



# NGK BERYLCO (U.K.) LTD.

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## DATA PRIVACY NOTICE FOR EMPLOYEES

Last updated on 21<sup>st</sup> July 2021

Our organisation, NGK Berylco UK Ltd. is committed to protecting privacy regarding our current/former employees and job applicants, and their family members in compliance with **the UK Data Protection Act 2018** which is the UK's implementation of the General Data Protection Regulation (GDPR).

This notice gives you information regarding how we process your personal data.

### 1. Data Controller of Personal Data

The following is responsible for the processing of your personal data as data controller.

NGK Berylco UK Ltd  
Houston Park  
Montford Street  
Salford, United Kingdom  
M50 2RP

### 2. Contact Point and Our Data Protection Officer

We have set up a contact point that will handle any questions or requests you may have concerning this notice, your personal data, and its processing.

For any inquiries, requests or complaints concerning the application of this notice or for exercising your rights, as described in this notice, you can reach our contact point below:

Contact point:  
Damon Kemp  
Accounts Department  
NGK Berylco UK Ltd  
Houston Park  
Montford Street  
Salford, United Kingdom  
M50 2RP

You can also contact our data protection officer at [dpo@ngk.co.jp](mailto:dpo@ngk.co.jp) with questions or concerns about how we process your personal data.

### 3. Collection of Information

We collect and process your:

- personal identification data, contact data, such as name, email address, home address, phone number, date and place of birth, identity card, passport, marital status, gender, work-related/company event-related\* photographs and videos, social security number;
- bank account details, employment related income and benefits data, family and dependent data;
- details of qualifications, diplomas, skills, experience and employment history, including start and end dates, with previous and current employers;
- details of schedule (days of work and working hours) and attendance at work;
- details of periods of leave taken, including holiday, sickness absence, family leave and any reasons given for the leave;
- department, assessments of performance, including appraisals, performance reviews and ratings, training, performance improvement plans and related correspondence.
- "technical information" such as IP address, browser type, operating system, system language used, access times and referring website address.

\*An image of your family members as well as yours may be captured by visual recording devices at our company events.

### 4. Legal Basis and Purposes for Processing Personal Data

We will use your personal information;

1) For the performance of our labour relationship, in order to:

- determine the terms on which you work for us;
- manage employment contract;
- calculate payroll and compensation;
- deduct tax, mandatory social contributions and national insurance contributions in accordance with local legislation;
- provide benefits or complementary benefits awarded to you according to company policy;
- enroll you in a pension arrangement in accordance with statutory automatic enrolment duties;
- liaise with your pension provider and any other provider of employee benefits.

2) For the performance of legal obligations, in order to:

- check if you are legally entitled to work in the country where we operate;
- keep a record of attendance, vacation, absence and sick leave;
- arrange the termination of our working relationship -performing administration of relevant documents, reporting to relevant authorities if required by local legislation;
- manage travel expenses, reports and payments;
- arrange visa invitations and/or visas;
- perform working health & safety management – in case of work accidents, investigation and reporting to relevant authorities;
- arrange health examinations if applicable and comply with other health and safety obligations coming from local legislation;
- the operation of the compliance management system of NGK Group, including the operation of whistleblowing systems and email monitoring; and
- deal with legal disputes involving our employees.

3) For the pursuance of our legitimate interests, in order to:

- carry out our daily operations and project management;
- carry out our contractual obligations with customers, subcontractors, vendors and suppliers;
- perform working health and safety management;
- determine performance requirements;
- set individual targets and conduct regular performance reviews and assessments;
- manage performance records;
- take minutes of meeting;
- carry out employees' training development activities;
- arrange a business trip;
- monitor use of our systems and other assets to ensure security and compliance with our policies;
- gather evidence and any other steps relating to possible grievance or disciplinary matters and associated hearings;
- conduct internal audit of the functions and activities of the company
- respond external audits by a third-party; and
- publish internal/external newsletters and static image/video advertisement.

Please note that the above-mentioned purposes are not exhaustive.

As mentioned above, we may ask you to provide your personal data to comply with a legal requirement or to perform a contract with you. In such cases, we will make this clear at the relevant time and advise you whether the provision of your personal data is mandatory or not, as well as of the possible consequences if you do not provide your personal data.

In some cases, we will process your personal data when you have freely given your consent, which is one of our legal basis of processing.

## **5. Sharing and Disclosure of Personal Data**

Your personal data is intended for authorised persons of our company, in particular persons in charge of personnel management, payroll, security and information technology, and your line manager.

NGK Group employees who are authorised and have been specifically instructed in compliance with data privacy protection requirements, may also receive, process or use your personal data in the normal course of NGK Group business activities.

Your personal data may be provided to our customers, subcontractors, vendors or suppliers. We have imposed them to deal with your personal data in compliance with the applicable law and to protect your personal data, by contractual means.

When we transfer your personal data outside the UK, we use specific contracts that are approved by the ICO for the transfer. These contracts ensure the same levels of personal data protection that would apply under the Data Protection Act 2018.

## 6. Retention Period

We will not keep your personal data for any purpose for longer than is necessary to fulfil the purpose we first collect it for.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

After such retention period, we will delete or anonymize your personal data so that you cannot be individually identified. We will assure to make it happen. You reserve the right to ask us for when and how it has been done.

## 7. Your Rights

1) ***The right to be informed***

You have the right to be informed about the collection and use of your personal data. This policy should tell you everything you need to know, but you can always contact us to find out more.

2) ***The right to access your personal data***

You have the right to access your personal data that NGK Group holds.

3) ***The right to correct your Personal Data***

You have the right to have your personal data rectified if any of your personal data held by the NGK Group is inaccurate or incomplete.

4) ***The right to be forgotten***

You have the right to delete or otherwise dispose of any of your personal data that the NGK Group has.

5) ***The right to restrict processing***

You have the right to block or prevent the processing of your Personal Data.

6) ***The right to object***

You have the right to ask us not to use your personal data for a particular purpose.

7) ***The right to withdraw consent***

You have the right to withdraw your consent at any time if the NGK Group is relying on your consent as the legal basis for using your personal data.

8) ***The right to data portability***

You have the right to have your personal data transferred to another person if you want to move or transfer your personal data to a different service provider or copy your personal data for your own purposes.

9) ***Rights relating to automated decision-making and profiling***

We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please address to our contact details in section 2 of this document.

You have also the right to lodge a complaint with the local data protection authority – in England, this is Information Commissioner's Office, at <https://ico.org.uk>

## 8. Security

We process your personal data in a manner that ensures such data undergoes appropriate security (including protection against unauthorised or unlawful processing and against accidental loss, destruction damage, etc.) using appropriate technical or organisational measures.

## 9. Changes to this Notice

We reserve the right to change this notice at any time. Where appropriate, we shall notify data users of this notice of those changes by email or through an announcement posted on the company's website.

Justin Dodds (General Manager)  
NGK Berylco UK Ltd.