



## Rolls-Royce Employee Share Plan Privacy Notice

### Why am I receiving this Notice?

As you will know, we regularly need to process personal data about our staff for various reasons in the course of running the Rolls-Royce business (e.g. for our legitimate business interests, in relation to legal obligations like our rights and duties as an employer, to fulfil our contract with you as an employee, and/or where you have given your consent when this is necessary). As you are eligible to participate in one or more of the Rolls-Royce share plans, this Notice also details the additional ways in which we may control and process your personal data in the course of operating the share plans.

### Do I need to provide data?

Providing your personal data, as we request it during the course of your employment and the operation of our share plans, enables us to run these plans smoothly and for you to benefit from participation in the plans. If you fail to provide the personal data we request, you may be ineligible to participate in some or all of the Rolls-Royce share plans. This is because we will not have the necessary information to grant awards and/or make appropriate decisions during the course of operating such plans.

### What data is collected?

In the course of operating our share plans, the “personal data” we process includes, but is not limited to, your contact details, date of birth, citizenship and residence-related information, bank accounts, tax information and any other pay-related information. We may also need to process “special categories of personal data” (also known as sensitive personal data), which could include records of disabilities, sickness-related absence, trade union membership and any criminal convictions/proceedings (although if this is necessary we will separately ask for your consent).

### Who is controlling your data?

The Rolls-Royce Group will be what is known as the “data controller” of the personal data you provide in relation to your participation in any of the Rolls-Royce Group’ share plan(s) operated from time to time, as it determines why and how your personal data is processed for these purposes. Following the United Kingdom’s departure from the European Union, the UK is treated as a ‘third country’ in relation to processing personal data. The EU has granted the UK a decision of adequacy, however, which means that your data is processed and controlled in a manner which meets standards approved of by the EU.

If you have any queries about this, please contact [data.privacy@rolls-royce.com](mailto:data.privacy@rolls-royce.com).

Your personal data may be provided to any members of the Rolls-Royce Group from time to time and certain other third parties may also receive and process this information (see below under “Transferring your data”).

### What is the purpose and basis for processing?

Your personal data will be processed for the purposes of operating the share plans. We aim to always process personal data in an appropriate and lawful manner in line with relevant data protection principles. As the Rolls-Royce Group operates globally, different laws apply to you depending on where you are based.

#### *Domiciled in the EEA or the UK:*

If you are located in the European Economic Area (EEA) the processing of your data is governed by EU laws, specifically the General Data Protection Regulation (GDPR), and applicable national laws, such as the UK Data Protection Act 2018. The basis on which we process your personal data is the pursuance of the Rolls-Royce Group’



# Rolls-Royce®

“legitimate interests”. In the context of the administration of the Rolls-Royce Group share plans, these legitimate interests may include:

- to operate employee share plans which are in the best interests of the Rolls-Royce Group;
- to allow wealth sharing in the best interests of the Rolls-Royce Group;
- to recruit, reward, retain and/or motivate employees;
- to help align the interests of our employees with the best interests of our shareholders; and
- to more efficiently administrate our share plans.

We will process data in pursuit of our legitimate interests after considering your own interests, rights and freedoms and weighing these up against each other to the extent required by relevant law.

*Domiciled outside of the EEA or the UK:*

If you are located outside of the EEA or the UK, the processing of your data may be governed by local and/or other international laws, as well as the GDPR as mentioned above. By participating in a Rolls-Royce Group share plan, you are deemed to understand and consent to the processing of your personal data, in accordance with this privacy notice.

## **Transferring your data**

In the course of operating our share plans your personal data may, where necessary, be transferred to countries outside of the EEA. Rolls-Royce will ensure that any non EEA country has adequate data protection laws or appropriate safeguards are in place before your personal data is transferred. You can find more details about these safeguards, where applicable, by contacting the Data Privacy team at [data.privacy@rolls-royce.com](mailto:data.privacy@rolls-royce.com).

Your personal data may also be provided to third parties including trustees, registrars, brokers, administrators, regulators and external advisors, who will all be processing data for the same legitimate interests as mentioned above (see “What is the purpose and basis for processing?”).

Anyone processing your personal information is required to implement measures to protect it and is only entitled to process it in accordance with the instructions of Rolls-Royce.

## **How long will we keep your data?**

We keep your data no longer than is necessary to comply with applicable laws. If your data is no longer required for the lawful purposes for which it was obtained, it will be destroyed subject to any contrasting laws or data protection considerations (and for your information, some of the factors which will affect how long we retain your data include your continued employment within the Rolls-Royce Group, and your continued participation in share plans operated within the Rolls-Royce Group).

## **Your rights**

You have a number of rights relating to your personal data and our processing of this data. In most circumstances you can request access to and correction of your personal data (and you can also request the erasure of personal data, and/or object to the processing of your personal data and request a restriction, though this may impact your participation in any given share plan).

## **Questions and who to contact**

If you have any queries, complaints or concerns regarding how we have handled your personal data, you can contact the Data Privacy team, who will investigate the matter, and/ or put you in touch with your local privacy contact.



**Rolls-Royce<sup>®</sup>**

Our Data Privacy team can be contacted at [data.privacy@rolls-royce.com](mailto:data.privacy@rolls-royce.com).

If you are not satisfied with our response or believe our processing of your personal data is in breach of any applicable laws, you can complain to your local supervisory authority. Details of how to do this will be provided by the Data Privacy team when they respond to your complaint.