

## Our Employee Privacy Statement

We have written this Privacy Statement to let you know how Smiths Group uses your personal data in connection with your employment. Smiths needs to process your personal data to enter into our contract of employment with you and to continue to perform crucial aspects of your contract of employment, such as paying you and providing you with benefits. There are also statutory requirements and other contractual requirements we must comply with in relation to your employment.

This Privacy Statement applies to all Smiths Group employees worldwide (i.e., permanent, fixed term or contract employees). For the purposes of this policy, we also treat individual consultants who we engage to work for us on a contract or fixed term basis as "employees".

Our Privacy Statement explains the types of personal data we collect from you, when we collect your personal data and how long we keep it for, how we collect your personal data, our reasons for collecting and using your personal data, information about how we share your personal data etc.

When we say "we", "us", or "our" in this Privacy Statement, we mean the Smiths entity that employs you. This Smiths entity is the data controller of your personal data processed as an employee. Your employing entity is the entity with which you have an employment or consultancy contract. Please contact your local HR representative or submit an enquiry through MyHR for the full name and address of your employing entity.

This Privacy Statement reflects the transparency requirements of the EU GDPR and UK GDPR. This refers to the General Data Protection Regulation of the EU and UK – laws that may (depending on whether you are based with a Smiths entity in the European Union/European Economic Area or UK) govern your rights in relation to your personal data, and how organisations should protect it.

If you have any questions on our Privacy Statement please contact us at [dataprotection@smiths.com](mailto:dataprotection@smiths.com).

## What personal data do you collect from me and use?

We may collect, store, and use the following categories and types of information that relate directly to you and from which you can be identified **if the laws in your country permit us to do so**.

- **identification data**, such as your name, business or personal email address, business or personal address, business or personal telephone numbers, citizenship, passport data and national insurance number.
- **personal information**, such as your date and place of birth, emergency contact details, and gender.
- **contact details**, such as your home address, telephone number and email address.
- **information about your job**, such as your employee number, position, title, employee type, management level, work location, division, department, position level, employee pay groups and job history (including position history, title history, past pay groups and effective dates).
- **performance and disciplinary information**, such as performance reviews, evaluations and ratings, information about disciplinary allegations, the disciplinary process and any disciplinary warnings, details of grievances and any outcome.
- **information about your salary and benefits**, such as your basic salary, bonus, and other benefits entitlements, raise amounts and percentages, accrued salary information, allowances, insurance benefits, pension plans and other information related to your pension plans, tax code and your bank account details and payment dates.
- **information about your access to our network and premises**, such as CCTV images, swipe card access, time recording software and internet, email, and/or telephone access usage.
- **absence information**, such as dates of leave of absence/vacation, maternity/paternity/shared parental leave, confirmation of a birth of a child, training/educational leave, family care leave and medical leave.
- **communications**, such as emails, instant messages, and other communications; and
- **organizational data** including IDs for IT systems and IT access rights, company details and cost centre allocations.

In addition to the collection and use of the personal data listed above, we may also collect, process, and use the following special categories of personal information about you **if the laws in your country permit us to do so**:

- **health and medical data**, such as information about your medical conditions (including medical conditions resulting in mobility issues), sickness absence and reasons for it or vaccine status (if required by law or for other compelling reasons).
- **criminal records data**, relating to any previous criminal convictions or because of a background criminal check; and
- **diversity and inclusion data**, such as your racial origin, religious background, and/or sexual orientation.

## When do you collect my personal data?

We capture your personal data:

- during our recruitment process.
- during the onboarding process at the start of your relationship with Smiths.
- when we pay you and/or review your salary.
- when we provide you with employee benefits.
- when we enroll you into our pension schemes.
- when we conduct performance reviews.
- when we undertake talent management reviews.
- when you make a report to our 'Speak Out' line.
- when you participate in Employee communication platforms such as 'Buzz.'
- during any disciplinary or grievance processes, and
- when you leave your role at Smiths.

In most cases you provide your personal data directly to Smiths or via a Smiths nominated third party e.g., recruitment service provider. However, we may receive information about you from third parties such as government departments, your supervisors, and your colleagues.

In many cases, the provision of your personal data is not required by law. However, we require your personal data to carry out our employment relationship with you and run our business activities. Therefore, if you do not provide your personal data to us, this may result in disadvantages for you - for example, we may not be able to conduct and continue our employment relationship with you.

## What activities do you conduct using my personal data – "*Processing Activities*"?

We collect and use your personal data for a variety of reasons linked with your employment with us. We set out the reasons why we collect and use your data (the Processing Activities) below:

- our recruitment and any pre-employment assessment.
- the contracting process when we employ or engage you.
- our onboarding process when you join us.

- administering and making compensation and salary payments to you.
- administering and providing you with applicable employee benefits and other work-related allowances (to the extent you are eligible for them).
- enrolling you in our pension schemes and for the management of those schemes (to the extent you are eligible for them).
- administering our workforce and managing the employment relationship, including in the following ways:
  - conducting our performance reviews.
  - undertaking talent management reviews.
  - managing your occupational health, as required, or permitted by law.
  - ensuring your health and safety while working for us, and
  - managing any complaints and grievances made by you or which involve you.
- complying with applicable laws and employment-related requirements.
- providing IT systems and support.
- monitoring and ensuring compliance with applicable Smiths policies, procedures, and laws, including conducting investigations subject to applicable laws.
- conducting, facilitating, or supporting due diligence in relation to corporate reorganization or restructurings, outsourcings, divestitures, or mergers and acquisitions.
- managing the end of your employment relationship with Smiths.
- communicating with you, other Smiths employees and third parties.
- communicating with your designated contacts in case of an emergency.
- responding to and complying with requests and legal demands from regulators and other authorities, and
- performance of our business, regulatory and legal obligations.

We do not use your personal data for automated decision-making, including profiling.

## Why do you conduct these Processing Activities using my personal data?

**Performance of the Employment Contract with You:** in most cases, we conduct our Processing Activities using your personal data to meet our obligations in the employment contract

between you and us – e.g., to pay you.

**Legal Requirement:** we also conduct our Processing Activities using your personal data where we are legally required to do so to comply with a legal or regulatory obligation – e.g., to provide the tax authorities with details of your salary. Where this is the case, we will always ensure that we use your personal data only as required by law.

**Other Legal Bases:** there are other legal bases we rely on including: for the legitimate interests of Smiths, Smiths Group or other third parties (such as governmental bodies or courts); or for the protection of vital interests of you or another individual. At times we may receive requests from regulators or other authorised bodies to use your personal data to comply with a legal or regulatory obligation. Where this is the case, we will ensure that the request is legitimate.

**Legitimate Interests:** where we talk about the legitimate interests of Smiths or third parties, we mean:

- management of employment relations including performance, disciplinary and grievance issues.
- assessing your suitability for other roles within Smiths.
- implementation and operation of a group-wide organizational structure and group-wide information sharing.
- operation of a whistleblowing policy.
- physical security, IT, and network security.
- internal investigations.
- conducting alumni activities.
- right to freedom of expression or information.
- prevention of fraud, misuse of company IT systems, or money laundering, and
- proposed mergers and acquisitions.

When we rely on legitimate interests as the basis for processing your personal data, we will balance the legitimate interest pursued by us and any relevant third party, with your interest and fundamental rights and freedoms in relation to the protection of your personal data to ensure it is appropriate for us to rely on legitimate interests and to identify any additional steps we need to take to achieve the right balance.

**Consent:** in limited circumstances, we use your personal data for our Processing Activities because we have your consent to do so. Where this is the case, we will provide you with a separate privacy notice requesting your consent. The provision of your consent is voluntary. You have the right to withdraw your consent at any time with effect for the future by contacting your Divisional HR representative or by other means that may be specifically indicated by us in the context of a processing activity. Your consent may, for example, be required where we handle personal data about any medical conditions that you report to us or for diversity monitoring.

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## For how long do you keep my personal data?

We keep your personal information for no longer than is necessary. We may, for example, keep your personal information for a reasonable time after you have left to ensure that any ongoing obligations can be complied with and to contact you about alumni events or future work opportunities at Smiths. Where personal information is kept, that period will be determined based on applicable local law. For further information, please see the HR Data Retention Policy, which is available in the HR Global Policy Library, or contact us as set out below.

## Your rights in relation to your personal data

We explain here the rights that employees who are based at one of our offices in the European Union/European Economic Area or UK may have in relation to personal data:

### ***How can I find out what personal data you hold about me?***

If you are based in one of our offices in the European Union/European Economic Area or UK, contact your Divisional HR representative if you would like more specific information about what personal data we have collected from you including the categories of personal data processed, the purposes of the processing, the retention period, the third parties to whom that data is transferred and, in case of a transfer to a country without sufficient protection of personal data, the appropriate safeguards applied. You may also request a copy of your data. Note that we do have to consider the interests of others, and certain other legal obligations or restrictions, so this is not an absolute right.

### ***Can I ask you to delete or correct my personal data?***

If you are based in one of our offices in the European Union/European Economic Area or UK, contact your Divisional HR representative if you would like us to delete your personal data or to have your personal data corrected and, if required to do so, we will comply with your request.

### ***Can I ask you to stop using my personal data?***

If you are based in one of our offices in the European Union/European Economic Area or UK, contact your Divisional HR representative if you would like us to stop using your personal data (either entirely or for some of our Processing Activities) and, if required to do so, we will comply with your request.

### ***Can I ask you to transfer my personal data to a third party?***

If you are based in one of our offices in the European Union/European Economic Area or UK, contact your Divisional HR representative if you would like us to transfer your personal data you provided to us to a third party in a structured, commonly used and machine-readable format and, if required to do so, we will comply with your request.

## Do you securely store my personal data?

We apply strict security standards, controls, and processes to protect your personal information from unauthorised access, loss, or accidental deletion. Our Data Protection Code of Conduct also sets out Smiths standards for collecting and handling personal data. These include restricting who can have access to your personal data and protecting your data with security tools appropriate to the type of information e.g., encryption software and secure file transfer tools. We also require that our third-party processors who handle your personal data do the same.

## Do you share my personal data with third parties?

To help us carry out our Processing Activities, we may need to share your personal data with entities within and outside of Smiths Group as follows:

- **Smiths Entities** – due to our matrix and corporate structure, we may transfer your data to other Smiths Group entities, in particular to (i) the Smiths entity at the headquarters for the Smiths Division that you work for, and (ii) Smiths Group Plc, who may collect, transfer and/or use the personal data we have collected from you for some or all of our Processing Activities. Where we share your personal information with other Smiths Group entities, they will use your information in a manner consistent with the purposes for which it was originally collected and consistent with this Privacy Statement and applicable data protection and privacy laws.
- **Our Data Processors** – from time to time, we may share your personal data with our third party service providers or with other Smith Group entities who provide us with investor relationship, company secretarial, legal, regulatory, corporate advisory, event management, talent management, recruitment, marketing, communication and/or IT support services ("Data Processors"). To provide such services, our Data Processors process your personal data on our behalf. Our Data Processors have met our criteria as trusted guardians of personal data and are subject to contractual obligations to implement appropriate security measures to safeguard your personal data and to process personal data only as instructed by us.
- **Other Third Parties** – your personal data may also be transferred to regulators, courts, and other authorities (e.g., tax and law enforcement authorities) and independent external advisors (e.g., lawyers, auditors). We may also share certain personal data with business partners, customers, and suppliers to conduct our business activities.

For the full list of the Smiths Group entities and third parties that we may share your data with, please contact us at [dataprotection@smiths.com](mailto:dataprotection@smiths.com).

## Do you transfer my personal data overseas?

Some of the Smiths Group entities, Data Processors and other third parties that we share your personal data with are located outside of the European Economic Area (EEA) or UK, respectively.

If we transfer your personal data from the UK or EEA to entities outside of the UK or EEA, to a country that is not officially recognized as providing an adequate level of data protection, we will apply safeguards to make sure that your data is being protected as required by applicable data protection law. This includes the most recent Standard Data Protection Clauses, the respective UK addendum, the UK International Data Transfer Agreement, each as applicable, and other safeguards that may be available. Where necessary, we also apply supplementary measures to ensure a sufficient level of data protection, taking account of the situation in the recipient country.

You can ask for a copy of the appropriate safeguards by contacting us at [dataprotection@smiths.com](mailto:dataprotection@smiths.com).

## **What should I do if I am not happy with how my information is being used?**

If you are not happy with how your information is being used or you would like more information about our use of the data, you may contact Smiths Office for Data Protection Compliance at:

Office for Data Protection Compliance  
Smiths Group PLC  
10<sup>th</sup> Floor, Arbor  
255 Blackfriars Rd  
London SE1 9AX  
T: +44 (0) 20 7004 1600  
F: +44 (0) 20 7004 1644  
E: [dataprotection@smiths.com](mailto:dataprotection@smiths.com)

You also have the right to complain to our relevant supervisory authority, which is the Information Commissioner's Officer (ICO) in the UK, or to any other competent data protection supervisory authority. You can contact the ICO at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Tel: 0303 123 1113

For employees based in offices in the European Union, contact details of data protection supervisory authorities can be found here: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en).