
Employee Data Privacy Notice – UK

July 2022

This Notice is issued by the Sumitomo Mitsui Financial Group companies listed in Part A of this Notice ("we", "our", "us" or "SMBC"). The company that employs you is the one named on your contract of employment; this company is the "data controller" in relation to information collected about you during your employment.

SMBC collects and processes personal data relating to our employees to manage the employment relationship. We treat the privacy of our workers' data very seriously and we take appropriate security measures to safeguard the privacy of your data. SMBC recognises and complies with your data privacy rights as set out in the General Data Protection Regulations (GDPR). This Privacy Notice explains how we, as data controller, protect and manage the personal data* you share with us and the information that we retain, including how we collect, process and share (where appropriate) that data, and your data privacy rights.

*Personal data means any information that relates to an identified or identifiable individual, for example; a first and last name, a home or other physical address, an email address or other contact information, bank details or medical information. In addition to factual information, it can also include any expression of opinion about an individual and any indication of the intentions of SMBC or any other person in respect of an individual.

Personal data we collect

The sort of information that SMBC collects and processes includes, but is not limited to:

- a) Personal details such as your full name, address and contact details, including email address and telephone number, your date, town, and country of birth, gender;
- b) The terms and conditions of your employment;
- c) Details of your qualifications, skills, experience, employment history, including start and end dates with previous employers and with SMBC and references from previous employers;
- d) Information about your nationality and entitlement to work in the UK;
- a) Information from our vetting company, which may include results from consumer credit and criminal record checks;
- e) Information about your remuneration, including entitlement to benefits such as pensions or insurance cover;
- f) Details of your bank account number and National Insurance Number;
- g) Information about your marital status, next of kin, dependants and emergency contacts;
- h) Details of your schedule (days of work and working hours) and attendance at work;
- i) Details of periods of leave taken by you, including holiday, sickness absence, family leave and sabbaticals, and the reasons for the leave;
- j) Details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence;
- k) Assessments of your performance, including performance snapshots, annual reviews and personal performance ratings, training you have participated in, performance improvement plans and related correspondence;
- l) Information about medical or health conditions, including whether or not you have a disability for which we need to make reasonable adjustments;
- m) Details of trade union membership;

- n) Biometric data (including finger print information and facial recognition profiles), for security reasons or for access to our systems;
- o) Equal opportunities monitoring information, including information about your ethnic origin, sexual orientation and health;
- p) Information relating to your continued fitness and propriety for the purpose of the Senior Managers and Certification Regime (SMCR); and
- q) Current Certification Employee status, including the certification functions that are applicable to you and your role; and information required for a regulatory submission in relation to the Senior Managers Regime, including the receipt of regulatory approval.

Where we collect personal data from

We collect this information in a variety of ways. For example, data is collected through applications forms, CVs or resumes, obtained from your passport or other identity documents such as your driving licence, from forms completed by you at the start of or during employment (such as benefits nomination forms), from correspondence with you, or through interviews, meetings or other assessments, when you complete employment surveys and when you use our systems, tools and websites.

Much of the information we hold will have been provided by you, but some information may come from other internal sources, such as your manager/department manager and colleagues. In some cases, we collect personal data about you from third parties, such as recruitment agencies, referees at previous employers and other employment vetting sources. We only obtain information from third parties if this is permitted by law.

How and why we use your personal data

As your employer, SMBC needs to collect and process information about you to enter into an employment contract with you and to meet our obligations under your employment contract. For example, we need to process your data to provide you with an employment contract, to pay you in accordance with your employment contract and to administer benefit, pension and insurance entitlements.

In some cases, SMBC needs to process data to ensure that it is complying with its legal and regulatory obligations. For example, we are required to check an employee's entitlement to work in the UK, to deduct tax, to comply with health and safety laws and to enable employees to take periods of leave to which they are entitled.

In other cases, SMBC has a legitimate interest in processing personal data before, during and after the end of the employment relationship. Processing employee data allows SMBC to:

- Run recruitment and promotion processes;
- Maintain accurate and up to date employment records and contact details (including details of who to contact in the event of an emergency) and records of employee contractual and statutory rights;
- Operate and keep a record of employee performance and related processes, to plan for career development, and for succession planning and workforce management purposes;
- Operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace;
- Ensure employees are complying with relevant policies and procedures;

- Operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled;
- Operate and keep a record of other types of leave (including maternity, paternity, adoption, parental, shared parental leave and parental bereavement leave) to allow effective workforce management, to ensure that the organisation complies with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled;
- Obtain occupational health advice, to ensure that it complies with duties in relation to individuals with disabilities, meet its obligations under health and safety law, and ensure that employees are receiving pay or other benefits to which they are entitled;
- Ensure effective general HR and business administration;
- Conduct employee engagement surveys;
- Obtain and provide references on request for current or former employees;
- To comply with rules and regulations that apply to us;
- Respond to and defend against legal claims;
- Maintain and promote equality in the workplace; and
- Ensure the security of premises, data and technology. We may use your biometric data for security reasons, in order to verify your identity where specific security clearance is required before you can access to specific systems. We may use your biometric data where you opt to use a finger print reader, allowing you easy access to your work station. Facial recognition technology is used in our offices in 100 Liverpool Street.

A legitimate interest will apply only where we consider that it is not outweighed by an individual's interests or rights which require protection of their personal data.

Some special categories of personal data, such as information about health or medical conditions, or racial or ethnic origin, is processed to carry out employment law obligations (such as those in relation to employees with disabilities, for health and safety purposes and to ensure that employees have the right to work in the UK).

SMBC also processes special categories of personal data, such as information about ethnic origin, sexual orientation and health, for the purposes of equal opportunities monitoring. We invite employees to update your diversity information on ethnicity, sexual orientation and disability in Oracle – by doing so, you will help us to understand the make-up of our people so that we can create an inclusive environment where everyone is encouraged to bring their authentic selves to work every day. Only a small group of HR colleagues can view your diversity information and any reporting will be on an aggregated (i.e. anonymous) basis.

The organisation may process criminal records data to assess your suitability for employment both when you are recruited (through appropriate criminal records checks) and in the course of your employment, for example to investigate and take appropriate action if you are suspected of committing an offence (whether at or outside work).

You will, of course, inevitably be referred to by name in SMBC's documents and records that are produced by you and your colleagues in the course of carrying out your duties and the business of SMBC (for example, emails and letters). You should refer to the Conduct and Compliance and Codes of Practice sections in the employee handbook, which is available on EMEA Insight or HR Sharepoint. In addition, we monitor computer and telephone/ mobile telephone use and email and instant messaging (Electronic mail), as detailed in the employee handbook.

Retention of your personal data

We keep information in line with our Retention Policy, which is available in the Compliance section of the intranet. These retention periods are in line with the length of time we need to keep your personal information in order to run the business and manage our relationship with you effectively, during the recruitment process, whilst you are working for us, at the time when your employment ends and after you have left. They also take into account our need to meet any legal, statutory and regulatory obligations. These reasons might vary from one piece of information to the next. In all cases our need to use your personal information will be reassessed on a regular basis and information which is no longer required will be disposed of.

If in the future we intend to process your personal data for a purpose other than that which it was collected we will provide you with information on that purpose and any other relevant information.

Who has access to your data

SMBC aims to hold your data electronically in HR systems, databases and file structures wherever possible. This allows us to place the appropriate security around access to the data. In some cases personal information may be held in hardcopy format in physical files which will be stored in secure filing cabinets. For the most part your data will be held in the country you are located in or the EEA.

Your information will be shared internally, including with members of the HR (including payroll), your line manager, managers in the business area in which you work and IT staff if access to the data is necessary for performance of their roles.

We may transfer information about you to other SMBC companies for purposes connected with your employment, or the management of the company's business.

We may disclose information about you to third parties if you give or make a request (e.g. sending a letter to your mortgage provider confirming your salary), where we are legally obliged to do so, or where we need to comply with our contractual duties to you. For instance, we share data with third parties that process data on our behalf, such as payroll, pension, or benefit providers (when you have elected to join schemes) or occupational health providers. We also share data with our regulators and/or public or government authorities such as the financial services sector regulators, income tax authority and immigration authority. We may also share your data with third parties to obtain employment references from other employers or to provide employment references to future employers, obtain employment background checks from third-party providers or obtain necessary criminal records checks from the Disclosure and Barring Service. SMBC may also share your data with third parties in the context of a sale of some or all of its business; in those circumstances the data will be subject to confidentiality arrangements.

Examples of organisations with whom we share information include, but are not limited to:

- a) Payroll Provider
- b) Pension Provider
- c) Private Medical Plan
- d) Group Life Cover Scheme
- e) Staff Group Income Protection Provider
- f) Tax & Business Immigration Service Provider
- g) Bike Scheme
- h) Gym Memberships
- i) Training consultants

- j) Charitable Giving
- k) Regulators (PRA and FCA)
- l) HMRC

In limited and necessary circumstances, your information may be transferred outside of the EEA, for example, our HR recordkeeping database is hosted in New York, or if you are seconded to an SMBC company outside the EEA. For business reasons, we share your information with colleagues in Tokyo on a need to know basis. In all these cases we have data transfer agreements between SMBC EMEA locations and other SMBC companies. These agreements ensure a minimum standard of how to collect, store, process and share information and a high standard of information security.

Where we transfer your personal data outside the UK, we will ensure that it is protected in a manner that is consistent with how your personal data will be protected by us in the UK. This can be done in a number of ways, for instance, using standard data protection clauses or binding corporate rules.

In other circumstances the law may permit us to otherwise transfer your personal data outside the EEA. In all cases, however, we will ensure that any transfer of your personal data is compliant with data protection law.

You can obtain more details about the protection given to your personal data when it is transferred outside the EEA (including a copy of the standard data protection clauses which we have entered into with recipients of your personal data) by contacting us in accordance with the “Important Information” section below.

How we protect your data

SMBC takes the security of your data seriously. SMBC has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.

Where SMBC engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

What an individual’s rights are in relation to personal data

An individual will have certain rights in relation to their personal data. Some of these rights will only apply in certain circumstances. If you would like to exercise, or discuss, any of these rights you should submit your request in writing or by email to Human Resources and provide sufficient information to allow us to understand the scope of the request.

- **Access:** an individual has the right to obtain information regarding the processing of their personal data and access to particular personal data we hold about you.
- **Correction:** an individual is entitled to request that any incomplete or inaccurate personal data we hold about you is corrected. At SMBC we enable you to validate and update some of your personal information through our secure Self Service system. Further information on how to change your data can be found on EMEA Insight or HR Sharepoint.
- **Erasure:** an individual has the right to request that we erase your personal data in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal data but we are legally entitled to retain it. Data is retained in line with the Retention Policy.
- **Restriction:** an individual is entitled to ask us to suspend the processing of their personal data, for example if they want us to establish its accuracy.

- **Objection:** where we are processing personal data based on legitimate interests (or those of a third party) an individual may challenge this. However, we may be entitled to continue processing personal data based on our compelling legitimate interests or where this is relevant to legal claims.
- We currently do not carry out any automated decisions based on your personal data.

Important Information

If you would like to invoke any of the above rights with us, have any questions or queries which are not answered by this Privacy Notice, or have any potential concerns about how we may use the personal data we hold please contact your HR Manager or email the Privacy Office on SMBCPrivacyOffice@gb.smbcgroup.com.

You can find out more information about your rights by contacting the Information Commissioner's Office, or by searching their website at <https://ico.org.uk/>. If you believe that SMBC has not complied with your data protection rights, you can complain to the Information Commissioner.

What if I do not provide personal data?

You have some obligations under your employment contract to provide the organisation with data. In particular, you are required to report absences from work and may be required to provide information about disciplinary or other matters under the implied duty of good faith. You may also have to provide SMBC with data to exercise your statutory rights, such as in relation to statutory leave entitlements. Failing to provide the data may mean that you are unable to exercise your statutory rights.

Certain information, such as contact details, your right to work in the UK and payment details, have to be provided to enable SMBC to enter into a contract of employment with you. If you do not provide other information, this will hinder SMBC's ability to administer the rights and obligations arising as a result of the employment relationship efficiently.

Privacy Notice changes

This Privacy Notice is regularly reviewed. This is to make sure that we continue to meet the highest standards and to protect your privacy. We reserve the right, at all times, to update, modify or amend this Notice. We suggest that you review this Privacy Notice from time to time to ensure you are aware of any changes we may have made, however, we will not significantly change how we use information you have already given to us without prior agreement. The latest version of this policy can be found on EMEA Insight or HR Sharepoint.

PART A – SUMITOMO MITSUI FINANCIAL GROUP DETAILS AND HOW TO CONTACT US

How to Contact Us

If an individual wishes to exercise their individual rights, or to raise any questions, concerns or complaints concerning this Notice or our data practices, they can contact us at the relevant address below.

Alternatively, our Privacy Office can be contacted at: SMBCPrivacyOffice@gb.smbcgroup.com.

| SMFG Companies covered by this Notice | Address | Telephone |
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| SMBC Bank International plc | 100 Liverpool Street, London, EC2M 2AT | Tel. +44 (0)20 7786 1000 |
| Sumitomo Mitsui Banking Corporation, London Branch | 100 Liverpool Street, London, EC2M 2AT | Tel. +44 (0)20 7786 1000 |
| SMBC Nikko Capital Markets Ltd | 100 Liverpool Street, London, EC2M 2AT | Tel: +44 (0)20 3527 7000 |
| Sumitomo Mitsui Finance and Leasing London Branch | 100 Liverpool Street, London, EC2M 2AT | Tel. +44 (0)20 7786 1000 |
| SMBC Leasing (UK) Limited | 100 Liverpool Street, London, EC2M 2AT | Tel. +44 (0)20 7786 1000 |