



Simply Blue
Group

General Privacy Notice


SBG-SBG-GRP-BSO-PCY-0008

Document Control

June 2024

1 Contents

- 1 INTRODUCTION..... 3**
 - 1.1 PURPOSE..... 3
 - 1.2 OUR POLICY ON PRIVACY AND DATA PROTECTION..... 3
 - 1.3 DEFINITIONS..... 4
 - 1.4 SCOPE AND APPLICABILITY 7
 - 1.5 CONTACT US 7
- 2 PERSONAL DATA WE COLLECT 8**
- 3 HOW WE KEEP YOUR PERSONAL DATA SAFE..... 8**
- 4 HOW WE USE YOUR PERSONAL DATA 11**
 - 4.1 YOUR PERSONAL DATA AND THIRD PARTIES..... 11
- 5 COMPLIANCE WITH OUR LEGAL AND REGULATORY OBLIGATIONS 13**
- 6 INTERNATIONAL TRANSFERS OF DATA 14**
- 7 RETENTION OF YOUR PERSONAL DATA 15**
- 8 YOUR RIGHTS AND CHOICES WITH REGARDS TO YOUR PERSONAL DATA 16**
- 9 CHANGES TO THIS NOTICE 17**
- APPENDIX 18**
 - 9.1 APPENDIX 1 – LIST OF JURISDICTIONS WHERE SIMPLY BLUE OPERATES AND CORRESPONDING SUPERVISORY
AUTHORITIES 18

Document title	Date	Author	Reviewed By	Status	Page 2 of 19	
Personnel Privacy Notice SBG-SBG-GRP-BSO-PCY-0008 – R00	11.04.2024	KPMG	CR/AK	IFU		

1 Introduction

1.1 Purpose

Simply Blue is committed to protecting the privacy and security of your Personal Data.

This Privacy Notice is for the attention of any individual who engages with Simply Blue and who is not a member of Simply Blue Personnel. A separate privacy notice exists for Simply Blue Personnel. “Simply Blue”, or “us” or “we” are in reference to Simply Blue Holdings Limited and its subsidiaries, where the ownership of Simply Blue Holdings Limited exceeds 50% of the voting shares in such subsidiaries. Simply Blue is the Data Controller, and in some cases, the Data Processor, of Personal Data for the purposes of Data Protection Legislation.

In our obligation as a Data Controller, we are required under Data Protection Legislation to notify you of the information contained in this Privacy Notice.


It is important that you read this notice in conjunction with the Simply Blue Data Protection Policy. In addition, it is important that you read this Notice, together with any other privacy notice we may provide to you on specific occasions when we are collecting or processing Personal Data about you, so that you are aware of how and why we are using such Personal Data. Please note that we reserve the right to amend and/or update this notice at any time.

1.2 Our policy on Privacy and Data Protection

Simply Blue is committed to protecting the privacy and security of your Personal Data. This Privacy Notice describes how we collect and use Personal Data about you throughout the duration and following your engagement with us.

This Privacy Notice describes the Personal Data handling practices of Simply Blue with respect to:

- What Personal Data we collect;
- How we keep your Personal Data safe;
- How we use your Personal Data;

Document title	Date	Author	Reviewed By	Status	Page 3 of 19	
Personnel Privacy Notice SBG-SBG-GRP-BSO-PCY-0008 – R00	11.04.2024	KPMG	CR/AK	IFU		

- Compliance with our legal and regulatory obligations;
- International Transfers of data;
- Retention of your Personal Data; and
- Your rights and choices with regards to your Personal Data.


Please note that we may share your Personal Data within the Simply Blue group of companies “Simply Blue Group” if required:

- (ii) For administrative or management purposes;
- (iii) To comply with regulatory and legal requirements, and/or to obtain advice or assistance on those requirements; and /or
- (iv) Under a Simply Blue policy or process.


1.3 Definitions

For the purposes of this Privacy Notice, the following definitions are provided:

- **‘Candidate information’:** data that may be used and processed during this activity includes resume, application form, interview information, search and employment firm reports, background/reference checks, work experience and reference information.
- **‘Contact information’:** this data may be work and personal where required. Contact information includes address, telephone number, mobile number, email address, emergency contact information and emergency contact details.
- **‘Criminal Convictions’:** is any Personal Data relating to criminal convictions and offences in the context of criminal activity, allegations, investigations, and proceedings.
- **‘Data Controller’:** is the natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the Processing of Personal Data; where the purposes and means of such Processing are determined by EU or Member State laws, the Data Controller or the specific criteria for its nomination may be provided for by those laws.


Document title	Date	Author	Reviewed By	Status	Page 4 of 19	
Personnel Privacy Notice SBG-SBG-GRP-BSO-PCY-0008 – R00	11.04.2024	KPMG	CR/AK	IFU		

- **‘Data Processor’:** is a natural or legal person, public authority, agency, or any other body which Processes Personal Data on behalf of a Data Controller.
- **‘Data Subject’:** is an individual person that can be identified, directly or indirectly, via an identifier such as a name, an ID number, location data, an online identifier or one or more factors specific to the person’s physical, physiological, genetic, mental, economic, cultural, or social identity. In other words, a Data Subject is a user whose Personal Data can be collected. In the context of this Privacy Notice, Data Subjects are individuals which include interview candidates and prospective employees, business associates, suppliers, shareholders/investors, directors, guests, members of the public and any other parties that Simply Blue engages with and where Personal Data is held.
- **‘Event related information’** This includes data collected about an individual for the purpose of facilitating that individual’s attendance at an Simply Blue organized event or an event which the individual attends as a guest of Simply Blue. This may include travel arrangements, accommodation arrangements, specific access requirements or accommodations and dietary requirements;
- **‘Financial information’:** Simply Blue may request and process credit card and bank account details, and other payroll, invoice payment and business expense reimbursement data.
- **‘Head of Compliance’:** is responsible for all aspects of regulatory compliance in Simply Blue. This individual has also been assigned responsibility for data protection, including monitoring internal compliance, informing, and advising on data protection obligations, providing advice regarding Data Protection Impact Assessments (“DPIAs”) and acting as a contact point for Data Subjects and the various Supervisory Authorities.
- **‘Personal Data’:** is any information relating to an identified or identifiable natural person; an identifiable person is one who can be identified, directly or indirectly, in particular by

Document title	Date	Author	Reviewed By	Status	Page 5 of 19	
Personnel Privacy Notice SBG-SBG-GRP-BSO-PCY-0008 – R00	11.04.2024	KPMG	CR/AK	IFU		

reference to an identifier such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person. This includes data held on Data Subjects that Simply Blue engages with.

- **‘Personal identification’:** this includes data such as name, gender, photograph, date of birth, residency, place of birth, nationality, national identifier, passport number & copy, driver’s license number & copy, work permit number, and tax identification number.
- **‘Personnel’:** refers to employees, secondees, interns, contractors, consultants and anyone that works for or on behalf of Simply Blue.
- **‘Process or Processing’:** is any operation or set of operations performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.
- **‘Simply Blue’:** in instances where “Simply Blue” is mentioned, it is in reference to Simply Blue Holdings Limited and its subsidiaries, where the ownership of Simply Blue Holdings Limited exceeds 50% of the voting shares in such subsidiaries. Simply Blue is the Data Controller, and in some cases, the Data Processor, of Personal Data for the purposes of data protection legislation. When referring to “Simply Blue”, it is in relation to Simply Blue, its personnel, and third parties that process Personal Data for or on behalf of Simply Blue.
- **‘Special Categories of Personal Data’:** is any Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely

Document title	Date	Author	Reviewed By	Status	Page 6 of 19	
Personnel Privacy Notice SBG-SBG-GRP-BSO-PCY-0008 – R00	11.04.2024	KPMG	CR/AK	IFU		

identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

- **'Third party'**: refers to a natural or legal person, public authority, agency or body other than Simply Blue that is authorised to process Personal Data for or on behalf of Simply Blue.


1.4 Scope and Applicability

This Notice applies to Simply Blue as defined above. The Notice applies to all processing of Personal Data within Simply Blue, either in the capacity as Data Controller or as Data Processor. This Privacy Notice applies to any individual who engages with Simply Blue and who is not a member of Simply Blue Personnel.

1.5 Contact Us

If you are unfamiliar with our terms provided in this Notice, or require further details or clarification on any of the information within this Notice, please contact the Head of Compliance, as per the details provided below:

Email: data.protection@simplybluegroup.com

Document title	Date	Author	Reviewed By	Status	Page 7 of 19	
Personnel Privacy Notice SBG-SBG-GRP-BSO-PCY-0008 – R00	11.04.2024	KPMG	CR/AK	IFU		

2 Personal Data we Collect

Simply Blue may collect and process Personal Data about you which may be generally described as follows:

- For interview candidates and prospective employees: Candidate information during the initial hiring process (e.g., recruitment, application, and interview);
- For business associates and suppliers - your business Contact information;
- For investors/shareholders - Personal identification, Contact information, Financial information and Event related information;
- For directors appointed to the boards of Simply Blue or any of its affiliates - Personal identification, Contact information, Financial information and Event related information, information on other directorships held;
- For guests - Contact information, Personal identification and Event related information;
- For public representatives - Contact information and information recording our engagement with you in accordance with applicable law (e.g lobbying laws)
- For members of the public - who engage with Simply Blue at stakeholder events or through a stakeholder forum or other means of communication, or who engage with Simply Blue as part of a public consultation process designated by law, regulation, administrative requirements or otherwise.

We may collect Personal Data from you or external sources, for example when you apply for a job (e.g external reference checks) or make a submission in response to a public consultation process (e.g where such information is available from a public authority).

The Personal Data collected may include the following types of Personal Data, as defined above, however please note, this is not intended to be an exhaustive list, and Simply Blue may hold/request additional Personal Data relating to Data Subjects if required:

- Personal identification;
• Candidate information
• Contact information;


Table with 6 columns: Document title, Date, Author, Reviewed By, Status, Page 8 of 19, and Simply Blue Group logo.

- Event related information;
- Financial information;
- Special Categories of Personal Data (only to the extent necessary); and
- Criminal Convictions data (where required by law).

From time to time Simply Blue may need to ask for Data Subjects' consent to the processing of their Special Category Data or information about Criminal Convictions. In such an instance Simply Blue will tell the Data Subject what Personal Data Simply Blue is processing and why Simply Blue is doing it. Any consent given can be withdrawn by the Data Subject at any time.

Generally, we receive your Personal Data in one of three ways:


- Directly from you (e.g., Personal Data you enter on a job application form);
- Indirectly (e.g., from a publication authority record or other public register); or
- From an authorized third party (e.g., former employers, recruiters, online searches, and credit and background check agencies).

Document title	Date	Author	Reviewed By	Status	Page 9 of 19	
Personnel Privacy Notice SBG-SBG-GRP-BSO-PCY-0008 – R00	11.04.2024	KPMG	CR/AK	IFU		

3 How we keep your Personal Data safe

We use appropriate technical and organisational measures that comply with applicable law to protect the Personal Data that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your Personal Data.

At Simply Blue, we keep our computers, personnel files and buildings secure at all times. If you contact us about your Personal Data, we may ask you to identify yourself. This is to help protect your Personal Data.

Document title	Date	Author	Reviewed By	Status	Page 10 of 19	
Personnel Privacy Notice SBG-SBG-GRP-BSO-PCY-0008 – R00	11.04.2024	KPMG	CR/AK	IFU		

4 How we use your Personal Data

We use Personal Data about you:


- To consider your job application and your suitability for employment with Simply Blue;
- To conduct business conversations and engagement with you;
- To maintain and develop our business relationship with you;
- To facilitate your participation as a shareholder or investor in Simply Blue;
- To facilitate your appointment as a director in Simply Blue or any of its affiliates under the relevant company law requirements;
- To process payments to you and to make the appropriate statutory and tax deductions;
- To facilitate your presence and/or engagement at events and/or consultation processes conducted by or on behalf of Simply Blue;
- To protect your interests, that of Simply Blue and of its stakeholders;
- As required under Simply Blue’s policies and procedures; and/or
- To comply with regulatory and legal requirements, and/or to obtain advice or assistance on those requirements.

Please note this list is non-exhaustive. If you require any further information or clarification in this regard, please contact the Head of Compliance at the contact details provided in Section 1.5 of this Notice.

4.1 Your Personal Data and third parties

We sometimes use third parties to process Personal Data on our behalf. We may disclose your Personal Data to the following categories of recipients:


- To our third-party services providers and partners who provide data processing services to us.
- To any competent law enforcement body, regulator, government agency, court or other third party where we believe disclosure is necessary: (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital

Document title	Date	Author	Reviewed By	Status	Page 11 of 19	
Personnel Privacy Notice SBG-SBG-GRP-BSO-PCY-0008 – R00	11.04.2024	KPMG	CR/AK	IFU		

interests or those of any other person, or (iv) to facilitate a purchase or transaction with an investor;

- To a potential investor (and its agents and advisers) in connection with any proposed investment in or purchase, merger or acquisition of any part of our business, provided that we inform the investor that it must use your Personal Data only for the purposes disclosed in this Privacy Notice; and/or
- To a person you have given us your consent to disclose to.

Please note this list is non-exhaustive. These third parties and any other third parties we might share Personal Data with are expected to have the same levels of Personal Data protection that we have. For more information on the third parties involved in the processing of your Personal Data on behalf of Simply Blue please contact the Head of Compliance using the contact details set out in Section 1.5 of this Notice.


Document title	Date	Author	Reviewed By	Status	Page 12 of 19	
Personnel Privacy Notice SBG-SBG-GRP-BSO-PCY-0008 – R00	11.04.2024	KPMG	CR/AK	IFU		

5 Compliance with our legal and regulatory obligations

To process your Personal Data lawfully, we will rely on one or more of the following legal bases for processing:

- Legal/Regulatory obligations;
- Performance of a contract or other terms of engagement with you;
- Public interest;
- Our legitimate interests;
- The establishment, exercise or defence of legal claims;
- For the purposes of preventative or occupational medicine or the assessment of working capacity; or
- Your consent.


To comply with our regulatory, contractual, and legal requirements, we must keep Personal Data about all Simply Blue Personnel up to date and review it regularly.

Document title	Date	Author	Reviewed By	Status	Page 13 of 19	
Personnel Privacy Notice SBG-SBG-GRP-BSO-PCY-0008 – R00	11.04.2024	KPMG	CR/AK	IFU		

6 International Transfers of Data

We may transfer your Personal Data outside of the European Economic Area (“EEA”) or the United Kingdom (“the UK”).


However, we have taken appropriate safeguards to require that the Personal Data we process will remain protected in accordance with this Privacy Notice when transferred internationally, including when processed internationally by our third-party service providers and partners. We expect that the same standard of data protection be applied outside of the EEA / UK to these transfers and processing of Personal Data, to ensure your rights continue to be protected.

Document title	Date	Author	Reviewed By	Status	Page 14 of 19	
Personnel Privacy Notice SBG-SBG-GRP-BSO-PCY-0008 – R00	11.04.2024	KPMG	CR/AK	IFU		

7 Retention of your Personal Data

We will retain Personal Data we collect from you to comply with our legal, contractual, and regulatory obligations and to address and respond to any legal matter which may arise.

When we have no ongoing legitimate interest or lawful basis to process your Personal Data, we will either delete or anonymize it or, if this is not possible (for example, because your Personal Data has been stored in backup archives), we will securely store your Personal Data and isolate it from any further processing until deletion is possible.


Document title	Date	Author	Reviewed By	Status	Page 15 of 19	
Personnel Privacy Notice SBG-SBG-GRP-BSO-PCY-0008 – R00	11.04.2024	KPMG	CR/AK	IFU		

8 Your rights and choices with regards to your Personal Data

You have the following data protection rights:


- You can ask us for a copy of any Personal Data we retain on you and further details about how we collect, share, and use your Personal Data by making a Data Subject access request. You can do so at any time by contacting the Head of Compliance at data.protection@simplybluegroup.com;
- You can object to the processing of your Personal Data, ask us to restrict processing of your Personal Data or request portability of your Personal Data. You can exercise these rights by contacting the Head of Compliance at data.protection@simplybluegroup.com.
- Similarly, if we collect and process your Personal Data with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your Personal Data conducted in reliance on lawful processing grounds other than consent;
- You have the right to complain to the relevant data protection authority about our collection and use of your Personal Data. For more information about your data subject rights, please contact your respective data protection authority (See [Appendix 1](#) for more information on the relevant supervisory authority within your jurisdiction); and
- You may ask us to delete your Personal Data; however, this will not apply where it is necessary for Simply Blue to process your data for the performance of a contract or for another legal reason. If this is the case, we will be required to retain the relevant Personal Data.

Whenever you contact Simply Blue to enquire about your Personal Data, we may ask you to identify yourself. This is to help protect your Personal Data.

Document title	Date	Author	Reviewed By	Status	Page 16 of 19	
Personnel Privacy Notice SBG-SBG-GRP-BSO-PCY-0008 – R00	11.04.2024	KPMG	CR/AK	IFU		

9 Changes to this notice

This notice is reviewed as required. We will update this Notice periodically, particularly when we change how we use your Personal Data. You can find an up-to-date version of this notice on <https://simplybluegroup.com>.

Document title	Date	Author	Reviewed By	Status	Page 17 of 19	
Personnel Privacy Notice SBG-SBG-GRP-BSO-PCY-0008 – R00	11.04.2024	KPMG	CR/AK	IFU		

Appendix

9.1 Appendix 1 – List of jurisdictions where Simply Blue operates and corresponding Supervisory Authorities

The below table depicts the jurisdiction, overarching regulation in said jurisdiction and the national supervisory authority associated with that jurisdiction.

Jurisdiction	Overarching Regulation	National Supervisory Authorities
Republic of Ireland	EU GDPR Data Protection Act 2018	<u>The Data Protection Commission (“DPC”)</u>
United Kingdom	UK GDPR Data Protection Act 2018	<u>The Information Commissioner’s Office (“ICO”)</u>
Greece	EU GDPR The Greek Law 4624/2019	<u>The Hellenic Data Protection Authority</u>
Iberia	EU GDPR Spanish Data Protection Act 201 Law no. 58/2019 of 8 August (Portugal)	Spain: <u>The Spanish Data Protection Agency (“AEPD”)</u> Portugal: <u>The Portuguese Data Protection Authority (“CNPD”)</u>
Italy	EU GDPR	<u>The Garante per la protezione dei dati personali (the “Garante”)</u>

Jurisdiction	Overarching Regulation	National Supervisory Authorities
	The Privacy Code 2003	
Australia	The Privacy Act 1988 The Australian Privacy Principles (APPs)	<u>The Office of the Australian Information Commissioner (“OAIC”)</u>
Canada	PIPEDA The Privacy Act	<u>The Office of the Privacy Commissioner of Canada</u>