

Security Service (Malta) Limited

EMPLOYEES PRIVACY POLICY

The General Data Protection Legislation (GDPR) will come into effect as of 25th May 2018.

Security Service (Malta) Limited (herein after referred to as the '*Organisation*') has been working on updating policies, processes and cooperating as necessary to implement the appropriate organisational and technical structures and controls to ensure proper handling of your personal data in accordance with the GDPR.

Therefore, the Organisation has updated the 'Privacy Policy' in compliance with the terms of the GDPR.

This policy therefore contains the data protection provisions underlying the organisation's obligations towards its Employees under the new terms.

Introduction

At Security Service (Malta) Limited we are committed to maintaining the accuracy, confidentiality and security of your personal information. This Privacy Policy describes the personal information that Security Service (Malta) Limited collects from or about you, and how we use and to whom we disclose that information.

Application

This Privacy Policy applies to the personal information of all individuals who seek to be, are, or were employed by Security Service (Malta) Limited (collectively, an "employee"). No personal information, collected from queries through our website, shall be disclosed while using the Security Service (Malta) Limited website.

All references in this Privacy Policy to "Security Service (Malta) Limited", "we", "us", "our" and like terms should be interpreted accordingly.

Policy of Compliance

It is Security Service (Malta) Limited's policy to comply with the GDPR requirements. This Privacy Policy was developed to guide the activities of Security Service (Malta) Limited. In addition, specific privacy practices may be adopted to address the specific privacy requirements.

This Privacy Policy has a limited scope and application and the rights and obligations contained in this Privacy Policy are applicable to Security Service (Malta) Limited's employees, casual workers, flexi staff, agency workers as well as potentially consultants and other independent contractors. If you are unsure if or how this Privacy Policy applies to you, please contact the office for more information.

What is Personal Information?

For the purposes of this Privacy Policy, personal information is any information about an identifiable individual, other than the person's business title or business contact information when used or disclosed for the purpose of business communications. Personal information does not include anonymous or non-personal information (i.e., information that cannot be associated with or tracked back to a specific individual).

What Personal Information Do We Collect?

We collect and maintain different types of personal information in respect of those individuals who seek to be, are, or were employed by us, including the personal information contained in:

- Curriculum Vitae and/or applications;

- References and interview notes;
- Police Conduct;
- Private Guard Licence;
- Copy of Driving Licence & ID Card and for those foreigners EU & Non-EU "Residential Card" & "Work Permit"
- Photographs and videos (*when applicable*);
- Letters of offer and acceptance of employment;
- Mandatory policy acknowledgement sheets;
- Payroll information; including but not limited to social security number and bank account information intended to be used for the transfer of wages;
- wages and benefits information;
- forms relating to the application for, or in respect of changes to, employee health and welfare benefits; including, short and long term disability, medical and dental care;
- Beneficiary and emergency contact information.

In addition to the data listed above, personal information also includes information such as name, home address, telephone, personal email address, date of birth, employee identification number and marital status, and any other information necessary to Security Service (Malta) Limited's business purposes, which is voluntarily disclosed or legally required in the course of an employee's application for and during employment with Security Service (Malta) Limited.

As a general rule, Security Service (Malta) Limited collects personal information directly from employees. In most circumstances where the personal information about employees is held by a third party, we will obtain the consent of the employee before we seek out this information from such sources.

From time to time, we may utilise the services of third parties in our business and may also receive personal information collected by those third parties in the course of the performance of their services for us or otherwise. Where this is the case, we will take reasonable steps to ensure that such third parties have represented to us that they have the right to disclose your personal information to us.

We may also be requested by our Clients to forward your personal information to them for evaluation (such as curriculum vitae). In this case we shall also seek your

consent before providing such information unless such consent already exist through the contract of services between Security Service (Malta) Limited and the employee. Where permitted or required by applicable law or regulatory requirements, we may collect information about you without your knowledge or consent.

Why Do We Collect Personal Information?

The personal information collected is used and disclosed for our business purposes, including establishing, managing or terminating your employment relationship with Security Service (Malta) Limited. Such uses include:

- Determining eligibility for initial employment, including the verification of references and qualifications;
- Administering wages and benefits;
- Processing employee work-related claims (e.g. worker compensation, insurance claims, etc.)
- Establishing training and/or development requirements;
- Conducting performance reviews and determining performance requirements;
- Assessing qualifications for a particular job or task;
- Gathering evidence for disciplinary action, or termination;
- Establishing a contact point in the event of an emergency (such as next of kin);
- Complying with applicable labour or employment legislation and/or Union collective agreements;
- Compiling directories;
- Ensuring the security of company-held information;
- Such other purposes as are reasonably required by Security Service (Malta) Limited in order to fulfil its legal obligation under legislation.

Monitoring

The work output of Security Service (Malta) Limited's employees, whether in paper record, computer files, or in any other storage format belongs to us, and that work output, and the tools used to generate that work output, are always subject to review and monitoring by Security Service (Malta) Limited.

In the course of conducting our business, we may monitor employee activities on our premises and property. For example, some of our locations are equipped with surveillance cameras. These cameras are generally in high risk areas. Where in use, surveillance cameras are there for the protection of employees and third parties, and

to protect against theft, vandalism and damage to our Client's and/or Security Service (Malta) Limited's goods and property. Generally, recorded images are routinely destroyed in line with the GDPR provisions and not shared with third parties unless there is suspicion of a crime, in which case they may be turned over to the police or other appropriate authority.

We may also have the capability to monitor all employees' computer and e-mail usage and hence no office equipment may be used for personal activities such as sending personal e-mails and/or surfing on social media during hours of duty.

This section is not meant to suggest that all employees will in fact be monitored or their actions subject to constant surveillance. We have no duty to monitor. It is meant to bring to your attention the fact that such monitoring may occur and may result in the collection of personal information from employees (e.g. through their use of our resources). When using Security Service (Malta) Limited equipment or resources employees should not have any expectation of privacy with respect to their use of such equipment or resources.

How Do We Use Your Personal Information?

We may use your personal information:

- For the purposes described in this Privacy Policy;
- For any additional purposes that we advise you of and where your consent is required by law we would have obtained your consent in respect of the use or disclosure of your personal information.

We may use your personal information without your knowledge or consent where we are permitted or required by applicable law or regulatory requirements to do so.

When Do We Disclose Your Personal Information?

We may share your personal information with our employees, contractors, consultants and other who would require such information to assist us with establishing, managing or terminating our employment relationship with you, including: parties that provide products or services to us or on our behalf and parties that collaborate with us in the provision of products or services to you. In some instances, such parties may also provide certain information technology and data processing services to us so that we may operate our business. Personal information is only transferred by us to another country if this is required and in line with the

provisions laid down in the GDPR, in particular only in as far as a reasonable level of data protection is assured in the recipient country.

When we share personal information with such parties we typically require that they only use or disclose such personal information in a manner consistent with the use and disclosure provisions of this Privacy Policy and hence the provisions of the GDPR.

In addition, personal information may be disclosed or transferred to another party in the event of a change in ownership of, or a grant of a security interest in, all or a part of Security Service (Malta) Limited through, for example, an asset or share sale, or some other form of business combination, merger or joint venture, provided that such party is bound by appropriate agreements or obligations and required to use or disclose your personal information in a manner consistent with the use and disclosure provisions of this Privacy Policy and the GDPR, unless you consent otherwise.

Furthermore, your personal information may be disclosed:

- As permitted or required by applicable law or regulatory requirements. In such a case, we will endeavour to not disclose more personal information than is required under the circumstances;
- To comply with valid legal processes such as search warrants, summonses or court orders;
- To protect the rights and property of Security Service (Malta) Limited;
- During emergency situations or where necessary to protect the safety of a person or group of persons;
- Where the personal information is publicly available;
- Where personal information is required by law;
- With your consent where such consent is required by law.

Notification and Consent

The GDPR does not require Security Service (Malta) Limited to obtain your consent for the collection, use or disclosure of personal information for the purpose of establishing, managing or terminating your employment relationship. In addition, we may collect, use or disclose your personal information without your knowledge or consent where we are permitted or required by applicable law or regulatory requirements to do so.

To the extent that your consent is required, we shall ensure that you have consented to Security Service (Malta) Limited collecting, using and disclosing your personal information for the purposes stated above (including any other purposes stated or reasonably implied at the time such personal information was provided to us).

Where your consent was required for our collection, use or disclosure of your personal information, you may, at any time, withdraw your consent, unless such withdrawal may cause Security Service (Malta) Limited not to fulfil its obligations under a legal framework or contractual restrictions. All communications with respect to such withdrawal or variation of consent should be in writing and addressed to our Data Protection Officer (DPO).

How is Your Personal Information Protected?

Security Service (Malta) Limited endeavours to maintain physical, technical and procedural safeguards that are appropriate to the sensitivity of the personal information in question. These safeguards are designed to protect your personal information from loss and unauthorised access, copying, use, modification or disclosure.

How Long is Your Personal Information Retained?

Except as otherwise permitted or required by applicable law or regulatory requirements, Security Service (Malta) Limited endeavours to retain your personal information only for as long as it believes is necessary to fulfil the purposes for which the personal information was collected (including, for the purpose of meeting any legal, accounting or other reporting requirements or obligations). We may, instead of destroying or erasing your personal information, make it anonymous such that it cannot be associated with or tracked back to you.

Updating Your Personal Information

It is important that the information contained in our records is both accurate and current. If your personal information happens to change during the course of your employment, please keep us informed of such changes.

In some circumstances we may not agree with your request to change your personal information and will instead append an alternative text to the record in question.

Access to Your Personal Information

You may ask to see or get a copy of the personal information that we hold about you. If you want to review, verify or correct your personal information, please contact our Data Protection Officer. Please note that any such communication must be in writing. When requesting access to your personal information, please note that we may request specific information from you to enable us to confirm your identity and right to access, as well as to search for and provide you with the personal information that we hold about you. If you require assistance in preparing your request, please contact the Data Protection Officer.

Your right to access the personal information that we hold about you is absolute. There are instances where the personal information may have been destroyed, erased or made anonymous in accordance with our record retention obligations and practices.

In the event that we cannot provide you with access to your personal information, we will endeavour to inform you of the reasons why, subject to any legal or regulatory restrictions.

Inquiries or Concerns?

If you have any questions about this Privacy Policy or concerns about how we manage your personal information, please contact our Data Protection Officer in writing or by e-mail. We will endeavour to answer your questions and advise you of any steps taken to address the issues raised by you.

If you are unsatisfied with the way your data is being handled you have the right to submit a complaint to the relevant Data Protection Authorities. In the case of Malta this is the ***Office of the Information and Data Protection Commissioner***.

Data Protection Officer

As required by the provisions of the GDPR, we have appointed Mr Bernard Vella as the Data Protection Officer for Security Service (Malta) Limited and can be reached on e-mail Bernard.Vella@security.com.mt

Revisions to this Privacy Policy

Security Service (Malta) Limited may from time to time make changes to this Privacy Policy to reflect changes in its legal or regulatory obligations vis-à-vis the manner in which we deal with your personal information. We will communicate any revised version of this Privacy Policy. Any changes to this Privacy Policy will be effective from the time they are communicated, provided that any change that relates to why

we collect, use or disclose your personal information will not apply to you, where your consent is required to such collection, use or disclosure, until we have obtained your consent to such change.

Any interpretation associated with this Privacy Policy will be made by the Data Protection Officer. This Privacy Policy includes examples but is not intended to be restricted in its application to such examples, therefore where the word 'including' is used, it shall mean 'including without limitation. This Privacy Policy does not create or confer upon any individual any rights, or impose upon Security Service (Malta) Limited any rights or obligations outside of, or in addition to, any rights or obligations imposed by the GDPR applicable to such individual's personal information.