EMPLOYEE DATA PROTECTION NOTICE

ABOUT THIS DOCUMENT

The purpose of this notice is to make you aware of the basis on which Norbar Torque Tools Limited ("Norbar" or "we") will process any personal data that we collect from you, or that you provide to us.

We collect and hold personal data (on paper, electronically, or otherwise) about our staff for the purposes set out in this notice. We recognise the need to treat your personal data in an appropriate and lawful manner.

This notice does not form part of any employee's contract of employment and we may amend it from time to time. If we do, the amended notice will be included in the Employee Information Binder and we will endeavour to notify you through the Employees' Council.

If you have any questions about this notice, please contact the Head of HR.

DEFINITIONS

"Personal data" means any recorded information we hold about a living individual from which that individual can be identified. Personal data can be factual (for example, a name, address or date of birth) or it can be an opinion about that person, their actions and behaviour.

"Sensitive personal data" (also known as "special categories" of data) includes information about a person's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health or condition or sexual life, or genetic or biometric data, and in certain cases data concerning the commission of, or proceedings for, any offence committed or alleged to have been committed by that person, the disposal of such proceedings or the sentence of any court in such proceedings. Additional conditions apply to processing of "Sensitive personal data".

"**Processing**" means doing anything with the data, such as obtaining, using, holding, amending, disclosing, deleting, destroying, storing and transferring the data in any way. This includes paper-based personal data as well as that kept electronically.

DATA PROTECTION PRINCIPLES

Anyone processing personal data must comply with principles of good practice as set out by law. These provide that personal data must be:

(a) Processed fairly and lawfully and in a transparent manner.

(b) Processed for limited purposes and in an appropriate way.

(c) Adequate, relevant and not excessive for the purpose.

(d) Accurate, and kept up to date where necessary.

(e) Not kept longer than necessary for the purpose.

(f) Kept secure.

In addition, data should be processed in line with individuals' rights and not transferred to people or organisations situated in countries without adequate protection.

FAIR AND LAWFUL PROCESSING

We will collect and process certain classes of personal data In the course of our business. The types of data we will collect are set out in the Schedule to this notice. We may receive these data directly from you (for example, when you complete a form on paper or on-line or correspond with us by mail, phone, email or otherwise) or from other sources (including, for example, work colleagues, previous employers, training establishments, credit reference agencies and others).

We will process your personal data for one or more of the following reasons: (i) it is necessary for us to perform a contract with you, (ii) for compliance with a legal obligation as an employer (including to pay you, monitor your performance, to confer benefits in connection with your employment, and collection and disclosure requests in the context of litigation or government investigations), or (iii) for our legitimate interests or the legitimate interests of others (including legal, investigatory, personnel, administrative and management purposes), or (iv) for the protection of your vital interests.

We will only process "sensitive personal data" where a further condition is also met. Usually this will mean that you have given your explicit consent, or that the processing is legally required for employment purposes.

ADEQUATE, RELEVANT AND NON-EXCESSIVE PROCESSING

We will only process your personal data to the extent that it is necessary for the specific purposes set out in this notice or as permitted by law.

For examples of how we are likely to use your data, see the attached Schedule.

ACCURATE DATA

We will endeavour to keep the personal data we store about you reasonably accurate and up to date by reminding you to inform us of any changes on a regular basis and enabling you to correct it by request. Please help us by notifying us if your personal details change or if you become aware of any inaccuracies in the personal data we hold about you.

DATA RETENTION

We will endeavour not to keep your personal data in a form that allows you to be identified for any longer than is reasonably necessary for achieving the permitted purposes for which we hold it. This means that personal data will be destroyed or erased from our systems or anonymised when it has reached the applicable retention period.

PROCESSING IN LINE WITH YOUR RIGHTS

You may have the right to:

(a) Request access to any personal data we hold about you.

(b) Object to the processing of your data for direct-marketing purposes.

(c) Ask to have inaccurate data held about you amended or updated.

(d) Ask to have your data erased or to restrict processing in certain limited situations.

(e) Request the transfer of your personal data to another organisation in control of your personal data;

(f) Object to any decision that significantly affects you being taken solely by a computer or other automated process.

If you wish to make a formal request for information we hold about you, you should do so in writing to the Head of HR or through the subject access request portal on our website. If you receive a written request for information we hold about someone else, you should forward it to the Head of HR immediately.

DATA SECURITY

We will seek to ensure that appropriate measures are taken against unlawful or unauthorised processing of your personal data, and against the accidental loss of, or damage to, your personal data.

We have in place procedures and technologies which seek to maintain the confidentiality, integrity and availability (for authorised purposes only) of all of your personal data from the point we collect it to the point we destroy it. We will only transfer personal data to a third party if they agree to comply with those procedures and policies, or if they put in place adequate measures of their own.

DISCLOSURE AND SHARING OF PERSONAL INFORMATION

We may share personal data we hold with any member of our group, which means our subsidiaries and our ultimate holding company and its subsidiaries. It will also be shared with relevant personnel within the group for the purposes as described in the Schedule.

We may also disclose personal data we hold about you to certain third parties including benefits providers such as pension and life assurance companies, occupational health providers, payroll providers, accountants, legal advisers, law enforcement authorities, regulators, recruitment agencies, background check agencies other government authorities and adverse parties who have a legal right to receive such information (and their counsel and experts). We will only disclose your personal data for the purposes set out in the Schedule or elsewhere in this notice.

In the event that we sell or buy any business or assets we may disclose personal data we hold to the prospective seller or buyer of such business or assets. In these circumstances, we will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this notice and applicable laws.

TRANSFERRING PERSONAL DATA TO A COUNTRY OUTSIDE THE EEA

We may transfer your personal data to members of our group or to other third party service providers (as set out above) who are based outside of the EEA, provided that certain conditions are complied with.

We will require that there is an adequate level of protection for your personal data and that appropriate technical and organisational security measures are in place to protect your personal data against accidental or unlawful loss or destruction and against all other unlawful forms of processing.

BREACHES OF DATA PROTECTION PRINCIPLES

It is the responsibility of everyone within the business to protect personal data and deploy reasonable measures to prevent data breaches occurring. If you consider that this data protection notice or data protection laws have not been followed in respect of personal data about yourself or others, then you should raise the matter with your line manager or the Head of HR. Any breach of applicable data protection laws or this notice will be taken seriously and may result in disciplinary action.

You also have the right to lodge a complaint with the applicable supervisory authority, which in the UK is the Information Commissioner www.ico.org.uk.

EMPLOYEE OBLIGATIONS

As well as having certain rights over your personal information, you must also comply with applicable data protection laws when processing personal information. It may be that as part of your job, you process personal information about employees or about other individuals who work with or who are associated with our

company, or are asked to disclose personal data by others. Even if you do not have direct involvement with personal information as part of your job, there may be times when you are asked by others to supply personal information. At all times you should be mindful of your obligations with regards to data protection. Any breach of applicable data protection laws or this notice may lead to disciplinary action.

SCHEDULE

Class 1: Data:

Generally available contact information, such as: name, nickname (or known as name), job code, line manager, email address (personal and work), mobile phone number (personal and work), employment location, job title, employee number, photographs for identification purposes or security purposes.

We will use this data to provide an efficient means for employees to obtain the contact information of their colleagues and contact them for business related purposes; to manage directories, professional calendars and organisation charts; and to facilitate introductions (for example, by inclusion in staff newsletters/magazines) and team work within the group.

Class 2 Data:

Human resources data, such as: passport number and information, national insurance and social security information, citizenship status, date of birth, gender, visa information, citizenship country, marital status, emergency contact details, driver's licence information, car registration numbers, home address, work location, language proficiency, job grade, job title, employee group, educational information, CVs, information on previous employer, basic pay, bonus, other salary information, hours worked, compensation information, birth location, employment dates, job performance information, discipline information, training information, days of leave taken per year.

We will use this data to plan and manage human resources, including but not limited to centralising and processing human resources information in a cohesive and uniform manner, managing and administering staffing, employee evaluations, cooperation, promotions, performance management, training, discipline, and any other processing related to human resources purposes; for cross-border teamwork, global and local recruitment, investment decisions, and professional mobility including secondments and transfers within the group; analyse company-wide employment and compliance policies and practices and to monitor compliance; support and manage employees; to monitor and manage leave; to monitor and manage business trips; accounting and cross-charging for salary expenses among the group companies that benefit form contributions by our employees, administer compensation and benefit programs, payroll, succession planning, stock options; calculate compensation and adjustments to compensation (including commissions, bonuses, and benefits); to administer health and safety obligations including but not limited to work related accidents; participate in company provided programs and events; to provide discounts; provide career development opportunities; promoting healthy lifestyles; to notify family members or designated contacts in case of an emergency; complying with applicable global laws and reporting requirements; to administer use of telephones, mobile phones, credit cards, company cars, IT and any other equipment; to administer the follow-up and maintenance of IT equipment; to administer employees' representatives bodies; to manage access, opposition and rectification rights; to respond to discovery requests in the context of litigation or government investigations, and to ensure compliance with applicable law; and providing other tangible and intangible global and local benefits.

Class 3 Data:

Data necessary for benefits, incentives, pensions, bonuses and stock plan administration services, such as: name, citizenship country, email address, national insurance number, commencement date, home address, date of birth, dates of grants under equity plans, pension plan data including accrued benefits, compensation information, bank account number, family beneficiary.

We will use this data to provide benefits, incentives, pensions, bonuses and share plans and administration services, to enable the management of such plans and schemes, to calculate insurance and other employee benefits.

Class 4 Data:

Security badge information, such as: name, employee number, job code, photographs for identification purposes or security purposes. Data from the Closed Circuit Television system (CCTV) and Automatic Number Plate Recognition software (ANPR). Data from the time and attendance and access control systems.

We will use this data to control access to our facilities, safeguard data protection, and prevent security breaches. We may also use it for monitoring the attendance and/or conduct and performance of individuals. The CCTV policy contains further details of how the CCTV and ANPR data may be used. Information from the time and attendance system may be used to adjust salary payments.

Class 5 Data:

Employee health information, such as: medical reports, medical questionnaires, disability information, mandatory employee health reviews and vaccine plans, workplace illness and accidents, sick notes, data on sick leave (as collected and processed in the course of existing employment and relevant for payroll and related tax processing, e.g. with regard to sick payment, and sickness absence management), return to work forms and self certificates for sickness absence.

We will use this data to comply with health and safety obligations, assure a safe working environment, monitor equal opportunities, comply with disability discrimination laws, monitor sickness absence and identify patterns of sickness absence, calculate the number of sick days for statutory and contractual sickness payments, take decisions as to the employee's fitness for work, and with regards to pregnancy and maternity-related information, complying with applicable labour laws. We also use sickness absence records when considering whether staff status and long service status should be awarded and provide some information on long term sickness to our life assurance company for the purpose of calculating our renewal quote.

Class 6 Data:

Background checks, such as: criminal records, qualifications, reference checks.

We will use this data to assess suitability for employment or for a particular position.

Class 7 Data:

Information obtained from monitoring of an employee’s Norbar email account or internet browsing history on a Norbar issued device; from inspection of invoices relating to Norbar issued mobile phones; or from other written or electronic communications made on behalf of Norbar including live chat conversations.

We do not carry out any routine monitoring of employee’s email accounts, internet use, telephone use or other Norbar communications. Occasionally checks may be carried out in response to specific requests from HR or managers where there is reason to believe there has been a breach of any employment policy or for training purposes or to investigate customer or employee complaints.