



Prudential Employee Privacy Notice (August 2022)

Your Prudential employing company has prepared this Employee Privacy Notice ("Notice") to be provided to its employees. We need to process your personal data when we employ you. The purpose of this Notice is to give you information about how Prudential processes information about you, and your rights in relation to information.

Prudential needs to process your personal data in order 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 have to comply with in relation to your employment as well as business and operational needs we have to meet. If we are unable to carry out the processing activities we describe in this Notice, we will not be able to comply with your contract of employment, and in very exceptional cases, may not be able to continue your employment. Of course, we would never come to that, and this is simply information we are obliged to provide to you as part of this Notice.

In certain limited circumstances we may need to ask for your explicit consent to process your personal data in a particular way. Where we do so, you will be entitled to withdraw your consent at any time by contacting us. However, in most cases we will process it for the reasons set out in this Notice and it won't be appropriate or necessary for you to provide consent.

When we say "Prudential", "we" or "us" in this document, we mean your employing company within the Prudential Group. This is the entity with which you have an employment contract. Prudential Group refers to all Prudential entities globally under Prudential. Details of these can be requested by contacting us as stated below. Who can I contact about this? As with many other Prudential policies, this document is not part of your contract of employment, and we may update it from time to time, for example if we require your personal data.



time, and systems / buildings access monitoring information such as CCTV images, building card access, internet, work email and telephone usage data;

business travelling information, such as date and time of travel, flight information, hotel accommodation;

performance, development and disciplinary information, such as performance reviews and ratings, information about disciplinary allegations, the disciplinary process and any disciplinary warnings, details of grievances and any outcome;

absence information, such as dates of absence, holiday, maternity leave, paternity leave, adoption leave, shared parental leave, compassionate leave, confirmation of a birth of a child, leave, family care leave, medical leave; and

personal views and opinions related to your employment, such as views expressed and minuted in meetings

organisational data including employee number for IT systems, company details, cost centre allocations, and organisations

next of kin and family information including emergency contact details, certain relationship identification data, your marital status, information about your dependents and their stocks/shares holding

We'll collect personal information from the following general sources:

from you directly;

information generated by our systems, such as:

cd22f a i 0 3 8 (d) 0 4 8 2

disciplinary information; absence information; organisational data; and recruitment for other roles b



Both Employee Data and Sensitive Employee Data are needed by Prudential to carry out a variety of activities that are linked to your employment and Prudential's compliance with its obligations as a result of employing you as a business.

Depending on your country of location, we are required to explain to you the legal bases for our collecting, processing and use of your Employee Data and Sensitive Employee Data. We have summarised these below:

For Employee Data, our legal bases are:

performance of the contract of employment with you; compliance with legal obligations, in particular in the area of labour and employment law, social security and protection law, data protection law, tax and corporate compliance laws; the legitimate interests of Prudential, Prudential affiliates or other parties (such as existing or potential business partners, suppliers, customers and governmental bodies or courts); your consent, where that is appropriate, meets the requirements of applicable data protection law and has been separately obtained; protection of vital interests of you or another individual; performance of a task carried out in the public interest or in the official authority vested in Prudential.

For Sensitive Employee Data, our legal bases are:

explicit consent as allowed by applicable protection law to carry out the obligations and to exercise the specific rights of Prudential in your field of employment and social security and social protection law as permitted by applicable data protection law and/or a collective agreement; to protect the vital interests of you or of another individual where you are physically or legally giving consent; public data as made public manifestly by you; to establish, exercise or defend a legal claim where courts are acting in their judicial capacity; for substantial public interest as permitted by applicable protection law for assessment of the working capacity of the employee as permitted by applicable protection law.

We appreciate that there is a lot of information there, and we want to be as clear with you as possible. Where we talk about legitimate interests of Prudential or third parties, this can include:

- Implementation and operation of a Group organisational structure and Group information sharing;
- Right to freedom of expression and information.



Within the Prudential Group. As your employing company part of a wider Group that has headquarters in the UK and Hong Kong SAR with offices located across the globe, Prudential may transfer Employee Data and Sensitive Employee Data to, or otherwise allow access to such data by other entities within the Prudential Group, which may use, transfer, and process the data for the following purposes: to maintain and improve the effective administration of the workforce; to communicate information about the Prudential Group; to maintain a corporate directory; to maintain IT systems; to monitor and assure compliance with applicable policies and procedures, and applicable laws; and to respond to requests and legal demands from regulators and other authorities.

Communication with third parties. As necessary in connection with business operations, work contact details and communication contact details may be transferred to existing or potential business partners, suppliers, customers, and other third parties.

Regulators, authorities, and other third parties. As necessary for the Processing Purposes described above, personal information may be transferred to regulators, courts, and other authorities (e.g. tax and enforcement authorities), independent external advisors (e.g. auditors), Directors within the Prudential Group, insurance providers, pensions and benefits providers, internal compliance and investigation teams (including external advisers appointed to conduct internal investigations).

Acquiring entities. If the Prudential business for which you work may be sold or transferred in whole (or such a sale or transfer is being contemplated), your personal data may be transferred to the new employer or potential new employer as part of the transfer itself or as part of an initial review for such transfer (due diligence), subject to any rights provided by applicable law, including jurisdictions where the new employer or potential new employer are located.

Data processors As necessary for the Processing Purposes described above, personal data may be shared with one or more third parties, whether affiliated or unaffiliated, to process personal information under appropriate instructions (Data Processors). The Data Processors may carry out instructions related to workforce administration, IT system support, payroll and compensation arrangements, training, compliance, and other activities, and will be subject to contractual obligations to implement appropriate technical and organisational security measures to safeguard the personal information, and to process the personal information only as instructed.

For a full list of the Prudential Group entities and third parties that we may share your data with, as set out below to request the Record of Processing.

As you may expect, some of the recipients we may share Employee Data and Sensitive Employee Data with may be located in countries outside of your location.

Some countries where recipients are located have already been assessed by your respective government and the privacy commissioner or authority ensuring an adequate level of protection for this data approved by the relevant authority for the transfer of personal data.

If recipients are located in other countries that are not deemed to provide adequate protections for personal data by your respective authority, Prudential will take all necessary measures to ensure that transfers are adequately protected as required by applicable data protection law. This may include, without limitation, entering into appropriate safeguards such as applicable model data protection clauses which your respective privacy commissioner or authority has assessed as providing an adequate level of protection for personal data. You may request a copy of the appropriate safeguards by contacting us as set out below ("Who to Contact").

How long will Prudential keep my personal information for?

It is our policy not to keep personal information for longer than is necessary. We may, for example, keep per



Prudential Where personal information is kept, that period will be determined based on the applicable local law. For further information regarding retention, please contact us as set out below.

What rights do I have in respect of my personal information?

Depending on the country of your location, you may have a number of rights in relation to your Employee Data and Sensitive Employee Data. There are exceptions and limitations to these rights, and the rights can be summarised in broad terms as follows:

(i) **Right of access**

You have the right to confirm or deny whether your personal data is processed, and if it is, to request access to that personal data including the categories of personal data processed, the purpose of the processing and the recipients or categories of recipients. We do have to take into account the interests of others, though, so this is not an absolute right, and if you want to request more than one copy we may charge a fee.

(ii) **Right to rectification**

You may have the right to rectify inaccurate or incomplete personal data concerning you.

(iii) **Right to erasure (right to be forgotten)**

You may have the right to ask us to erase personal data concerning you, if it is no longer needed for the Processing Purposes and there is no other legal basis for the processing.

(iv) **Right to restriction of processing**

In limited circumstances, you may have the right to request that we restrict processing of your personal data, however where we process Employee Data and Sensitive Employee Data for the Processing Purposes, we think that we have a legitimate interest in processing that day which may override a request that you make.

(v) **Right to data portability**

You may have the right to receive personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you may have the right to transmit that data to another entity.

(vi) **Right to object and rights relating to automated decision making**

Under certain circumstances you may have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data, including profiling, by us and we are required to no longer process your personal data. This may include requesting human intervention in relation to an automated decision so that you can express your view and to contest the decision.

To confirm the rights which apply to you or exercise any of these rights, please contact us as stated below. Can I contact about this?

Why does Prudential need my next of kin and family information?

We need the personal data of your next of kin for emergency contact reasons; and of your family members in order to provide benefits. We also need family information for compliance with certain (I)-3.9 (8 (i)-yuf)2.8 (



Who can I contact about this?

If you have concerns or questions regarding this Notice, the rights specific to your country of location, if you would like to exercise your rights as a data subject, contact your local data privacy team or Group Privacy team

Group Privacy 4th floor, 1 Angel Court, London, EC2R 7AG 3/F One IFC, 1 Harbour View Street, Central, Hong Kong SAR

GHO.dataprotection@prudential.com

Depending on your country of location, you may have the right to lodge a complaint with the competent data protection supervisory authority in your own country.