

Neogen Europe - Privacy Notice for Employees

This notice explains what personal data (information) we hold about you, how we collect it, and how we use and may share information about you during your employment and after it ends. We are required to notify you of this information under data protection legislation.

Please ensure that you read this notice and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

Who collects the information

Neogen Europe Limited (the "**Company**") is a "data controller" and gathers and uses certain information about you. This information is also used by our affiliated entities and group companies, namely our parent company; Neogen Corporation and our subsidiary companies; Quat Chem and LAB M (our "group companies") and so, in this notice, references to "we" or "us" mean the Company and our group companies.

Data protection principles

We will comply with the data protection principles when gathering and using personal information, as set out in our [GDPR Data Protection Policy \(Employment\)](#).

About the information we collect and hold

The table set out in the Schedule summarises the information we collect and hold, how and why we do so, how we use it and with whom it may be shared.

We may also need to share some of the categories of personal information set out in the Schedule with other parties, such as external contractors and our professional advisers and potential purchasers of some or all of our business or on a restructuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations. We may also be required to share some personal information as required to comply with the law.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

Where information may be held

Information may be held at our offices and those of our group companies, and third party agencies, service providers, representatives and agents as described above. Information may be accessed from/transferred internationally to the USA and other countries around the world, including countries that do not have data protection laws equivalent to those in the UK, for the reasons described above.

Whenever we transfer your personal data outside of the European Economic Area (**EEA**) (including when we allow your personal data to be accessed from other countries), we seek to ensure that a similar degree of protection is afforded to your personal data by ensuring that appropriate safeguards are implemented or by ensuring that an applicable derogation from the restrictions under the data protection legislation applies, including any of the following:

- We will only transfer your personal data to organisations in countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. Currently this includes Andorra, Argentina, Canada (commercial organisations only), Faroe Islands, Guernsey, Israel, Isle of Man, Jersey, New Zealand, Switzerland and Uruguay. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).
- Where we use certain service providers and within our group companies, we may use specific contracts approved by the European Commission which give personal data the

same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).

- Where we use providers based in the USA (such as Microsoft) and within our group companies, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the European Union and the USA. For further details, see [European Commission: EU-US Privacy Shield](#).
- We may transfer your personal data outside of the EEA where this is necessary for the purposes of performing a contract between us and you (including your employment contract).
- We may transfer your personal data outside of the EEA where the transfer is necessary for the establishment, exercise or defence of legal claims.

We have security measures in place to seek to ensure that there is appropriate security for information we hold including those measures detailed in which can be found in our GDPR Data Protection Policy (Employment) in the Employee Handbook.

The following third parties may have access to your personal information and, in some circumstances, your special category data (if applicable), for the purposes noted below:

- our IT support provider, Lighthouse, for the purposes of enabling them to provide us with IT support
- our waste management company, William Tracey, who deal with bulk document shredding and waste disposal requirements
- Snowdrop KCS which provides payroll and HR software support
- Our auditors, BDO

How long we keep your information

We keep your information during and after your employment for no longer than is necessary for the purposes for which the personal information is processed. Further details on this are available in our [Employment Data Retention Policy](#).

Your rights to correct and access your information and to ask for it to be erased

Please contact our Data Protection Officer (DPO) the Divisional Manager- Accounts, Administration and Shipping, who can be contacted by writing to The Dairy School, Auchincruive, Ayr, KA6 5HU, or by telephone - 01292 525 600 if (in accordance with applicable law) you would like to correct or request access to information that we hold relating to you or if you have any questions about this notice. You also have the right to ask our Data Protection Officer for some but not all of the information we hold and process to be erased (the "right to be forgotten") in certain circumstances. Our Data Protection Officer will provide you with further information about the right to be forgotten, if you ask for it.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

How to complain

If you have any queries or concerns about this notice or about our use of your personal information, please contact our Data Protection Officer.

If our Data Protection Officer is not able to address your query or concern, you can contact the Information Commissioner at <https://ico.org.uk/concerns/> or by telephone on 0303 123 1113 for further information about your rights and how to make a formal complaint.

The Schedule

About the information we collect and hold

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Your name, contact details (i.e. address, home and mobile phone numbers, email address) and emergency contacts (i.e. name, relationship and home and mobile phone numbers) <input type="checkbox"/>	From you	To enter into/performance the employment contract Legitimate interest: to maintain employment records and good employment practice	To enter into/performance the employment contract
Details of salary and benefits, bank/building society, National Insurance and tax information, your age <input type="checkbox"/>	From you	To perform the employment contract including payment of salary and benefits Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice	To ensure you receive the correct pay and benefits Information shared with our payroll department, life insurance provider (Metlife), and with HM Revenue & Customs (HMRC)
Details of your spouse/partner and any dependants <input type="checkbox"/>	From you	To perform the employment contract including employment-related benefits, e.g. life assurance and pension	To ensure you receive the correct pay and benefits Information shared with our payroll department, life insurance provider (Metlife), and with HM Revenue & Customs (HMRC)
Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information <input type="checkbox"/>	From you and, where necessary, the Home Office	To enter into/performance the employment contract To comply with our legal obligations Legitimate interest: to maintain employment records	To carry out right to work checks Information may be shared with the Home Office
A copy of your driving licence <input type="checkbox"/>	From you	To perform the employment contract To comply with our legal obligations	To ensure that you have a clean driving licence

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
		To comply with the terms of our insurance	Information may be shared with our insurer
Details of your share incentive arrangements, and all information included in these and necessary to implement and administer them <input type="checkbox"/>	From you, our share scheme administrators American Stock Transfer (AST) and your personnel records	To perform the share incentive contract Legitimate interests: to comply with tax, legal, regulatory and corporate governance obligations and good employment practice, to carry out obligations under employment law, for the establishment, exercise or defence of legal claims, to incentivise staff	To administer your share scheme benefits Information shared with our share scheme administrators American Stock Transfer (AST), with HMRC and with any third party granting or satisfying the share incentive arrangements
Details of your pension arrangements, and all information included in these and necessary to implement and administer them <input type="checkbox"/>	From you, from our pension administrators Standard Life and Scottish Widows and (where necessary) from your own pension fund administrators	To perform the employment contract including employment-related benefits To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice	To administer your pension benefits and to comply with our auto-enrolment pension obligations Information shared with our pension administrators Standard Life and Scottish Widows and with HMRC
Information in your sickness and absence records (including sensitive personal information regarding your physical and/or mental health) <input type="checkbox"/>	From you, from your doctors, from medical and occupational health professionals we engage.	To perform the employment contract including employment-related benefits To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good	To maintain employment records, to administer sick pay entitlement, to follow our policies and to facilitate employment-related health and sickness benefits To comply with our legal obligations to you as your employer Information shared with your doctors,

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
		employment practice, to ensure safe working practices	with medical and occupational health professionals we engage. For further information, see * below
Information on grievances raised by or involving you	From you, from other employees and from consultants we may engage in relation to the grievance procedure	To perform the employment contract To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice	For staff administration, to follow our policies and to deal with grievance matters Information shared with relevant managers, HR personnel and with consultants we may engage
Information on conduct issues involving you	From you, from other employees and from consultants we may engage in relation to the conduct procedure	To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice, to ensure safe working practices	For staff administration and assessments, to follow our policies, to monitor staff performance and conduct and to deal with disciplinary and grievance matters Information shared with relevant managers, HR personnel and with consultants we may engage
Details of your performance management/improvement plans	From you, from other employees and from consultants we may engage in relation to the performance review process	To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice, to ensure	For staff administration and assessments, to follow our policies and to monitor staff performance Information shared with relevant managers, HR personnel and with consultants we may engage

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
		safe working practices	
Details of your time and attendance records	From you and from door entry systems, swipe card systems, and time clock records	To perform the employment contract Legitimate interest: to monitor and manage staff access to our systems and facilities and to record staff absences	For payroll and staff administration and assessments, to follow our policies and to monitor staff performance and attendance Information shared with relevant managers, HR personnel and with our payroll department
Information regarding your work output	CRM	To perform the employment contract Legitimate interests: to maintain employment records	For staff administration and assessments, to follow our policies and to monitor staff performance and attendance Information shared with relevant managers, HR personnel and with consultants we may engage
Information in applications you make for other positions within our organisation	From you	To enter into/perform the employment contract To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice	To process the application Information shared with relevant managers, HR personnel and with consultants we may engage
Information about your use of our IT, communication and other systems	Automated monitoring of our websites and other technical systems, such as our computer networks	Legitimate interests: to monitor and manage staff access	To protect and carry out our legitimate interests (see adjacent column)

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
	<p>and connections, CCTV and access control systems, communications systems, remote access systems, email and instant messaging systems, and Internet facilities, telephones, voicemail, mobile phone records, spam filter, Intrusion Detection System (IDS), Intrusion Protection System (IPS), Antivirus (Bitdefender)</p>	<p>to our systems and facilities;</p> <p>to protect our networks, and personal data of employees and customers/clients, against unauthorised access or data leakage;</p> <p>to ensure our business policies, such as those concerning security and internet use, are adhered to for operational reasons, such as maintaining employment records, recording transactions, training and quality control;</p> <p>to ensure that commercially sensitive information is kept confidential;</p> <p>to check that restrictions on your activities that apply after your employment has ended (post-termination restrictions or restrictive covenants) are being complied with, for investigating complaints and allegations of criminal offences, for statistical analysis, to prevent unauthorised access and modifications to our systems as part of investigations by regulatory bodies, or in connection with legal proceedings or requests</p>	<p>Information shared with relevant managers, HR personnel and with consultants we may engage</p> <p>For further information, see ** (below)</p>

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
<p>Details of your use of business-related social media, such as LinkedIn</p>	<p>From relevant websites and applications</p>	<p>Legitimate interests:</p> <ul style="list-style-type: none"> to monitor and manage staff access to our systems and facilities; to protect our networks, and personal data of employees and customers/clients, against unauthorised access or data leakage; to ensure our business policies, such as those concerning security and internet use, are adhered to; for operational reasons, such as maintaining employment records, recording transactions, training and quality control; to ensure that commercially sensitive information is kept confidential; to check that restrictions on your activities that apply after your employment has ended (post-termination restrictions or restrictive covenants) are being complied with; as part of investigations by regulatory bodies, or in connection with legal proceedings or requests 	<p>To protect and carry out our legitimate interests (see adjacent column)</p> <p>Information shared with relevant managers, HR personnel and with consultants we may engage</p> <p>For further information, see ** below</p>

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
<p>Your use of public social media (only in very limited circumstances, to check specific risks for specific functions within our organisation; you will be notified separately if this is to occur)</p>	<p>From relevant websites and applications</p>	<p>Legitimate interests:</p> <ul style="list-style-type: none"> to monitor and manage staff access to our systems and facilities; to protect our networks, and personal data of employees and customers/clients, against unauthorised access or data leakage; to ensure our business policies, such as those concerning security and internet use, are adhered to; for operational reasons, such as maintaining employment records, recording transactions, training and quality control; to ensure that commercially sensitive information is kept confidential to check that restrictions on your activities that apply after your employment has ended (post-termination restrictions or restrictive covenants) are being complied with; as part of investigations by regulatory bodies, or in connection with legal proceedings or requests 	<p>To protect and carry out our legitimate interests (see adjacent column)</p> <p>Information shared with relevant managers, HR personnel and with consultants we may engage</p> <p>For further information, see ** below</p>

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Details in references about you that we give to others	From your personnel records, our other employees	To perform the employment contract To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice	To provide you with the relevant reference To comply with legal/regulatory obligations Information shared with relevant managers, HR personnel and the recipient(s) of the reference

You are required (by law or under the terms of your contract of employment, or in order to enter into your contract of employment) to provide the categories of information marked '☐' above to us to enable us to verify your right to work and suitability for the position, to pay you, to provide you with your contractual benefits, such as contractual sick pay, life insurance, pension and to administer statutory payments such as statutory sick pay (SSP). If you do not provide this information, we may not be able to employ you, to make these payments or provide these benefits.

* Further details on how we handle sensitive personal information are set out in our GDPR Data Protection Policy (Employment) available on Self Service or from the HR department.

** Further information on the monitoring we undertake in the workplace and how we do this is available in our IT, Internet and Email Policy (including Social Media Policy) which can be found within the Employee Handbook or requested from the HR department