



Vodafone Group Services Limited Employee Privacy Statement

Policy Standards Supported / Objective		
<p>The objective of this statement is to explain how Vodafone collects, use, shares and protects your personal information.</p> <p>This document supports the Privacy Risk Management Standard and the following principles:</p> <ul style="list-style-type: none"> • Vodafone is committed to process personal information honestly, ethically, with integrity, and always consistent to applicable law and our values • Vodafone is transparent with our employees about the personal information we collect, use, share and store about them • Vodafone employees understand how Vodafone collects and processes their personal information and their rights with respect to this personal information. 	Owner	Bernd Flossbach
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	Version	Version 1.8

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1 Our Privacy Promise

Employees entrust us with their privacy – whether it is the protection of their personal information, the confidentiality of their private communications or the way we develop our products and services. The way we handle their privacy is a vital part of our responsibility to employees and how we earn their trust. We aim to create a culture where everyone at Vodafone has a clear understanding of how important privacy is to our employees and how to ensure it is respected. Our Privacy Promise sets out the principles that govern our approach to privacy and how we communicate with employees, partners and other stakeholders on relevant issues – such as designing products to protect privacy or assisting with law enforcement.

Vodafone's privacy principles are:

How we operate

- **Accountability:** we are accountable for living up to these principles throughout our corporate family, including when working with our partners and suppliers. We have in place accountable privacy compliance measures and we monitor and enforce our compliance with these principles.
- **Fairness and lawfulness:** we comply with privacy laws and act with integrity and fairness. We will work with governments, regulators, policy makers and opinion formers for better and more meaningful privacy laws and standards.
- **Openness and Honesty:** we communicate clearly about actions we take that may impact privacy, we ensure our actions reflect our words, and we are open to feedback about our actions
- **Choice and access:** we give people the ability to make simple and meaningful choices about their privacy and allow individuals, where appropriate, to access, update or delete their personal information.

How we manage and protect personal information

- **Responsible Data Management and limited disclosures:** we apply appropriate data management practices to govern the processing of personal information. We choose the partners who participate in processing of personal information carefully and we limit disclosures of personal information to such partners to what is described in our privacy statement or to what has been authorized by our employees.
- **Security safeguards:** we implement appropriate technical and organisational measures to protect personal information against unauthorized access, use, modification or loss.

How we design our products and services

- **Privacy by Design:** respect for privacy is a key component in the design, development and delivery of our products and services.

How we make decisions

- **Balance:** when we are required to balance the right to privacy against other obligations necessary to a free and secure society, we work to minimize privacy impacts.

2 Who we are

Vodafone Group Services Limited are the controller of your personal information. We are a member of the Vodafone Group and manage HR operations, including the processing of personal information about Vodafone Group Services Limited employees.

Our registered office is Vodafone House, The Connection Newbury, Berkshire RG14 2FN. We are registered in England under company number 03802001. We are also registered with the Information Commissioner's



Office (ICO), registration number Z802136X. We provide details of how to contact us in section 8 'Specific information for your country' of this privacy statement.

3 Definitions

In this privacy statement:

“we/us” means Vodafone Group Services Limited,

“Third party” means someone who is not you or us or a part of Vodafone Group; and

“Vodafone” or “Vodafone Group” means Vodafone Group Plc and any company or other organisation in which Vodafone Group Plc owns 50% or above of the share capital.

4 The Basics

4.1 Personal information we collect about you

4.1.1 Vodafone will process your personal information based on

1. **The performance of your employment contract with Vodafone** and to take action on your requests, including for example, leave requests or providing you with the correct pay; or
2. **Vodafone’s legitimate business interest**, including for example, fraud prevention, maintaining the security of our systems, investigations relating to compliance with our policies or laws, to defend our lawful interests in legal proceedings, meeting our targets for diversity, organisational planning and effectiveness and improving our services and workplace for employees; or
3. **Compliance with a mandatory legal obligation**, subject to strict internal policies and procedures which control the scope of legal assistance to be provided; or
4. **Consent you provide**, where Vodafone does not rely on another legal basis or in addition to performance of contract or reliance on our legitimate business interests, you choose to provide us with your personal information and the processing of that information is voluntary including for example, when you take part in events organised by Vodafone. Your consent can be withdrawn at any time.

4.1.2 How we collect information about you

We collect personal information about you when you apply for a job at Vodafone and subsequently as we prepare for you to start your employment with us. Some of the information we collect about you is required by law, for the provision of your employment contract, and to fulfil the obligations within that contract – we will make this clear at the point where we collect the information. If you do not provide this information then we will not be able to create a contract of employment or we will not be able to fulfil our obligations under that contract e.g. paying your salary, approving leave request. Other personal information we collect is subsequently generated during the course of your employment by our internal processes and applications.

We may collect personal information about you from external sources including third party service providers whom we have engaged to provide specific services to you, and to whom you have agreed to share your personal information with us. For example, third parties who process our pensions, share incentive schemes, company car hire or business travel bookings. . We may also collect personal information about you where the information has been made publicly available.

4.1.3 The types of personal information we may collect about you are, for example:

- a) **Personal details**, such as name, date of birth, address, personal email address, telephone number, emergency contact details, proof of identity;



- b) **Employment information**, means job related information such as employee number, contract of employment, amendments to terms and conditions, letter of resignation, record of service, annual leave forms, company email address, company mobile number, job title, job description;
- c) **Recruitment information**, such as your application, CV, interview notes, references from previous employers, internal references;
- d) **Salary and Payment information**, such as social security number, record of pay, payments for travel allowances (e.g. car share), bank details, tax reference details, expenses claims and payments, pension records;
- e) **Performance and Talent information**, such as training, training evaluation records, qualifications, personal development reviews, performance & talent rating, evidence from investigations, records of disciplinary actions;
- f) **General HR administration information**, such as general correspondence with HR, redundancy records, records of complaints and grievances;
- g) **Employee authentication information**, such as your Vodafone username and password needed to log in to the Vodafone network;
- h) **Your use of work devices and corporate networks**, services, systems, networks, accounts and corporate communications.
- i) **Security in the workplace**, such as onsite CCTV footage and access card records;
- j) **Cookies**, on certain internal HR pages and Vodafone intranet.

We may also collect sensitive personal information about you – but only where this is strictly necessary to perform our legal obligations as an employer or when this information is provided on a voluntary basis. For example:

- a) we may collect information about your racial or ethnic origin to evaluate our compliance with the requirements set by equal employment legislation;
- b) we may collect information about your health, such as sickness records, medical certificates, in order provide sick pay or maternity cover and to perform our health & safety obligations as an employer;
- c) we may collect records of criminal convictions for security background checks at the recruitment stage;
- d) we may collect information about your sexual orientation to create anonymous and aggregated reports – but only where you provide this information voluntarily and we have collected your consent to process information for these purposes.

4.2 How we use information about you

We may process the personal information that we collect about you for the following purposes:

- a) **Meeting our legal obligations as an employer**, such as providing government agencies with your employment information and managing our tax responsibilities. For example, we will provide your tax information to the government agencies;
- b) **Meeting our contractual obligations as your employer**, such as managing your employment contract. For example: we must include your name, date of birth and other information in the employment contract you enter with us;
- c) **Resourcing**, such as recruiting people internally, onboarding people into Vodafone, managing international mobility. For example, during onboarding we collect your personal email address so we can correspond with you during the recruitment process;



- d) **Learning and development**, such as identifying learning requirements, managing learning solutions, delivering learning. For example, Vodafone University may use your profile to recommend training courses;
- e) **Rewards and Recognition**, such as performing annual reward review, managing recognition and reward, managing global shares schemes. For example, we use information about your pay to generate your end of year reward statement;
- f) **Communication & Involvement**, such as conducting surveys amongst employees, letting you know about important business change. For example, we may conduct surveys with our employees to collect insights on a specific topic like diversity and inclusion;
- g) **Maintain employee health, safety and wellbeing**, such as managing employee safety and wellbeing incidents, monitoring employee wellbeing, conducting employee safety and wellbeing audit. For example: using information about incidents to register workplace incidents;
- h) **Organisation Effectiveness & Change**, such as internal reporting or analysis to support business and cultural change or reviewing organisational effectiveness. For example, we may use your workplace location and access card records to understand the impact on desk capacity in our sites;
- i) **Information security and investigations**, please see [4.2.1 Monitoring and assuring compliance with Vodafone policies](#) below for more information;
- j) **Monitor compliance with Vodafone policies**, please see [4.2.1 Monitoring and assuring compliance with Vodafone policies](#) below for more information;
- k) **Operational & administration**, such as managing requests and changes to your information during your employment lifecycle including payroll, recording time and attendance, travel and expenses, user access management, Office IT and resolving issues and requests raised to HR services;
- l) **Performance and talent management**, such as managing employee performance aligned to business goals, review employee potential, identify and review development of talent, management of resource. For example, we believe in "pay for performance" and to continue to differentiate our reward based on performance and potential;
- m) **Defend Vodafone's lawful interests**, for example in legal or investigatory proceedings in accordance with applicable laws.

4.2.1 Monitoring and assuring compliance with Vodafone policies

In order to ensure Vodafone is compliant with its internal policies, we may process your employee personal information for the purposes of monitoring your compliance with internal Vodafone policies such as collecting your personal information on our Gifts & Hospitality register in order to comply with our Anti-bribery policy. You will find these policies on the [Global Policy Portal](#). This information may be processed in the course of an investigation into such a matter.

In order to protect the confidentiality, integrity and availability of Vodafone's business information, personal information and our IT and other systems, we monitor, to the extent allowed by applicable laws, your use of:

- Vodafone owned equipment (for example your company laptop, tablet and phone);
- User owned devices (for example devices that are owned by a Vodafone employee and that are used to access Vodafone's systems and to access, process, store and transmit Vodafone's corporate data);
- Corporate networks and IT (for example your access to document management systems, your use of internal networks, tools, applications and your online browsing); and



- Corporate communications accounts (for example your messages sent via Outlook, Yammer, Skype for Business – this can include, in certain circumstances, viewing the content of your messages).

Please note: information will only be processed for this purpose when it is moved or sent in breach of Vodafone's **Information Security Policy** and subject to applicable national laws, even when you are not connected to the corporate VPN. You will find this policy on the Global Policy Portal.

For example, we routinely scan our employees' use of our corporate network and corporate communications accounts to detect threats such as computer viruses, attempts to access suspicious third party websites, unauthorised access attempts and internal misuse (such as a breach of our information security policy).

Similarly, software in your work device monitors the flow of information leaving your device and would alert internal security teams about a breach of policy as soon as your device reconnected to the corporate VPN.

We encourage you to read our **Acceptable Usage Guidance**, which explains how to use your Vodafone owned equipment, and user owned devices, networks and communications accounts in compliance with internal company policy. You can also find more about our information security practices in our **Information Security Policy**. You can find these security policies on the Global Policy Portal.

In some circumstances (for example if an internal investigation is opened, or Vodafone is subject to disclosure/discovery procedures as part of a regulatory investigation or legal proceedings) we may:

- remotely monitor your usage of our work devices, networks and communications accounts as outlined above – in more detail;
- require you to hand in your work device to be forensically analysed (**Please note:** if you store personal information, such as photos, documents or apps, onto the hardware of your work device these could be accessed by an investigator in the course of conducting their forensic analysis); or
- review your travel expenses to check for fraudulent expense claims or claims that are in breach of internal company policy, please see our **Expenses Policy** on the Global Policy Portal for more information;
- Other means deemed necessary to conclude an investigation subject to Vodafone's legitimate interests and applicable national law.

Information gathered from such investigations could be used in subsequent disciplinary or legal proceedings. For more information, please read our **Investigation Policy** on the Global Policy Portal.

For clarity, we do not, under any circumstances, routinely monitor your usage of work devices when you are:

- Using your work phone or tablet outside of work apps (for example, when you use your work phone to download and use apps like Facebook, Netflix, MyVodafone and Amazon or to take photos); or
- Saving personal information, such as photos, documents or apps, onto personal use cloud accounts (e.g. Google Docs, Dropbox or Facebook) from your work device (but our forensic investigators do potentially have access to personal information you save to the hard drive of your work device).

4.2.2 Analytics and automated decision-making

We may process the personal information that we collect about you to do analytics for the purposes identified in section **4.2 How we use information about you**. By way of brief summary:



- Many use cases will solely generate **anonymous, aggregate insights** which do not identify you personally;
- However, some use cases may involve **profiling** which means evaluation, analysis or prediction of aspects concerning you and your performance at work including, for example, for the purposes of talent management, succession planning or fraud prevention.

We do not use analytics for **automated decision-making** (that is, decision making with no human involvement) which would produce legal effects or other similar significant impacts on you. Rather the insights generated by the analytics are used to provide additional insights and data points to inform our activities, for example, relating to reporting or business planning. You may learn about our analytics activities through your local Privacy Officer. Their contact details are available under section 8 '[Specific information for your country](#)'.

4.3 Who we share information about you with

We may share personal information about you with:

- Other companies in the Vodafone Group subject to inter-company agreements or arrangements;
- Companies or consultants who are engaged to perform services for, or on behalf of Vodafone Group including for example, those who process our pension and share incentive schemes, company car hire or business travel bookings or other companies on the Vodafone Group;
- Law enforcement agencies, government bodies, regulatory organisations, courts or other public authorities if we have to, or are authorised to by law;
- A third party or body where such disclosure is required to satisfy any applicable law, or other legal or regulatory requirement;
- Other third parties when we have your consent to so (for example providing a personal reference to a bank, building society, landlord or property agent);
- In conjunction with any TUPE transfer or merger, sale or acquisition of a company in the Vodafone Group.

4.4 Where we process information about you

In doing the above, we may need to transfer personal information about you to other companies in the Vodafone Group or third parties located (or whose servers may be located) in countries outside of where you are employed, including countries outside of the European Economic Area (EEA). If we send personal information about you to a country that is not in the EEA, we will make sure that there is a legal basis for such transfer and that your personal information is adequately protected as required by applicable law, for example, by using standard agreements approved by relevant authorities and by requiring the use of other appropriate technical and organizational measures to protect your personal information.

Please contact your local Privacy Officer if you would like to find out more about the way we comply with our legal obligations in relation to international data transfers. Their contact details are available under section 8 '[Specific information for your country](#)'.

4.5 How long we keep information about you

We'll store your information for as long as is required by law. If there is no legal requirement, we will only store it for as long as is necessary for the purposes of processing. Generally, this means that we will retain your information for as long as you are employed by Vodafone, and after you leave, we retain some of that information for as long as is necessary to fulfil the purposes for which it was collected as prescribed by the law. For example, after you leave Vodafone, we will keep your information for the relevant limitation period in which you could bring a claim against Vodafone. In the UK, the limitation period is generally 8 years, unless we have received a court or investigatory order to preserve evidence, in which case we may store some data sets (those that are in scope of such an order) for longer.



4.6 How we protect your personal information

Vodafone is committed to protecting your personal information. We apply strong security and privacy measures to protect your personal information from unauthorised access, use, loss, disclosure or destruction. For example, we encrypt your personal information when it is transmitted, and we store it in a controlled environment with limited access. Our dedicated security and privacy teams conduct assessments on our products, services and operations to ensure our privacy and security policies are implemented. Our suppliers and others who process personal information on our behalf are expected to comply with our high standards. Vodafone employees and approved third parties who need access to personal information are subject to internal policies, strict confidentiality obligations and training. We monitor the implementation of these internal policies. Failure to comply with our policies may lead to investigation and possible disciplinary action. Vodafone complies with applicable data protection laws, including applicable data breach notification laws

5 Your rights

You may make a request to the data controller to exercise the following rights over your personal information:

- a) **Right to correct or update information:** you have the right to have the information we hold about you corrected if it is not accurate. If the information we hold about you needs updating, or you think it may be inaccurate, you can log in to your employee profile to update it;
- b) **Right to access:** want a copy of the personal information we process about you? You can request a copy of your personal information by contacting AskHRGroupUK@vodafone.com;
- c) **Right to object:** you have the right to object to the processing of your personal information where we rely on our legitimate ground to do so for example, for analytics and profiling use cases where you are identified personally (see section [4.2.2 Analytics and automated decision-making](#)). Your objection will be balanced against our specific legitimate ground for processing. You can request to object to processing by contacting AskHRGroupUK@vodafone.com;
- d) **Right to deletion:** in certain circumstances, you have the right to request that we erase the personal information we hold about you. You can request for your information to be deleted by contacting AskHRGroupUK@vodafone.com;
- e) **Right to restrict use of your information:** if you feel the personal information we hold about you is inaccurate or believe we shouldn't be processing your personal information, you may have the right to ask us to restrict processing that information. You can request to restrict processing by contacting AskHRGroupUK@vodafone.com;
- f) **Right to data portability:** in certain circumstances you will have the right to take the personal information you have provided to us with you. You can raise a request for data portability by contacting AskHRGroupUK@vodafone.com.

If we do not take action based on any of the above requests, we will inform you of the reasons why.

6 Changes to this Privacy Statement

This privacy statement is updated from time to time, so we would encourage you to check it regularly on your local policy portal. If we make a major change, we'll let you know by email.

7 How to contact us

If you have further questions about this privacy statement or how we process your information, please contact your local Privacy Officer. Their contact details are available in section 8 'Specific information for your country'. We will do our best to help but if you are still unhappy, you can contact the Information



Commissioner's Office (ICO) – specific details of which are contained in section 8 'Specific information for your country' in this privacy statement.

8 Specific information for your market

If you have any further questions about this privacy statement or how we process your information, please contact the Group Privacy Officer by email: ask.groupprivacy@vodafone.com

If you are unhappy about how we process your personal information, you can contact the Information Commissioner's Office (ICO), registration number Z802136X. Contact details can be found [here](#).

9 Document History

Last updated 20th June 2019

Vers.	Date	Changes	Approved by
1.5	01/03/2018	Version 1.5	Elisabetta Caldera
1.6	16/08/2018	Version 1.6	Elisabetta Caldera
1.7	29/11/2018	Version 1.7	Elisabetta Caldera
1.8	20/06/2019	Updates to section 4.1.2 Updates to section 4.2 Creation of section 4.6	Elisabetta Caldera



Vodafone Policy Detailed Requirements

UK Employee Privacy Statement

Policy Owner:	Policy Champion:	Version:	Date:
Clare Corkish	Lucy Wheeler	1.7	26/01/2021

Objective/Risk:

The objective of this statement is to explain how Vodafone collects, uses, shares and protects your personal information.

This document supports the Privacy Risk Management Standard and the following principles:

- Vodafone is committed to process personal information honestly, ethically, with integrity, and always consistent to applicable law and our values
- Vodafone is transparent with our employees about the personal information we collect, use, share and store about them
- Vodafone employees understand how Vodafone collects and processes their personal information and their rights with respect to this personal information.

Compliance levels are monitored and reviewed by appropriate governance bodies. Any breach will be treated as a serious disciplinary offence and may be subject to disciplinary action.

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1. Our Privacy promise

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Vodafone’s privacy principles are:

How we operate

- **Accountability:** we are accountable for living up to these principles throughout our corporate family, including when working with our partners and suppliers. We have in place accountable privacy compliance measures and we monitor and enforce our compliance with these principles.
- **Fairness and lawfulness:** we comply with privacy laws and act with integrity and fairness. We will work with governments, regulators, policy makers and opinion formers for better and more meaningful privacy laws and standards.
- **Openness and Honesty:** we communicate clearly about actions we take that may impact privacy, we ensure our actions reflect our words, and we are open to feedback about our actions.
- **Choice and access:** we give people the ability to make simple and meaningful choices about their privacy and allow individuals, where appropriate, to access, update or delete their personal information.

How we manage and protect personal information

- **Responsible Data Management and limited disclosures:** we apply appropriate data management practices to govern the processing of personal information. We choose the partners who participate in processing of personal information carefully and we limit disclosures of personal information to such partners to what is described in our privacy statement or to what has been authorised by our employees.
- **Security safeguards:** we implement appropriate technical and organisational measures to protect personal information against unauthorised access, use, modification or loss.

How we design our products and services

- **Privacy by Design:** respect for privacy is a key component in the design, development and delivery of our products and services.

How we make decisions

- **Balance:** when we are required to balance the right to privacy against other obligations necessary to a free and secure society, we work to minimise privacy impacts.



2. Who we are

Vodafone Limited is the controller of your personal information. We are a member of the Vodafone Group and manage HR operations, including the processing of personal information about Vodafone Limited employees.

Our registered office is Vodafone House, The Connection Newbury, Berkshire RG14 2FN. We are registered in England under company number 1471587. We are also registered with the Information Commissioner's Office (ICO), registration number Z1933885. We provide details of how to contact us in the [How to contact us](#) section of this privacy statement.

In some circumstances, Vodafone Group Services Limited (VGSL) controls the processing of your personal information jointly with us, in particular for the provision of Office-IT and related services and in any other circumstances where such a role has been defined in a privacy notice. The registered office of VGSL is Vodafone House, The Connection Newbury, Berkshire RG14 2FN. We are registered in England under company number 03802001. Unless otherwise specified in a separate privacy statement, the way your personal information is processed will remain compatible with the wording of this privacy statement. You may read the VGSL privacy statement on the Global Privacy Portal

3. Definitions

In this privacy statement:

“we/us” means Vodafone Limited

“third party” means someone who is not you or us or a part of Vodafone Group; and

“Vodafone” or “Vodafone Group” means Vodafone Group Plc and any company or other organisation in which Vodafone Group Plc owns 50% or above of the share capital

4. The Basics

4.1 Personal information we collect about you

4.1.1 Vodafone will process your personal information based on

1. **The performance of your employment contract with Vodafone** and to take action on your requests, including for example, leave requests or providing you with the correct pay; or
2. **Vodafone's legitimate business interest**, including for example, fraud prevention, to administer and manage your employment or engagement, maintaining the security of our systems, investigations relating to compliance with our policies or laws, to enable Vodafone to tender and bid for contracts and services, to submit compliant responses, and submissions for tenders and bids and to enter into and manage contracts with clients, suppliers and business customers, to defend our lawful interests in legal proceedings, meeting our targets for diversity, organisational planning and effectiveness and improving our services and workplace for employees; or
3. **Compliance with a mandatory legal obligation**, where certain information is necessary to satisfy a legal, contractual or regulatory requirement and where relevant subject to strict internal policies and procedures which control the scope of legal assistance to be provided; and
4. **Consent you provide**, where Vodafone does not rely on another legal basis or in addition to performance of contract or reliance on our legitimate business interests, you choose to provide us with your personal information and the processing of that information is voluntary including for example, if your medical information is provided for the purposes of an occupational health assessment. Your consent can be withdrawn at any time.



4.1.2 How we collect information about you

We collect personal information about you when you apply for a job at Vodafone and as we prepare for you to start your employment with us and subsequently, during your employment and in connection with the termination of your employment.

We may collect personal information about you from external sources including third parties and third party service providers including those whom we have engaged to provide specific services to you or where you have agreed that they can share your personal information with us. This includes but is not limited to recruitment consultants, employment agencies, previous employers, educational establishments, HMRC, the home office for immigration purposes (where necessary) and the Disclosure and Barring Service (where applicable), third parties who process our pensions, share incentive schemes, company car hire or business travel bookings. We may also collect personal information about you where the information has been made publicly available.

Some of the information we collect about you is required by law, for the provision of your employment contract, and to fulfil the obligations within those contracts – we will make this clear at the point where we collect the information. If you do not provide this information then we will not be able to create a contract of employment or we will not be able to fulfil our obligations under that contract e.g. paying your salary, approving leave request. Other personal information we collect is subsequently generated during the course of your employment including by our internal processes and applications.

4.1.3 The types of personal information we may collect about you are, for example:

- a) **Personal details**, such as name, date of birth, address, personal email address, emergency contact details (including name, relationship and home and mobile telephone numbers), proof of identity, details of your spouse/partner and any dependants;
- b) **Employment information**, means job related information such as employee number, contract of employment, CV, role information, amendments to terms and conditions, letter of resignation, record of service, sickness and absence records (including sensitive personal information – see below), annual leave forms, company email address, trade union membership, sex and sexual orientation, religious or similar beliefs, company mobile number, job title, job description, time and attendance records and applications for other roles within Vodafone;
- c) **Recruitment information**, such as your application, CV, interview notes, references from previous employers, internal references, nationality and immigration status, passport and other identification and immigration details, criminal records information including the results of initial and updated security and Disclosure and Barring Service (DBS) checks (where applicable);
- d) **Salary and Payment information**, such as social security number, record of pay, age, payments for travel allowances (e.g. car share), bank / building society details, tax reference details, expenses claims and payments, pension records, salary and benefits details such as details of any share, incentive or pension arrangements and the information included in these and necessary to implement and administer them;
- e) **Performance and Talent information**, such as training, training evaluation records, qualifications, personal development reviews, details of appraisals and performance management or improvement plans, performance and talent rating, video/call recordings and chat logs with customer evidence from investigations, records of disciplinary actions;
- f) **General HR administration information**, such as general correspondence with HR, benefits providers, GPs, occupational health, PHI insurers and administrators and professional advisers, redundancy records, records of complaints, disciplinary and grievance processes, conduct issues, as well as any ACAS early conciliation, personal injury and Employment Tribunal claim details;
- g) **Employee authentication information**, such as your Vodafone username and password needed to log in to the Vodafone network;



- h) **Your use of work devices and corporate networks**, services, IT systems, networks, accounts and corporate communications;
- i) **Security in the workplace and off site**, such as onsite CCTV footage, other security cameras and access card records;
- j) **Cookies**, on certain internal HR pages and Vodafone intranet;
- k) **Telematics information**, if a telematics device is installed in your company and/or commercial vehicle it will collect information about the way you drive, where you have been driving, or if you exceeded the speed limit;
- l) **Photos or video footage**, if you provide us photos or videos of yourself which may also include your spouse/partner and any dependants or where you can be identified in photos or videos taken by Vodafone or our partners and/or suppliers during events.

We may also collect sensitive personal information about you where necessary –as an employer or when this information is provided on a voluntary basis. For example:

- a) we may collect information about your racial or ethnic origin to evaluate our compliance with the requirements set by equal employment legislation and relevant codes of practice;
- b) we may collect information about your physical and mental health, such as attendance and sickness records, fit notes, occupational health and GP reports in order to provide sick pay or maternity cover, manage your absence, make reasonable adjustments for you, complete an occupational health, GP or PHI referral and to perform our health and safety obligations as an employer;
- c) we may collect records of criminal convictions through a DBS check and other necessary security background checks (where applicable) on recruitment and during employment;
- d) we may collect information about your sexual orientation to create anonymous and aggregated reports – but only where you provide this information voluntarily and we have collected your consent to process information for these purposes.

4.2 How we use information about you

We may process the personal information that we collect about you for the following purposes:

- a) **Meeting our contractual obligations as your employer**, such as managing your employment contract. For example: we must include your name, date of birth and other information in the employment contract you enter with us.
- b) **Meeting our legal and regulatory obligations as an employer**, such as providing government agencies with your employment information and managing our pay and tax responsibilities. For example, we will provide your tax information to the government agencies;
- c) **Resourcing**, such as recruiting people internally, on-boarding people into Vodafone, managing international mobility. For example, during on boarding we collect your personal email address so we can correspond with you during the recruitment process;
- d) **Learning and development**, such as identifying learning requirements, carrying out performance reviews and management, personal development reviews, managing learning solutions, and delivering training for example, Vodafone University may use your profile to recommend training courses;
- e) **Rewards and Recognition**, such as performing annual reward reviews, managing recognition and reward and providing and managing benefits including managing global shares schemes. For example, we use information about your pay to generate your end of year reward statement;
- f) **Communication & Involvement**, such as conducting surveys amongst employees, letting you know about important business change. For example, we may conduct surveys with our employees to collect insights on a specific topic like diversity and inclusion;



- g) **Maintain employee health, safety and wellbeing**, such as managing employee safety and wellbeing incidents, monitoring employee wellbeing, conducting employee safety and wellbeing audit. For example: using information about incidents to register workplace incidents or contacting your emergency contact in the event of an emergency.;
- h) **Organisation Effectiveness & Change**, such as internal reporting or analysis to support business and cultural change or reviewing organisational effectiveness. For example, we may use your workplace location and access card records to understand the impact on desk capacity in our sites;
- i) **Information security and investigations**, please see [4.2.1 Monitoring and assuring compliance with Vodafone policies](#) below for more information;
- j) **Monitor compliance with Vodafone policies and procedures**, please see [4.2.1 Monitoring and assuring compliance with Vodafone policies](#) below for more information;
- k) **Operational and administration**, such as managing all changes to HR information within your employment lifecycle including leave, termination, recording time and attendance, expenses, office IT, investigating and managing incidents involving employees and disciplinary and grievances procedures, providing and managing benefits and payroll and resolving issues and requests raised to our HR services. This will include visibility of personal information you enter onto Vodafone HR systems such as your emergency contact details and details of dependants, which may be viewed by Vodafone's HR functions, including but not limited to the HR Business Partner responsible for your business area or by your line manager under certain circumstances;
- l) **Performance and talent management**, such as managing employee performance aligned to business goals, review employee potential, identify and review development of talent, management of resource. For example, we believe in "pay for performance" and to continue to differentiate our reward based on performance and potential;
- m) **Promoting Vodafone or Vodafone's products and services**, for example Vodafone media relations activity, print publications, online publications, presentations, websites and social media;
- n) **Bids and tenders and meeting our contractual obligations with current and prospective clients, landlords, partners, external suppliers and business customers**, such as providing your personal data to a current or prospective business customer. For example: some responses to tenders and bids for contracts and services require us include CVs for particular employees and roles and some business customer contracts require us to provide your personal details and/or employment, DBS check and other security background check outcomes and recruitment information to the business customer (for example, to enable security accreditation to be obtained or to enable customer or landlord site access).
- o) **Defend Vodafone's lawful interests**, for example in legal and/or regulatory proceedings in accordance with applicable laws;

4.2.1 Monitoring and assuring compliance to Vodafone policies and procedures

In order to protect Vodafone's equipment, property and business information, as well as the integrity of our assets and IT systems, we monitor your use of our equipment, property, assets, devices, networks and accounts in accordance with company and commercial vehicle policies and [Access to Employee Communications and Data Policy](#) including

- Vodafone owned equipment (for example your company laptop, tablet and phone);
- Vodafone owned and/or supplied vehicles;
- User owned devices (for example devices that are owned by a Vodafone employee and that are used to access Vodafone's systems and to access, process, store and transmit Vodafone's corporate data);
- Corporate networks (for example your access to document management systems, your use of internal networks and your online browsing); and



- Corporate communications accounts (for example your messages sent via Outlook, Yammer, Skype for Business – this can include, in certain circumstances, viewing the content of your messages).

Please note: information will only be captured or viewed in accordance with applicable policies and the Access to Employee Communications and Data Policy including but not limited to when information is moved or sent in breach of Vodafone's [Information Security Policy](#), even when you are not connected to the VPN, and subject to applicable national laws. You will find this policy on the [Global Policy Portal](#).

For example, we routinely scan our employees' use of our corporate network and corporate communications accounts to detect threats such as computer viruses, attempts to access suspicious third party websites, unauthorised access attempts and internal misuse (such as a breach of our information security and social media and instant messaging policy). Similarly, software in your work device monitors the flow of information leaving your device and would alert a breach as soon as your device reconnected to the VPN.

We encourage you to read our policies and [Acceptable Usage Guidance](#) which explains how to use your Vodafone owned equipment, property and user owned devices, networks and communications accounts in compliance with internal company policy.

In some circumstances (for example if an internal investigation is opened, or Vodafone is subject to disclosure/discovery procedures as part of a regulatory investigation or legal proceedings) we may:

- remotely monitor your usage of our equipment, property, work devices, networks and communications accounts as outline above – in more detail;
- require you to hand in your work device to be forensically analysed (**Please note:** that if you store personal information, such as photos, documents or apps, onto the hardware of your work device these could be accessed by an investigator in the course of conducting their forensic search); or
- review your travel expenses to check for fraudulent expense claims or claims that are in breach of internal company policy, please see our [Expenses Policy](#) on the [Global Policy Portal](#) for more information;
- other means deemed necessary to conduct and conclude an investigation subject to Vodafone's legitimate interests and applicable national law.

Information gathered from such investigations could be used in subsequent disciplinary, grievance or legal proceedings. For more information please read our Disciplinary and Grievance Policies and the [Investigation Policy](#) on the [Global Policy Portal](#).

For clarity, other than in exceptional circumstances (see next paragraph below), we do not, monitor your usage of work devices when you are:

- Using your work phone or tablet outside of work apps (for example, when you use your work phone to download and use apps like Facebook, Netflix, MyVodafone and Amazon or to take photos); or
- Saving personal information, such as photos, documents or apps, onto personal use cloud accounts (e.g. Google Docs, Dropbox or Facebook) from your work device (but our forensic investigators do potentially have access to personal information you save to the hard drive of your work device).

In exceptional cases, we may monitor your usage of work devices in these contexts but only on condition that it is in accordance with applicable law and the Privacy Officer has signed off on the specific investigation. An exceptional case would be when we are investigating an allegation of serious misconduct – provided that there is reasonable suspicion that this has taken place. For example, two employees allege sexual harassment by a colleague who sent them explicit messages via a personal messaging account.

We refer you to our Social Media and Access to Employee Communications and Data Policies for more information.

For further information, please see section 8 'Specific information for your country' in this privacy statement



4.2.2 Analytics and automated decision making

We may process the personal information that we collect about you to do analytics for the purposes identified in section 4.2 of this statement. By way of brief summary:

- Many use cases will solely generate **anonymous, aggregate insights** which do not identify you personally;
- However, some use cases may involve **profiling** which means evaluation, analysis or prediction of aspects concerning you and your performance at work, including for example for the purposes of talent management, succession planning or fraud prevention.

We do not use analytics for **automated decision-making** (that is, decision making with no human involvement) which would produce legal effects or other similar significant impacts on you. Rather the insights generated by the analytics are used to provide additional insights and data points to inform our activities, for example, relating to reporting or business planning. You may learn about our analytics activities through your local Privacy Officer. Their contact details are available under section 8 'Specific information for your country'.

4.3 Who we share information about you with

We may share personal information about you with:

- Vodafone Group Services Limited where they may be a joint data controller;
- Other companies in the Vodafone Group;
- Companies or consultants who are engaged to perform services for, to, or on behalf of Vodafone Group or a company in the Vodafone Group, including for example, those who process our pension, benefits, discount and share incentive schemes or manage our premises, company car hire, commercial and other vehicles or business travel bookings;
- Current and prospective clients and business customers, landlords, partners and external suppliers of Vodafone Group or any company in the Vodafone Group in accordance with our or our current or prospective clients, business customer, landlord, partner or suppliers' legitimate interests and our contractual, legal or regulatory obligations or other legal basis;
- Law enforcement agencies, government bodies, regulatory organisations, courts or other public authorities if we have to, or are authorised to by law;
- A third party or body where such disclosure is required to satisfy any applicable law, or other legal, contractual or regulatory requirement;
- Other third parties in accordance with our or the third parties legitimate interests, other legal basis or when we have your consent to so (for example providing a personal reference to a bank, building society, landlord or property agent);
- In conjunction with any TUPE transfer or merger, sale or acquisition of a company in the Vodafone Group.

4.4 Where we process information about you

In doing the above, we may need to transfer personal information about you to other companies in the Vodafone Group or third parties located (or whose servers may be located) in countries outside of where you are employed, including countries outside of the European Economic Area (EEA). If we send personal information about you to a country that is not in the EEA, we will make sure that there is a legal basis for such transfer and that your personal information is adequately protected as required by applicable law, for example, by using standard agreements approved by relevant authorities and by requiring the use of other appropriate technical and organizational measures to protect your personal information.

Please contact your Privacy Officer if you would like to find out more about the way we comply with our legal obligations in relation to international data transfers. Their contact details are available under section 8 'Specific information for your country'.

4.5 How long we keep information about you

We'll store your information for as long as we have to by law in accordance with our Data Retention Policy. If there's no legal requirement, we'll only store it for as long as we need to. Generally, this means that we will retain your



information for as long as you are employed by Vodafone, and after you leave we retain some of that information for long as is necessary to fulfil the purposes for which it was collected as prescribed by the law. For example, after you leave Vodafone, we will keep your information for the relevant limitation period in which you could bring a claim against Vodafone. For more information see section 8 for a link to our data retention policy

4.6 How we protect your personal information

Vodafone is committed to protecting your personal information. We apply strong security and privacy measures to protect your personal information from unauthorised access, use, loss, disclosure or destruction. For example, we encrypt your personal information when it is transmitted, and we store it in a controlled environment with limited access. Our dedicated security and privacy teams conduct assessments on our products, services and operations to ensure our privacy and security policies are implemented. Our suppliers and others who process personal information on our behalf are expected to comply with our high standards. Vodafone employees and approved third parties who need access to personal information are subject to internal policies, strict confidentiality obligations and training. We monitor the implementation of these internal policies. Failure to comply with our policies may lead to investigation and possible disciplinary action up to and including summary dismissal Vodafone complies with applicable data protection laws, including applicable data breach notification laws.

5. Your Rights

- a) As a Vodafone employee you can exercise the following rights over how Vodafone control and use your personal data:
Please read the information available on the MyHR [Data Privacy](#) page which outlines which information you already have access to through success factors or how to make a further request to HR through the self-serve portal or Tobi.
Right to correct or update information: you have the right to have the information we hold about you corrected if it is not accurate. If the information we hold about you needs updating, or you think it may be inaccurate, you can log in to your employee profile on Success Factors to update it;
- b) **Right to access:** you already have access to your personal information such as your address, bank detail, family members/dependents, through My HR, your payslips and myChoices, etc. If any of your personal data is not accessible through self-service tools, you have the right to make Subject Access Request (SAR). Please refer to myHR 'Data Privacy' [page](#) for details on how to do this;
- c) **Right to object:** you have the right to object to the processing of your personal information where we rely on our legitimate ground to do so for example, for analytics and profiling use cases where you are identified personally (see section 4.2.2). Your objection will be balanced against our specific legitimate ground for processing. Please refer to myHR 'Data Privacy' page for details on how to do this;
- d) **Right to deletion:** in certain circumstances you have the right to request that we erase the personal information we hold about you. Please refer to myHR 'Data Privacy' page for details on how to do this;]
- e) **Right to restrict use of your information:** if you feel the personal information we hold about you is inaccurate or believe we shouldn't be processing your personal information, you may have the right to ask us to restrict processing that information. Please refer to myHR 'Data Privacy' page for details on how to do this;
- f) **Right to data portability:** in certain circumstances you will have the right to take the personal information you have provided to us with you. Please refer to myHR 'Data Privacy' page for details on how to do this.

If we don't take action based on any of the above requests, we will inform you of the reasons why. You may exercise the same rights over your personal information controlled by Vodafone Group Services Limited by emailing AskHRGroupUK@vodafone.com



6. Changes to this Privacy Statement

This privacy statement gets updated from time to time, so we'd encourage you to check it regularly. If we make a major change, we'll post this on the Data Privacy section on myHR.

7. How to contact us

If you have any further questions about this privacy statement or how we process your information, please contact your local Privacy Officer. Their contact details are available in section 8 'Specific information for your country'. We'll do our best to help but if you're still unhappy, you can contact the Information Commissioner's Office – specific details of which are contained in section 8 'Specific information for your country' in this privacy statement.

8. Specific information for your market

Vodafone UK's Privacy Officer can be contacted by emailing ask.ukprivacy@vodafone.com.

Contact details for The Information Commissioner's Office can be found [here](#).

Link to;

[Access to Employee Communications and Data Policy](#)

[Information Security Policy](#)

[Social Media and Instant Messaging Policy](#)

[Data Retention Policy](#)

[Vodafone UK HR Data Retention Policy](#)

[Commercial Vehicle Policy](#)

9. Document history

Version	Date	Changes	Approved by
1.0	23/05/2018	Creation of Document	Lucy Wheeler / Pamela Tatlock
1.1	28/08/2018	<ul style="list-style-type: none"> Inserted new purpose for processing: 4.2 (h) Monitor compliance with Vodafone policies Renamed 4.3.1 from 'Monitoring your use of devices, networks and accounts' to 4.2.1 'Monitoring and assuring compliance to Vodafone policies' Update to policy champion and transfer to new template 	Terry Evetts
1.2	28/11/2018	<ul style="list-style-type: none"> Updated parts from Vodafone Limited to VGSL 	Kate O'Leary
1.3	15/04/2019	<ul style="list-style-type: none"> Updated 4.1.1, 4.2.m), 4.3 to cover the data collected and shared as part of the bids and tenders process. 	Pamela Tatlock / Alice Eccleston
1.4	20/06/2019	<ul style="list-style-type: none"> Updated 4.1.2 to provide more information on third party data sources Minor changes to 4.2 'How we use your information' Addition of 4.6 'How we protect your personal information' 	Adam Parsons / Andrew Yorston



		<ul style="list-style-type: none">• Inserted link to Vodafone UK HR Data Retention Policy	
1.5	05/08/2019	<ul style="list-style-type: none">• Updated 5. a) 'Your Rights', deleted 'EVO' and added 'Employee Central'	Pamela Tatlock / Alice Eccleston
1.6	20/04/2020	<ul style="list-style-type: none">• Updated '4.1.3 The types of personal information we may collect about you', '4.2 How we use information about you' and '4.2.1 Monitoring and assuring compliance to Vodafone policies and procedures' to reflect the use of both Telematics and Photos/Videos	Lucy Wheeler / Clare Corkish
1.7	26/01/2021	<ul style="list-style-type: none">• Updated section 4.1.3(e) ' The types of personal information we may collect about you' to include video/call recordings and chat logs with customers.• Updated section 4.2 'How we use your information' to ensure the use of emergency contact details is adequately covered• Updated section 5 'Your Rights' to explain how to exercise individual rights	Lucy Wheeler / Clare Corkish