



JAGUAR LAND ROVER EMPLOYEE PRIVACY NOTICE

Jaguar Land Rover Privacy Notice (“Notice”) UK

Introduction

Jaguar Land Rover (“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.

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.

To make it easier to navigate, we have adopted a layered approach. Please click on any of the Quick Links in bold below to expand the section. Whilst in a section, you will be able to see further information by clicking on the “Tell me more” box.

Contact details: If you would like to get in touch with an employee related query:

- **For the UK and ISEs from the UK** - contact HR Direct by email hrdirect@jaguarlandrover.com or by telephone on the following numbers
 - **047** from an internal phone
 - **01926 691 747** from a mobile or landline
 - **0800 121 4747** Freephone UK number

QUICK LINKS:

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What information JLR holds about you and why.

Document: Jaguar Land Rover Employee Privacy Notice
JLR-RMP item number: 41.1
JLR retention code: S+1
JLR-RMP security classification: Proprietary

Issue: 3.0
HR
Issue date: August 2020
Review date: January 2021



Personally identifiable information is information that we hold on 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.

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

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>Information used includes your application details, any assessment test results, and interview notes.</p>	<p>Legitimate business interest in fulfilling the recruitment process in a fair and effective manner.</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 managing and administering sickness absence and holiday, and other leaves of absence such as maternity and paternity. If you call into HR Direct Contact Centre with a question, your calls will be recorded.</p> <p>We use your information to enable us to effectively manage employee performance and conduct. For example, competency assessments and performance review information (including the calibration of performance ratings), and 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 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.</p>	<p>Contractual requirements and legitimate business interest in managing our relationship with you effectively, lawfully and appropriately, as well as running the business</p>



<p>For individuals that do not have regular access to a Jaguar Land Rover 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 that may affect you.</p> <p>Examples of communications that may be sent to your personal addresses include Employee Opinion Surveys, Policy and T&C's announcements, Newsletters, Health & Safety announcements, Organisational updates, Special offers & Competitions etc.</p>	
<p>Pay and benefits:</p> <p>Here we use your information in line with contract terms including to ensure that we pay you in line with your contract and process any payments in addition to salary (e.g. expense payments), as well as to enable you to receive any agreed benefits, including pension, bonus awards, or changes to pay levels.</p> <p>We also 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>Legal and contractual requirements and legitimate business interest in fulfilling our employer obligations to you and regulatory bodies.</p>
<p>International Service Employee assignments</p> <p>If you go on an international assignment we will use your information to organise and provide support to you during your assignment.</p> <p>For example, we keep information such as host country address, taxation records, visa and work permit information, and dependent data.</p>	<p>Legal requirement to fulfil our contractual obligations.</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>Contractual requirements and legitimate business interest in order to obtain appropriate feedback for the development of our vehicles.</p>
<p>Workforce planning & analytics</p> <p>To understand workforce trends to drive effective workforce planning. For example, to identify future skills gaps or demographic trends.</p> <p>Information used for this purpose tends to be aggregated so that trends and themes can be identified. Examples include location, education, gender, ethnicity, nationality and length of service.</p>	<p>Legitimate business interest to understand our workforce trends and plan effectively for the future.</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>Contractual and legal requirement to protect business interests.</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.</p> <p>For example, incident records, medical information, sickness records and occupational health related advisory notes such as duty disposition reports.</p>	<p>Legal requirement and legitimate business interest to maintain employee health, safety and wellbeing.</p>
<p>Security & Compliance with JLR policies and procedures</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.</p> <p>This includes information such as driving license details, the monitoring of JLR asset usage, CCTV images and site access, and management of a Corporate Investigations and Whistleblowing hotline.</p>	<p>Legal requirement and legitimate business interest to put in place appropriate working standards and maintain the safety and security of sites, JLR assets and workforce.</p>
<p>Employee Benefits & Discount Schemes</p> <p>We collect and use your information to enable you to take advantage of employee benefits including management cars, Privilege discounts and discounted branded goods.</p> <p>This includes data such as Personal Email addresses, work email addresses, and name.</p>	<p>Contractual requirement, and legitimate interests where appropriate.</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 some countries to meet our legal obligations we may be required to capture information, such as gender, ethnicity and sexual orientation. In other instances where such information is requested, we will let you know if it is a mandatory or voluntary requirement and where mandatory, why.

In certain circumstances, as part of our recruitment process we may carry out some automated decision making, including profiling for example to enable us to effectively identify candidates who do not meet set criteria critical for a specific role, or where there are 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 parties suppliers who need to handle your information so we can manage the working relationship, for example, to pay you, offer you benefits and 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” box 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 effected 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, Switzerland, Jersey, New Zealand, Uruguay and the Isle of Man. (The European Commission has also approved as adequate the EU-US Privacy Shield programme – this is described below). 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. We may work with third party suppliers who are able to demonstrate to us they are Privacy Shield certified.
 - To understand the protections required in European Commission approved Model Clauses, a template copy of these [is accessible from this location](#).
 - A full list of Privacy Shield participants, and their Privacy Shield certification information is available from [this website link](#).



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 those outside of the UK, please contact your local HR team.

- **For the UK and ISEs from the UK** - contact HR Direct by email hrdirect@jaguarlandrover.com or by telephone on the following numbers
 - **047** from an internal phone
 - **01926 691 747** from a mobile or landline
 - **0800 121 4747** Freephone UK number
- **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 my 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, if you have access to 'my JLR' or Success Factors, you should update your information yourself (e.g. contact details, bank details, employee profile) in line with your contractual obligations. If you do not have access to my JLR, please complete the change of personal details form (available at your nearest People Centre). Complete the form and give it to your manager. For circumstances such as a name change we may ask to see additional proof of change documentation. Employees without access to a People Centre should ask their manager to download a form for them.

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 I 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.

... 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.

Jaguar Land Rover 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 required. Whenever any such changes are made, we will aim to issue a notification with a link to the new updated version.

Last Updated: [11.03.20]