?

Pierre Fabre stores your Personal Data no longer than is necessary to carry out the purposes described in this Notice.

Pierre Fabre stores your Personal Data used for the management of your employment with Pierre Fabre for the entire duration of our contractual relation with you, except for certain Personal data which are subject to specific data retention term by the applicable laws.

The term of the data retention is thus different depending on the purposes set out in section 1 and subject to the data retention term imposed by applicable laws or defined to achieve the purpose sought. Also, we may need that your Personal Data be retained even at the end of your employment contract for a reasonable period of time for archival purposes, when we are required to do so to comply with our legal, tax, social and regulatory obligations, or where such data is necessary to establish the existence of a right or a contract.

In that case, your Personal Data will be archived and retained for the duration imposed by applicable law, or for the duration of the applicable statute of limitations.

After this period, your Personal Data will be anonymized or deleted from all systems.

You have a number of rights in relation to your Personal Data. More information about each of these rights is set out below:

Withdrawal of consent. You can withdraw at any time your consent in respect of any processing of Personal Data based on your consent, if applicable, without affecting the lawfulness of processing based on your consent before its withdrawal.

Access. You can ask us to confirm whether we process your Personal Data and, as the case may be, inform you of the characteristics of such processing, allow you to access such data and give you a copy of it.

Rectification. You can ask us to rectify or complete inaccurate or incomplete Personal Data.

Erasure. You can ask us to erase your Personal Data in the following cases: where it is no longer necessary for the purposes for which it was collected; you withdrew your consent; you objected to the processing of your Personal Data; your Personal Data has been processed unlawfully; or to comply with a legal obligation. We are not required to comply with your request notably if the processing of your Personal Data is necessary for compliance with a legal obligation or for the establishment, exercise or defence of legal claims.

Restriction. You can ask us to restrict the processing of your Personal Data (i.e., keep but not use your Personal Data) where: the accuracy of your Personal Data is contested; the processing is unlawful, but you do not want it erased; it is still necessary to establish, exercise or defend legal claims; to verify the existence overriding grounds following the exercise of your right of objection. We can continue to use your Personal Data following a request for restriction, where: we have your consent; to establish, exercise or defend legal claims; or to protect the rights of another natural or legal person.

Portability. You can ask us to provide your Personal Data to you in a structured, commonly used, machine-readable format, or you can ask to have it 'ported' directly to another data controller, but only where the processing is based on your consent or on the performance of a contract with you, and the processing is carried out by automated means.

Digital legacy. You have the right to define (general or specific) directives regarding the fate of your Personal Data after your death.

Right to object to processing justified on legitimate interest grounds. Where we are relying upon legitimate interest to process Personal Data, then you have the right to object to that processing. If you object, we must stop that processing unless we can either demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms or where we need to process the data for the establishment, exercise or defence of legal claims.

You also have the right to lodge a complaint with your Supervisory Authority. They can be reached via this link <https://ico.org.uk/global/contact-us/>

We have a Data Protection Officer ("DPO") who ensures that the Pierre Fabre complies with applicable data protection laws. You may contact Pierre Fabre's Data Protection Officer securely and confidentially at any time if you have any concerns about the processing of your Personal Data or any data protection issue by emailing UK_privacy@pierre-fabre.com

8. How will you know if there are any changes to this notice?

This Notice is posted on Pierre Fabre's intranet. You are invited to consult it regularly as it may be updated periodically to take account of changes in the law, regulations, or company practices. Employees will be notified when this occurs and when updated versions of this Notice will be issued.

9. Who do you contact if you have any privacy questions?

If you have any questions, about this Notice please contact the following email address: UK_privacy@pierre-fabre.com TEL: 0191 303 6336 Mob: 07758 330 145