



JLR PERSONNEL PRIVACY NOTICE

JLR Privacy Notice (“Notice”) UK

Introduction

JLR (“we,” “our,” “us”) collects and retains certain information about you for employment purposes. We are committed to protecting and responsibly handling your information and have produced this Privacy Notice to explain how we collect, use, share, and keep it secure. **Please note, this Privacy Notice (where relevant) will apply also to contractors and agency personnel.**

Where we collect your information for a specific project or initiative, we may supplement the contents of this Privacy Notice with specific details about those data handling activities, e.g., if you take part in a JLR event or prize draw. Look out for notices associated with those specific activities.

Contact details: If you work in the UK or are an ISE from the UK, and would like to get in touch regarding how we process your data, please contact HR Direct by emailing hrdirect@jaguarlandrover.com

What information JLR holds about you and why.

Personally identifiable information (PII) is information that we hold about you where you could potentially be identified. Most of the information we hold will be provided directly by you or be generated by us as part of our employment relationship with you. For example:

- (a) Information provided by you when you enter into a contractual relationship with us as an employee, such as contact and family details, bank details, or any documentation to determine your eligibility to work for us.
- (b) Information provided or generated as part of your employment, such as performance, capability, conduct and training.
- (c) Information provided or generated as part of keeping you safe and secure, such as health related details, confidential statements or closed-circuit television (CCTV) footage.

Sensitive Personally Identifiable Information (SPII) is PII that is of a more sensitive nature in substance, such as health or ethnicity information. Such information is collected in limited circumstances and is strictly controlled.

Where your information is required for entering into a contract, we will identify to you where information is mandatory. Not providing this information may mean we are unable to proceed with the contract or employment relationship.

There will be times where we receive information relating to you from a third party for example:

- (a) Tax related information from Governmental tax agencies
- (b) Membership information from pension administrators, providers and pension trustees to support the running and fulfilment of the pension schemes, including completion of your Annual Benefits Statement
- (c) Information from external training providers to confirm attendance and completion of courses.

- (d) Information from your own health professionals, external occupational health or other medical specialists regarding fitness for work.
- (e) Vetting, verification and background checks may be completed on our behalf by third parties when recruiting for specific roles.

We are committed to being transparent and fair in our dealings with you, therefore we only collect and hold your information where we have lawful grounds to do so. There are various reasons why we require your information, the primary reason is to manage our employment relationship with you.

Please see the “Tell me more” box below.

TELL ME MORE.	
...about why JLR holds your information...	
The main reasons why we collect and use your information, and the lawful grounds we rely on are: ¹	
Why we collect and use your information:	Our lawful grounds to collect and use your information:
<p>Recruitment process:</p> <p>If you apply for a new position or are promoted, we use your information to confirm who you are, your eligibility to work for us, as well as whether you are suitable for the role.</p> <p>Also, when you apply for another role within JLR, then your current line manager is informed of the fact so that they are aware.</p> <p>We also may use demographic data (e.g., Sex, Ethnicity data, Disability data etc) that you provide for monitoring inclusion, identifying and reducing any bias and ensuring fairness within the recruitment process.</p> <p>Information used includes your application details, any assessment test results, and interview notes.</p>	<p>In pursuit of fulfilling the recruitment process in a fair and effective manner, the lawful basis relied upon are:</p> <p>JLRs Legitimate business interest; and</p> <p>Reasons of substantial public interest (with a basis in law)</p>
<p>Staff administration and management:</p> <p>Here we use your information to manage our employment relationship and provide support during your employment. Examples include supporting employees with queries raised to HR Direct, offering a recognition scheme, managing and administering sickness absence and holiday, TUPE, and other leaves of absence such as maternity and paternity.</p>	<p>In order to appropriately manage our relationship with you, understand the health of our succession plans and plan effectively for the future, including monitoring progress against inclusivity targets, as well as effectively run the business, the lawful basis relied upon are:</p> <p>Contractual requirements;</p>

¹

<p>We use your information to enable us to effectively manage employee engagement, employee performance and conduct. For example, employee opinion surveys, competency assessments and performance review information (including the calibration of performance ratings). We also use demographic data (e.g., ethnicity, sex, tenure, age) for identifying and reducing any bias and ensuring fairness within the performance process. We use attendance data for management of absence and trend reporting.</p> <p>We also use your information to ensure you have access to and receive appropriate training, growth & development for your role. Completion, attendance and any scorings of courses will be recorded.</p> <p>We may, when appropriate, carry out talent and succession planning activities, such as keeping records of talent review history and whether certain roles require a position on a future succession plan. We may also use demographic data (e.g., sex, Ethnicity data), that you provide for monitoring inclusion, identifying and reducing any bias and ensuring fairness within the talent review process, succession planning processes and identification of individuals for development interventions.</p> <p>For individuals that do not have regular access to a JLR work email account, we may use your personal email and postal address to communicate directly with you on key business news, emergencies and employment services (including Case Management support) that may affect you.</p> <p>Examples of communications that may be sent to your personal addresses include Employee Opinion Surveys (e.g., employee net promoter score, Pulse), Policy and T&C's announcements, Newsletters, Health & Safety announcements, Organisational updates, Recognition (Long service), Special offers & Competitions etc.</p>	<p>Legal requirements, such as employment and social protection law;</p> <p>JLRs Legitimate business interest.</p> <p>Reasons of substantial public interest (with a basis in law); and Explicit Consent</p>
<p>Pay, & expenses:</p> <p>We use your information to ensure that we pay you in line with your contract, process any</p>	

<p>payments in addition to salary (e.g., expense payments), and support you with the statutory sick pay process.</p> <p>We are required to use your information to comply with taxation requirements.</p> <p>Examples of information used to process payments may include bank details, pension details, and salary and payroll records.</p> <p>For unconnected employees personal email addresses will be used (if registered) for access to expense system.</p>	<p>In order to fulfil our employer obligations to you and regulatory bodies, the lawful basis relied upon are:</p> <p>Legal requirements;</p> <p>Contractual requirements; and</p> <p>JLRs Legitimate business interest.</p>
<p>Domestic and International Travel & Global Mobility</p> <p>Core personal information will be used to create a travel profile to enable all UK employees and agency staff to book and amend arrangements for business travel.</p> <p>If you go on an international assignment, or conduct global business travel, we will use your information to organise and provide support to you in preparation for and during your time outside of the UK.</p> <p>For example, we keep information such as name and contact details, travel booking information, host country address, taxation records, visa and work permit information, and dependent data.</p> <p>For any international business travel JLR will share your basic information (name and email address) with an approved business partner within the occupational health industry Who will contact you to arrange an assessment.</p> <p>For information:</p> <p>The business partner (as described above) will directly contact you in order to proceed with the pre-travel health questionnaire that must be completed ahead of overseas travel. Information provided as a result of the pre-travel questionnaire will be managed by the business partner and will not be shared with JLR unless you grant the business partner explicit consent, to share with JLR. They will be</p>	<p>In order to make sure you are eligible and fit to travel and manage the travel bookings and associated processes, the lawful basis relied upon are:</p> <p>Legal requirement;</p> <p>Contractual obligations (for those who are required to travel as part of their role);</p> <p>JLRs Legitimate business interest; and</p> <p>(in limited circumstances) Preventative occupational medicine.</p>

<p>the data controller of any information you provide to them.</p>	
<p>Product development research:</p> <p>Use of prototype cars as part of your job role including for research for product development relating to automated and connected cars or where employees volunteer to participate in vehicle studies.</p> <p>Information may include your feedback on vehicle attributes, video footage when driving the vehicle, biometric readings, music preferences, journey information, and location data, as well as data related to your driving experience.</p>	<p>In order to obtain appropriate feedback for the development of our vehicles, the lawful basis relied upon are:</p> <p>(Where relevant) - Contractual requirements; and</p> <p>JLRs Legitimate business interest.</p>
<p>Workforce planning & analytics:</p>	

<p>To understand workforce trends to drive effective workforce planning. For example, to identify future skills gaps, demographic trends or to monitor progress against diversity targets.</p> <p>Information used for this purpose tends to be aggregated (and therefore becomes anonymous data) so that trends and themes can be identified. We use your information in order to monitor the mix of various characteristics. This includes but is not limited to ethnicity; gender; sexual orientation; disability; carer responsibility; age.</p>	<p>In order to understand our workforce trends and plan effectively for the future, including monitoring progress against diversity targets, the lawful basis relied upon are:</p> <p>JLRs Legitimate business interest; and</p> <p>Reasons of substantial public interest (with a basis in law)</p>
<p>Protection of patents or other IP rights:</p> <p>On occasion your information will be used in registering and protecting patents and other IP rights.</p> <p>Information used for this purpose will be name and role.</p>	<p>In order to protection JLRs business interests, the lawful basis relied upon are:</p> <p>Contractual requirements; and</p> <p>Legal requirements.</p>
<p>Health, safety and wellbeing:</p> <p>We use your information when assessing, monitoring and recording health and safety related activities, including assessing fitness for work and appropriate adjustments and identifying ways in which JLR can promote and improve the health and wellbeing of its workforce. Where necessary, your information, including health related information will be shared with JLRs Occupational Health provider (where you agree), to support you receiving appropriate health support where needed.</p> <p>In addition to the above, we may also use your information such as names, email address and workplace location to facilitate provision of health services such as Covid and flu vaccination.</p> <p>We may use your information during the completion of risk assessments, as required by legislation. This may include personal information required to understand personal circumstances and resulting support needed as well as to permit processes to control identified risks e.g., to obtain Personal Protective Equipment.</p>	<p>In order to maintain employee health, safety and wellbeing, the lawful basis relied upon are:</p> <p>Legal requirements such as employment and Health and Safety law as well as government and regulatory guidance;</p> <p>Preventative occupation medicine.</p> <p>(In limited circumstances such as monitoring infection control) Public Health; and</p> <p>JLRs Legitimate business interest</p>

<p>From time to time, JLR might be required to evidence adherence to legislation during monitoring activities such as incident reporting, investigation and safety audits, both internally and externally. This may include sharing records such as risk assessments, training records, incident investigation forms or corrective actions, attendance at team meetings, sickness records and occupational health-related advisory notes such as occupational health reports, infection control results (such as COVID-19, TB).</p> <p>We may have an obligation to share your personal and health data with your line management and, in limited circumstances, with public bodies such as Public Health England and the Health and Safety Executive.</p>	
<p>Security & Compliance with JLR policies, procedures and processes and compliance with legal requirements:</p> <p>We use your information to maintain both on-site security and information security. We will also use your data to determine whether JLR policies and procedures are being upheld, this will include the management of a Corporate Investigations and Whistleblowing hotline Video images may be captured as part of process improvement / training.</p> <p>Your information may also be used to comply with legal requirements (where necessary), such as regulatory compliance audits.</p> <p>Personal information used can include pay, contractual and qualification details, driving license details, the monitoring of JLR asset usage, CCTV images and site access.</p>	<p>For the purposes of remaining legally compliant, maintaining the appropriate working standards and the safety and security of all JLR sites, assets and workforce, the lawful basis relied upon are:</p> <p>Legal requirements; and</p> <p>JLRs Legitimate business interest.</p>
<p>Employee Benefits & Discount Schemes:</p> <p>We collect and use your information to enable you to take advantage of employee benefits including but not exhaustively; Pension, Management Cars, Management Healthcare, Life Assurance, Income Protection, Ford Privilege, JLR Privilege, Employee Learning Scheme (ELS)</p>	<p>In order to offer you benefits and discounts, the lawful basis relied upon are:</p> <p>Contractual requirement; and</p> <p>JLRs Legitimate business interests (where appropriate).</p>

<p>Optional Voluntary Benefit or discount providers may also use your data to enable your participation in the benefit.</p> <p>Depending on the benefit, the data may include, but not limited to, DOB, Gender, Salary, NI number, Dependants information, personal and/or company email address, absence details</p>	
<p>Corporate Credit Card Scheme</p> <p>We use your information when managing and administering the corporate credit scheme, including managing the approval process, chasing delinquent balances and reporting on the value of spend on cards.</p> <p>Information used in these processes include your name, company email address and company credit card number.</p>	<p>In order to successfully manage the corporate credit card scheme, the lawful basis relied upon is:</p> <p>JLRs Legitimate business interests.</p>

Where we collect your information for a specific project or initiative, we may supplement the contents of this Privacy Notice with specific details about those data handling activities, e.g., if you take part in a JLR event or prize draw. Look out for notices associated with those specific activities.

In certain circumstances, as part of our recruitment process, we may carry out some automated decision making to enable us to effectively identify candidates who do not meet set criteria critical for a specific role, or where there is very high volume of applications which require a timely response. The consequences of automated decision making within the recruitment process may be that you do not make it to the next stage of the selection process.

Who we share your information with and why.

We may share your information with:

- Those third-party suppliers who need to handle your information so we can manage the working relationship, for example, to pay you, offer you benefits, employee opinion surveys, provide appropriate IT and other support services, as well as enable JLR to improve the health and wellbeing of its workforce.
- Our network of retailers, authorised repairers and where relevant our importers network (together our “retail network”), so as to be able to fulfil requests for goods, services, etc. (for instance, company car scheme).
- JLR group companies in line with the data uses set out in this Privacy Notice.
- If we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or requests, or in order to enforce these terms or to investigate actual or suspected breaches.

Please see the “Tell me more” section below.

We have safeguards in place with our third-party suppliers to ensure that your data is kept securely, in a lawful manner and used in accordance with the purposes set out in this Notice.

TELL ME MORE ...

... about third-party suppliers ...

We use a number of third-party suppliers to fulfil our contractual and legal obligations with you and support our business. Some of these suppliers will have access to our systems in order to provide services to us and on your behalf, for example information technology support, recruitment services and staff administrative support.

... about JLR's independent third parties ...

We work with a number of independent third parties who provide JLR with support and services, such as legal advice, pensions administration, consultancy work, and audits. Where necessary we may share your information with them where appropriate to support our requirements. We may also share your data with third parties who directly provide and manage your membership to the various pension schemes they offer.

... about JLR group companies, and how they may provide service support ...

As a member of the Tata Group of companies, we can benefit from the infrastructure and expertise that exists within our wider corporate structure. This means that the information you provide to us may be accessed by members of our group of companies only as necessary for service and system maintenance and support, aggregate analytics, business continuity, IT and administrative purposes.

... about public bodies, government agencies, law enforcement and regulators ...

From time to time, the police, other law enforcement agencies, government departments and regulators can request information, for example, for the purposes of investigating, preventing or detecting crime, or apprehending or prosecuting offenders.

JLR has strict processes in place which govern such disclosures. These shall be affected where disclosures are mandated by law or by virtue of the authorities' role and there is a compelling business and legal reason to do so.

Each third-party supplier is only permitted to use your information on our written instructions, within the limited scope of the service contract they fulfil for JLR. We take all necessary steps to safeguard your information by imposing strict restrictions on how your information is used, stored and processed by our suppliers. We have audit processes in place designed to verify that service providers meet our standards.

For further information on how we safeguard your information, please see the section below.

How we keep your information secure and international data transfers.

We are committed to keeping your information secure. We have put in place organisational and technical security measures designed to adequately protect your information. We have in place corporate and operational policies and processes (available on the JLR Way) detailing the standards of information security expected throughout JLR. This includes appropriately training all relevant personnel on their privacy, data protection compliance and information security obligations.

You also have a role to play in the security of your information. Where you have a password enabling you to access JLR systems, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

We will always aim to use servers which are hosted in the EU. However, in limited circumstances we will share your information with third party suppliers of services or technology, or group companies located outside of the EU where this is necessary for the purposes described above. Where this happens, we apply safeguards to add to the data protections that apply to those data transfers. This includes an assessment of the adequacy of the third country in question, use of European Commission approved model contract terms where appropriate, and assessment of Privacy Shield certification for US located entities where applicable.

For those employees who are based overseas, certain information that is held centrally within the EEA, may be accessed by or shared with those specific JLR overseas local offices in order to support the management of the employer – employee relationship.

Please see the “Tell me more” box below.

TELL ME MORE ...

... about the adequacy checks JLR puts in place for international data transfers ...

Where JLR chooses to share your information with a third-party supplier located outside the EU, the following factors are assessed to support adequate transfer of this data:

- Internal checks to identify the existence or absence of any adequacy decision by the European Commission. We have group companies and use third party suppliers located in countries that have been approved by the European Commission as having essentially equivalent data protection laws. A full list of these countries as at the date of this Privacy Notice is: Andorra, Argentina, Canada, Faroe Islands, Guernsey, Israel, Isle of Man, Japan, , Jersey, New Zealand, Republic of Korea, Switzerland, UK (under the [GDPR](#) and [LED](#)) and Uruguay. This list and information about the protections the European Commission has considered, is available via [this link](#).
- Use of measures like European Commission approved measures to support adequate transfers of personal data. We also have group companies and use third party suppliers located in countries that are elsewhere in the world. To manage data protection compliance with these transfers, we will use European Commission approved data transfer mechanisms such as use of model contractual clauses approved by the Commission. To understand the protections required in European Commission approved Model Clauses, a template copy of these [is accessible from this location](#).

How long we keep your information.

We'll keep your information for as long as we need it to fulfil our contractual obligations and manage the employee / employer relationship, as well as to comply with our legal obligations, to meet our legitimate interests and to enforce our rights. Retention of your information is governed by the [JLR Records Management Procedure \(RMP\)](#), and the supporting [Schedule](#) which is reviewed on an annual basis. At the end of the appropriate retention period, your information will be securely disposed of in line with the RMP standards.

The criteria we use to determine storage periods include the following: applicable contractual provisions that are in force, legal statutory limitation periods, applicable regulatory requirements and industry standards.

Your rights

You have rights in connection with your information, including: to withdraw consent where you have given it, to be informed and have access to your information, to correct or complete inaccurate data, and in certain circumstances to restrict, request erasure, object to processing, or request portability of your information to another organisation.

If you want to get in touch with us for any reason regarding your data protection rights, please use the contact details below and inform them / add into the subject header that it relates to your data protection rights.

- For the UK and ISEs from the UK - contact HR Direct by email hrdirect@jaguarlandrover.com
- For other locations - contact your local HR Manager

If you have a data protection complaint, please contact us at this email address: DPOffice@jaguarlandrover.com. If you are not satisfied, you also have the right to complain to the Information Commissioner's Office.

To learn more about these data protection rights, see the "Tell me more" box below.

TELL ME MORE ...

... about your data subject rights ...

- There may be limited circumstances where you have consented to us collecting and processing your data. Where this is so, you have the right to withdraw your consent at any time. If you withdraw consent, we will cease processing your information for the reasons that consent was obtained.
- You can ask for access to the information we hold about you. Should you wish to do so, please make your request to HR Direct for the UK or your local HR Manager for other locations. JLR will then respond accordingly to your request within the statutory timeframe.
- You can object to the processing of your data, restrict or stop processing or request deletion of your data. If you do ask us to delete or stop processing it, we will not always be able to do so. If this is the case, we will explain why.
- In the UK, you should update your information yourself (e.g., contact details, bank details, emergency contact details) in line with your contractual obligations **using the Change of Personal Details Form**. For circumstances such as a name change, we may ask to see additional proof of change documentation.

We will periodically communicate with you asking that you check and update your information. It is important you do so, in order to enable us to interact with you on the basis of current information.

Any questions or issues with updating your information, or where you wish for us to correct any mistakes, please use the contact details provided above.

- In certain circumstances you can ask us to provide you with your information in a usable electronic format and transmit it to a third party (data portability). This right only applies in certain circumstances. Where it does not apply, we will explain why.

... about how you can make a complaint...

- You have the right to make an official complaint about the way we handle your information. In the first instance, please contact the Privacy and Data Protection Team (details below).
- If you do not feel that your complaint has been suitably addressed, you can contact your local data protection regulator, in the UK, this is the Information Commissioner's Office.

... about how to get in touch with the Information Commissioner's Office (ICO) ...

- The Information Commissioner's Office (the ICO) is the supervisory authority that regulates personal data in the UK. You can get in touch with the ICO in any of the following ways:
- By going to their website: www.ico.org.uk
- By giving them a call on 0303 123 1113
- or by writing to them. Their address is: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow SK9 5AF.

Contact us.

If you have an issue regarding the information, we hold on you, we would ask that you first aim to resolve this through contacting HR with relevant details. Should you have any complaints or queries, feel free to contact HR on the details above, or escalate to the Privacy and Data Protection Team at DPOffice@jaguarlandrover.com.

We will aim to respond to any queries, concerns or complaints raised with the Privacy and Data Protection Team within 5 working days.

JLR Limited, Abbey Road, Coventry, CV3 4LF.

Company Number 1672070.

How we are regulated: For UK data protection legislation purposes, JLR is registered with the Information Commissioner's Office under registration number ZA020510.

Changes to this Privacy Information Notice.

This Privacy Information Notice will be reviewed on an annual basis and updated as and when required. Whenever any significant changes are made, we will aim to issue a notification with a link to the new updated version.

Last Updated: December 2023