



## **Data privacy notice for *Employee Share Plans***

### **Why am I receiving this notice?**

As you will know, we regularly process personal data about our employees for various reasons in the course of running the Rolls-Royce business (e.g. for our legitimate business interests; in relation to legal obligations (for example passing information to local tax authorities and other rights and duties as an employer); to fulfil our contract with you as an employee; and/or where you have given your consent). As you may be eligible to participate in the Rolls-Royce discretionary Share Plans, this Notice details the additional ways in which we may control and process your personal data in the course of operating any such plans.

### **Who is controlling your data?**

Rolls-Royce plc (Kings Place, 90 York Way, London, United Kingdom, N1 9FX) will be what is known as the “data controller” of the personal data in relation to your participation in the Share Plans, as it determines why and how your personal data is processed for these purposes.

Contact data protection officer: [Data.Privacy@Rolls-Royce.com](mailto:Data.Privacy@Rolls-Royce.com) .

The company that employs you remains responsible for your data processed there from the HR department and the provision to Rolls-Royce plc.

### **What data is collected?**

In order to operate the Share Plans the ‘personal data’ we process includes in particular your contact details (name, address, e-mail address); date of birth; local tax identification number or other identification documents/numbers required in your country; residence related information; date of joining (and leaving) Rolls-Royce; leaving reason; Workday ID; tax information; and payroll unit and reference number. We also process data in relation to those on long-term leave (e.g. family leave or sick leave) to enable postal communications to this group of people. Your bank details may also be processed for the sale of your shares or when leaving the company. We will never process any special categories of personal data.

### **Purpose and legal basis of data processing**

Your personal data is processed for the purpose of the smooth implementation, termination and administration of the Share Plans and the sale of your shares. Without the required personal data you will not be eligible to participate in Rolls-Royce's share plans.

With regard to the Share Plans, we process your data in order to enable employees to participate in the plans. If you do not have any current or legacy share plans, you can choose to opt out of sharing your data. Information in relation to the Rolls-Royce share plans can be found at [Rolls-Royce | Welcome to Your Shares](#).



As Rolls-Royce is represented worldwide, the legislation or legal basis for data processing may vary depending on the country of location.

***UK locations:***

If your workplace is located within the United Kingdom, the processing of personal data is subject in particular to the “UK General Data Protection Regulation” (UK GDPR). Processing is carried out on the basis of legitimate interest (see legitimate interests under Locations in the EEA).

***Locations in the European Economic Area (EEA):***

If your workplace is located in the EEA, the processing of personal data is subject to EU law and in particular the European General Data Protection Regulation (GDPR). The processing of personal data is based on legitimate interest (Art. 6 para. 1 lit. f) GDPR). In connection with the implementation of the Rolls-Royce share plans, this includes:

- enabling the participation of employees in the Group's share plans
- the recruitment, rewarding, retention and/or motivation of employees;
- reconciling the interests of employees and shareholders; and
- more efficient administration of the share plans.

In addition, the works agreements concluded at the German locations for this purpose constitute a legal basis within the meaning of Art. 88 para. 1 GDPR in conjunction with Section 26 (1) sentence 1 BDSG.

***Locations outside the EEA or UK:***

If you are located outside the EEA or the UK, the processing of your data may be subject to local and/or other international laws as well as the GDPR mentioned above. However, we assume a legitimate interest as mentioned above.

***New employees***

Your data will be shared with our share plan administrator, Equiniti, who will set up an account on your behalf to enable the efficient operation of our Share Plans. Just navigate to your country, then ‘Your Shares: Matched’ and then ‘support’. If you ask for your account to be deleted this will be actioned and no further personal data will be shared with Equiniti.

***Data transfer***

Your data will be passed on to our processor Equiniti Limited for implementation and administration.

For the administration of the Share Plans, your personal data may be transferred to countries outside the EEA and UK. Rolls-Royce will ensure that appropriate data protection laws and safeguards are in place in the countries concerned before transferring personal data. Generally,



standard contractual clauses are used. Further information can be obtained from your data protection officer (see contacts).

Personal data may also be passed on within the Group for efficient and centralised administration (e.g. by Global HRIS) and to third parties such as dispatch service providers, IT service providers, trustees, legal administrators, stockbrokers, administrators, supervisors and external consultants who process data in accordance with the above-mentioned legal bases.

The processing of personal data requires appropriate measures to protect said data and may only be carried out on the instructions of Rolls-Royce.

### Storage duration

The data will only be stored for as long as necessary and to the extent permitted by law. If the personal data is no longer necessary for the lawful purposes for which it was collected, it will be destroyed, unless otherwise required by law or data protection regulations. The retention period will depend on, among other things, your continuous employment with Rolls-Royce and your participation in Rolls-Royce share plans.

### Your rights

You have various rights in connection with the collection and processing of personal data. In most cases, for example, you are entitled to request information about the personal data concerned (right of access) and its portability (right to data portability), to access your personal data and to rectify it. You may also request the erasure of your personal data and/or restrict the processing of personal data, although this may affect your participation in Rolls-Royce share plans.

**You also have the option to opt out of the above-mentioned data processing, which is based on legitimate interests. For more information on how to opt out of the share program, please refer to the detailed information on the share program, or see 'opting out of data sharing' below .**

You have the right to lodge a complaint with the competent supervisory authority.

### Opting out of data sharing

If you wish to opt-out of sharing your data (which will mean that you cannot take part in any share plans that we may operate) then please complete a 'contact us' form which can be found in the 'support' section of [Rolls-Royce | Welcome to Your Shares](#). Please note that if you currently participate in a share plan, or participated previously, there will be restrictions on when your data can be erased due to tax and reporting obligations.

### Questions and contacts

For questions please contact the contact given above or your data protection officer.

Rolls-Royce plc: [data.privacy@rolls-royce.com](mailto:data.privacy@rolls-royce.com)

Rolls-Royce Deutschland Ltd & Co KG: [datenschutz@rolls-royce.com](mailto:datenschutz@rolls-royce.com)

Rolls-Royce Power Systems AG: [dataprotection@ps.rolls-royce.com](mailto:dataprotection@ps.rolls-royce.com)