

## Respect for privacy and use of personal data

The privacy and the security of your information is very important to us. Air Liquide's policy is to respect and protect the privacy of our service users and employees. We will not voluntarily disclose individually identifiable information about our employees to any third party without first receiving the employee's permission to do so, unless there is a lawful or contractual requirement. We will never forward your personal data on to third parties for direct marketing purposes.

## Why we hold and process your data

Air Liquide requires your personal data in order to enrol you on our system as an employee, in accordance with Republic of Ireland and UK law. We only request, store and process the minimum amount of personal information which is necessary for carrying out the terms and conditions referenced in the Air Liquide contract of employment for payment of salary, employment performance monitoring, health and wellbeing monitoring, management of disputes and anything else which you may have provided your consent for. This may include for example name, address, next of kin, medical records, previous employment history, bank details, some sensitive data such as ethnic origin (voluntary) and any other labour related information. Please note that this list is not exhaustive.

Failing to provide the necessary data that is required for the fulfilment of your employment contract may result in your contract of employment being terminated by Air Liquide. This includes information relating to payment of your salary.

## Procedure for collecting your personal data

Employee personal data may be collected in a variety of different ways including:

- Directly from you (whether in writing or verbally)
- From company conversations and correspondence such as Performance and Development Reviews (PDRs), Managers, Training courses and Health & Safety Monitoring.
- Third Parties specific for the purpose of employment administration for example previous employers, HMRC/Revenue, Disclosure and Barring Services (DBS checks & Garda vetting).

Your personal data is held securely with restricted access to only the personnel responsible for carrying out daily tasks relating to Human Resources; this will include your Line Manager. Statutory retention periods apply in all instances. Further information relating to retention periods can be obtained from the company's Data Protection Officer.

## It is important that your personal data is kept up to date

Air Liquide will take all reasonable steps to ensure your personal data is complete, accurate and kept up to date. However, it is also your responsibility to update the company with immediate effect should any of your personal information/data change. The consequence of not providing up to date information could result in error and inaccuracies which could be detrimental to both the employee and Air Liquide.

## Sharing of your personal data

As mentioned above we will not voluntarily disclose your personal data to any third party without first receiving your consent unless there is a lawful or contractual requirement to do so.

Due to the nature of employee data processing we will share your personal information in order to deliver our company contractual obligations to:

- Nominated external payroll provider (including Air Liquide UK Limited, where relevant)
- Air Liquide Europe Business Services (ALEBS) (Finance shared services e.g. for payment of personal expenses and accounting purposes)
- Nominated Pension provider (where applicable)
- External Training providers where a contractual arrangement has been made to provide training
- Vehicle rental firm (where it has been requested and consent received)
- Nominated external insurance provider (e.g. to include private medical insurance, life assurance and in the event of an accident)
- Nominated Occupational Health provider (where applicable but with employee consent only)
- UK Government Home Office (for the purpose of confirming the “Right to work”)
- Nominated Disclosure and Barring Service and Garda & PSNI vetting services (employment contractual requirement)
- Internal and external Lawyer advice in the event of any potential contractual issue/lawsuit or employment law issues
- Air Liquide Group (for management/financial reporting and where an individual has chosen to exercise their rights as stated below)
- Fleet risk & safety management, & driver training system (where applicable, including full licence checks and E-learning driving assessment)
- Health and Safety/Dashcam and driving tracking monitoring systems (where applicable)
- Where we are under a legal obligation to do so, for example where we are required to share information under statute or to prevent fraud and other criminal offences or because of a Court Order for example HMRC, the police, Revenue and Garda.

**Air Liquide Healthcare Limited will not share your personal data with a third country or international organisation.**

## Your Data Subject Access rights

### Right of Access

Under the General Data Protection Regulation (GDPR) and UK GDPR you, as a service user, have the right to know how your data is being processed and also the right to access your personal data.

Under normal circumstances Air Liquide has 30 calendar days to provide the necessary information. However, if your request for more complex requests, is deemed manifestly unfounded or excessive you may be charged a small administrative fee and the 30 calendar days to process your request may be extended for up to an



## PRIVACY STATEMENT FOR EMPLOYEES OF AIR LIQUIDE HEALTHCARE LTD (UK & Ireland)



additional 60 calendar days. In addition, if you require more than one copy of the information, a small administrative fee may be invoked, at the discretion of the Data Protection Officer.

### Other rights under UK GDPR

You may also have other rights (where applicable), for example the right to have any incorrect or incomplete data corrected, the right to object to processing, the right to restrict processing activities and the right to erasure of your personal data. However, it should be noted that your right is not absolute and will only apply in certain circumstances. If you wish to lodge a complaint regarding how your data is stored or processed please contact the company's Data Protection Officer (details below).

For further information on all your data subject rights, including how to lodge a complaint, please refer to -

- The Information Commissioner's Officer (ICO) website <https://ico.org.uk/> (if in the UK), or
- The Data Protection Commission (DPC) website <https://www.dataprotection.ie/> (if in Ireland)

Where you have given consent for Air Liquide to share your data with a third party or for us to process your data in a certain way, you have the right to withdraw this consent at any time.

All employee requests relating to your rights under the GDPR or UK GDPR should be directed to Air Liquide's Data Protection Officer and HR Manager.

### Data Protection Officer

Natasha Bhullar - [alhomecare.dpo@nhs.net](mailto:alhomecare.dpo@nhs.net) (UK)

Alison Dunne - [dpo@airliquide.ie](mailto:dpo@airliquide.ie) (Ireland)

### Head of Human Resources

Paul Smith - [paul.smith2@airliquide.com](mailto:paul.smith2@airliquide.com)

### Privacy Statement Modifications

Air Liquide Healthcare Limited has the right to modify or update this Privacy Statement at any time. Such updates will also be flagged on the website homepage. All such modifications and updates are applicable as soon as they are made.

Michelle Sullivan  
**Information Protection  
Coordinator  
UK & Ireland**

*Michelle Sullivan*  
22/2/2024

Sophie Valle  
**General Manager  
UK & Ireland**

*S Valle*  
26/2/2024