

DATA PROTECTION PRIVACY NOTICE FOR ALUMNI OF SETL LIMITED AND SETL DEVELOPMENT LIMITED AND ITS CORPORATE GROUP

Data protection privacy notice (Alumni)

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 after your employment¹ ends. We are required to notify you of this information under data protection legislation. Please ensure that you read this notice (sometimes referred to as a 'privacy 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

Your former employer is one of the following companies:

SETL Development Limited;

SETL France; or

SETL Limited

Your former employer is a 'data controller' and gathers and uses certain information about you. This information, or part of it, may also be used by the other group companies named above. In this notice, references to 'we' or 'us' mean your employer and its group companies.

Data protection principles

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

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 re-structuring. 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 in the Schedule.

How long we keep your information

We keep your information for no longer than is necessary for the purposes for which the personal information is processed. Further details on this are available in our Data Retention Guidelines, available from our [Legal department](#).

¹ 'Employment' in this document includes tenure as a consultant

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

Please contact our [Legal department](#) 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 [Legal department](#) for some but not all of the information we hold and process to be erased (the 'right to be forgotten') in certain circumstances. Our [Legal department](#) 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

We hope that our [Legal department](#) can resolve any query or concern you raise about our use of your information. If not, contact the Information Commissioner at ico.org.uk/concerns/ or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

The Schedule

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Information in references about you including name and your employment details with us that we shall provide to other	From personnel records and our other employees	<p>To perform the leaving agreement & obligations</p> <p>To comply with our legal obligations</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice</p>	<p>To provide you with the relevant reference</p> <p>To comply with legal/regulatory obligations</p> <p>Information shared with relevant managers, HR personnel and the recipient(s) of the reference</p>
Details of your salary and benefits arrangements, and all information relating to this and necessary to implement and administer payroll	From, for former employees in the UK, our payroll administrators Watson Palmer Limited ² and, for former employees in France, our payroll administrators Fidelio ³ and (where necessary) the HM Revenue & Customs (HMRC) or the Unions de Recouvrement des Cotisations de Sécurité Sociale et d'Allocations Familiales (URSSAF)	<p>To comply with our legal obligations</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice</p>	<p>To comply with legal/regulatory obligations</p> <p>Information shared, for former employees in the UK, with our payroll administrators Watson Palmer Limited and with the HMRC and, for former employees in France, with our payroll administrators Fidelio and URSSAF.</p>
Details of your pension arrangements, and all information relating to this and necessary to implement and administer them	From our pension scheme provider Royal London ⁴	<p>To comply with our legal obligations</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice</p>	<p>To administer your pension benefits and to comply with our auto-enrolment pension obligations</p> <p>Information shared with our pension administrators Lark Employee</p>

² Watson Palmer Limited, registered in England and Wales number 07544717. Registered office: 6 Howlett Close, Kesgrave, Ipswich, Suffolk, IP5 2EJ.

³Fidelio, part of the Crowe Horwath International Network, registered office: Expert Comptable et Conseil, 15 rue de la Baume, 75008 Paris.

⁴ The Royal London Mutual Insurance Society Limited is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. The firm is on the Financial Services Register, registration number 117672. Registered in England and Wales number 99064. Registered office: 55 Gracechurch Street, London, EC3V 0RL.

<p>Details of your use of business-related social media, such as LinkedIn</p>	<p>From relevant websites and Legitimate interests:</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</p> <p>as part of investigations by regulatory bodies, or in connection with legal proceedings or requests</p>	<p>Benefits Limited⁵, pension scheme provider Royal London and with HMRC</p> <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>
<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 Legitimate interests:</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</p> <p>as part of investigations by regulatory bodies, or in connection with legal proceedings or requests</p>	<p>To protect and carry out our legitimate interests (see adjacent column)</p> <p>Information shared with relevant managers and HR personnel</p> <p>For further information, see * below</p>

* Further information on the monitoring we undertake on social media and how we do this is available in our Social Media Policy, which will soon be available on the Intranet, and which is, in the interim, available from our [Legal department](#).

⁵ Lark Employee Benefits Limited, Registered in England and Wales company number 02792080, Registered office: 8th Floor Ibex House, 42-47 Minories, London, EC3N 1DY