

## Carlsberg Non-Employee Worker Privacy Notice

We, **Carlsberg UK Limited and Carlsberg Supply of Chain UK Limited ("Carlsberg")**, have prepared this Non-Employee Worker Privacy Notice ("**Notice**") for individuals, like you, that provide services to Carlsberg either directly or indirectly. The purpose of this Notice is to give you information on how Carlsberg collects, processes, stores and otherwise uses information about you, and on your rights in relation to that information.

Carlsberg needs to process your personal data in order to engage you to provide services to us and to continue to perform crucial aspects of the contract under which you provide those services, such as facilitating payment to you, your personal services company, or your employer or other intermediary (as appropriate).

In this document, "**Carlsberg**", "**we**" or "**us**" refers to the Carlsberg entity that you provide services to. In addition, you will see a number of references to the "**Carlsberg Group**", which includes all other Carlsberg entities globally. For a full list of the Carlsberg Group entities, please contact us as advised below.

Carlsberg may update this document from time to time, for example if we implement new systems or processes that involve the use of personal data.

"**GDPR**" is the General Data Protection Regulation which is a European law governing your rights in relation to your personal data and how organisations must protect it.

### What types of personal data does Carlsberg collect?

"**Personal data**" means any information relating to you. Carlsberg will collect, process and use the following types of personal data (together understood as "**non-employee worker data**") about you:

- **Identification data**, such as your name, signature, business email address, business address, business landline, nationality, passport details, driving licence details and vehicle registration details;
- **Personal information**, such as your date of birth, gender and native language;
- **Sexual orientation information**, such as your marital status and information in your marriage / civil partnership certificate;
- **Health and medical information**, such as information about any accidents you have on our sites or a disability that you have;
- **Contact details**, such as your home address, telephone number and email address;
- **Information about the services you provide and how you are paid for them**, such as the start and end date of the contract under which you provide services to us, the number of hours that you provide services for, education history and qualifications, information about the pay you receive, such as your hourly rate of pay, tax reference for invoicing, your/your personal services company's bank account details and payment dates, and accrued pay information;
- **Time and systems and buildings access monitoring information**, such as video, photos, swipe card access, time recording software, and internet, email and telephone usage data;
- **Performance information**, such as service provision reviews and the handling of any complaints in relation to the services you provide;
- **Background check information**, such as information obtained via any criminal record checks and third party screening procedures;
- **Absence information**, such as dates of leave of absence/vacation and medical leave; and
- **Organisational data**, including IDs for IT systems, company details, cost centre allocations and organisations.

Under the GDPR, certain categories of non-employee worker data are considered particularly sensitive ("**sensitive non-employee worker data**") and, therefore, as needing additional protection. These categories include information about health, racial or ethnic origin, political opinions, religious beliefs, trade union membership or your sexual orientation, and genetic and biometric data. Information concerning criminal convictions and offences is also viewed as sensitive under applicable data protection laws.

We handle non-employee worker data and sensitive non-employee worker data in compliance with applicable data protection laws, including as described in the “How does Carlsberg use my data?” section below.

### **How does Carlsberg use my data?**

We collect and use this non-employee worker data and sensitive non-employee worker data for a variety of reasons linked to the services you provide to us (“**processing purposes**”). The exact reasons that we collect and use the non-employee worker data and sensitive non-employee worker data will differ depending on how you are engaged to provide services to us. We have listed below a list of reasons with examples of relevant data:

- **Administering and providing pay for services**, including details of any change of name, which may involve the processing of contact details, information about the services you provide, your rate of pay and the number of hours you have worked, details of your bank account/your personal service company's or other intermediary's bank account, and sexual orientation data;

*Legal bases: contract performance, fraud prevention*

- **Administering our workforce and the services you provide**, including monitoring internet, email and telephone usage, conducting reviews of the services provided and handling any complaints in relation to them, providing references as requested, accommodating the work place for any disabilities you might have, managing work place safety and work place accidents, and administering ethics and compliance training, which may involve the processing of identification data, contact details, information about the services you provide, your hourly rate of pay, absence information, health and medical information, and organisational data;

*Legal bases: contract performance, legal obligations, legitimate interests (to manage relations with our service providers, including performance issues, to enable us to effectively manage the output of our service providers, employment rights and obligations)*

- **Providing IT systems and support**, to enable you and others to perform their work, to enable our business to operate, to enable us to identify and resolve issues in our IT systems and to keep our systems secure, which may involve processing almost all types of non-employee worker data;

*Legal bases: contract performance, legitimate interests (to manage our business operations and to enable us to ensure the security of our systems)*

- **Complying with applicable laws**, as well as the administration of those requirements, including tax laws and health & safety, which may involve the processing of identification data and background check information;

*Legal bases: contract performance, legal obligations, to prevent fraud and unlawful acts such as money laundering*

- **Monitoring and ensuring compliance with applicable policies, procedures and laws**, including conducting internal investigations and operating a CCTV system, which may involve the processing of identification data, contact details, information about the services you provide, your rate of pay and background check information;

*Legal bases: legitimate interests (managing compliance with our policies), to prevent fraud and unlawful acts*

- **Communicating with you, other Carlsberg employees and third parties**, (e.g. business partners, suppliers, customers or government officials), which may involve the processing of identification data, contact details, information about the services you provide and organisational data;

*Legal bases: contract performance, legitimate interests (managing our business operations and to enable us to cooperate with regulatory authorities)*

- **Responding to and complying with requests and legal demands from regulators or other authorities**, within or outside your home country, which may involve the processing of identification data, contact details, information about the services you provide, your rate of pay and organisational data;

*Legal bases: legal obligations, legitimate interests (to enable us to cooperate with regulatory authorities), legal claims*

- **Fulfilling corporate financial responsibilities and changing our business structure**, including audit requirements and cost/budgeting analysis and control, which may involve the processing of identification data, contact details, information about the services you provide, your rate of pay, and organisational data.

*Legal bases: contract performance, legal obligations, legitimate interests (to enable us to cooperate with regulatory authorities and to allow us to change our business)*

If you have any questions about the legal bases on which we rely, please contact us using the contact details set out below.

### **Who does Carlsberg share my data with?**

To ensure that the processing purposes can be achieved, your information may be shared with any of the entities within the Carlsberg network. Where we share data in this way, it is our policy to limit the categories of individual who have access to that personal information.

Carlsberg may transfer personal data to third parties, including entities within and outside the Carlsberg Group in any jurisdictions where the Carlsberg Group entities are located, for the following processing purposes:

- **Within the Carlsberg Group.** As the Carlsberg entity that you provide services to is part of a wider group with headquarters in Denmark, and entities located across several regions, Carlsberg may transfer the non-employee worker data and sensitive non-employee worker data to, or otherwise allow access to such data by, other entities within the Carlsberg Group and the Directors of the Carlsberg Group, which may use, transfer and process the data for the following purposes: to maintain and improve effective administration of the workforce; to communicate information about the Carlsberg Group; to monitor and assure compliance with applicable policies and procedures, and applicable laws; and to respond to requests and legal demands from regulators and other authorities.
- **Communication with third parties.** As necessary in connection with business operations, work contact details and communication contact details may be transferred to existing or potential business partners, suppliers, customers, end-customers, government officials and other third parties.
- **Regulators, authorities, and other third parties.** Where necessary for the processing purposes described above, personal information may be transferred to regulators, courts and other authorities (e.g. tax and law-enforcement authorities), independent external advisors (e.g. auditors), Carlsberg insurance providers, pensions and benefits providers, and internal compliance and investigation teams (including external advisers appointed to conduct internal investigations).
- **Data processors.** Where necessary for the processing purposes described above, personal data may be shared with one or more third parties, whether affiliated or unaffiliated, to process personal information under appropriate instructions ("**data processors**"). Data processors may carry out instructions related to workforce administration, IT system support and maintenance, payroll and compensation, training, compliance, and other activities, and will be subject to contractual obligations to implement appropriate technical and organisational security measures to safeguard the personal information, and to process the personal information only as instructed.

For a full list of the Carlsberg Group entities and third parties with whom we may share your data, please contact us as advised below.

Some of the recipients with whom we may share non-employee worker data and sensitive non-employee worker data may be located in countries outside Europe. In some cases, this may include countries located outside the European Union and/or European Economic Area ("EEA").

Some countries where recipients are located already provide an adequate level of protection for this data, while transfers to other countries such as the USA may be protected under arrangements such as the EU-US Privacy Shield. Nevertheless, in the case of transfers to Carlsberg entities outside the EEA, Carlsberg will be bound by the EU Standard Data Protection Clauses (pursuant to Article 46(2)(c) GDPR), which the European Commission has assessed as providing an adequate level of protection for personal data, to ensure that your data is protected adequately.

If recipients are located in other countries without adequate protections for personal data, Carlsberg will take all necessary measures to ensure that transfers out of the EEA are adequately protected as required by applicable data protection law. This will include using appropriate safeguards such as the EU Standard Data Protection Clauses. You can ask for a copy of the appropriate safeguards by contacting us as set out below.

#### **How long will Carlsberg keep personal information?**

It is our policy not to keep personal information for longer than is necessary. Where personal information is kept, the period will be determined based on applicable local law. For further information, please contact us as advised below.

#### **What rights do I have in respect of my personal information?**

You have a number of rights in relation to your non-employee worker data and sensitive non-employee worker data. These can differ by country, but can be summarised in broad terms as follows:

##### **Right of access**

You have the right to confirm with us whether your personal data is processed, and, if it is, to request access to that personal data and to be informed of the types of personal data processed, the purpose of the processing and the recipients or categories of recipients. However, we do have to take into account the interests of others, so this is not an absolute right.

##### **Right to rectification**

You may have the right to rectify inaccurate or incomplete personal data concerning you.

##### **Right to erasure (right to be forgotten)**

You may have the right to ask us to erase personal data concerning you.

##### **Right to restriction of processing**

In certain circumstances, you may have the right to request that we restrict processing of your personal data.

##### **Right to data portability**

You may have the right to receive, in a structured and machine-readable format, personal data concerning you that you have provided to us, and you may have the right to transmit that data to another entity.

##### **Right to object and rights relating to automated decision-making**

In certain circumstances, you may have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data, including profiling, by us and we may be required to no longer process your personal data.

**Who can I contact?**

If you have any concerns or questions about this Notice, you can get hold of the right person here:

Legal Department, Carlsberg UK Limited / Carlsberg Supply Company UK Limited, 140 Bridge Street, Northampton, NN1 1PZ or by email to [uk.hr.admin@carlsberg.co.uk](mailto:uk.hr.admin@carlsberg.co.uk).

You also have the right to lodge a complaint with the competent data protection supervisory authority, which in the United Kingdom is the Information Commissioner's Office.