



Pearson

Privacy Notice for employees, workers and contractors

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Why do we have this notice?

Pearson is a data controller and is responsible for processing personal information about you. We are committed to complying with data protection law and protecting the privacy and security of your personal information. This notice describes how and why we collect and use personal information about you during and after your working relationship with us and you should read this carefully to understand how we handle your personal information.

This is a global privacy notice and applies to information collected in all countries where Pearson employees are located and consultants are hired. The actual information collected may vary by country, as permitted by law. Therefore, there may be content in this document that not apply specifically to you. If you have any questions about this policy, please contact dataprivacy@pearson.com

This notice, which applies to current and former employees, workers and contractors and contingent workers. It does not form part of any contract we have with you.

What information might we hold about you?

Personal data, or personal information means any information about an individual from which that person can be identified. We may collect, store, and use some or all of the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Gender.
- Marital status and dependants.
- Next of kin and emergency contact information.
- National Insurance number, Social Security number or other Government identifiers.
- Bank account details, payroll records and tax status information.
- Salary, annual leave, pension and benefits information.
- Start date.
- Location of employment or workplace.
- Copy of driving licence, visas and other Government documents.
- Recruitment information (including copies of right to work documentation, references and other information included in a CV/Resume or cover letter or as part of the application process).
- Employment records (including job titles, work history, working hours, training records and professional memberships).
- Details from background checks and other due diligence processes;
- Compensation history.
- Performance information.

- Disciplinary and grievance information.
- CCTV footage and other information obtained through electronic means such as staff ID cards and swipe card records.
- Information about your use of our information and communications systems.
- Photographs.

Subject to any local or national requirements or restrictions on the collection of specific data referenced below, we may also collect, store and use the following special categories of more sensitive personal information (Special Categories):

- Information about your race or ethnicity, veteran status, religious beliefs, sexual orientation and political opinions.
- Trade union membership.
- Information about your health, including disability status, medical condition, health and sickness records.
- Genetic information and biometric data.
- Information about criminal convictions and offences.

How is this information collected?

We collect personal information about you through the application and recruitment process, either directly from you or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies.

We will also collect additional personal information in the course of job-related activities throughout the period of you working for us (for example, in the course of your use of the Pearson IT and communications systems).

How do we use this information?

Our legal basis for using your personal information

We may use the categories of information in the list above (at paragraph 3):

- To enter into and/or perform our contract or employment obligations with you; and/or
- With your consent; and/or
- to enable us to comply with legal obligations; and/or
- in some cases, to pursue other legitimate interests of our own.

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest or for official purposes.

How we may use your personal information

The types of situations in which we may process your personal information are listed below:

- Making a decision about your recruitment or appointment.
- Determining the terms on which you work for us.
- Checking you are legally entitled to work in the country you will be employed or engaged.
- Paying you and, if you are an employee, deducting tax and benefit or National Insurance contributions.
- Providing the following benefits to you, if applicable:
 - Healthcare;
 - Dental coverage;
 - Share awards / Share save schemes;
 - Life assurance (insurance?);
 - Other local benefits;
- Liaising with your pension provider.
- Administering the contract or employment relationship we have entered into with you.
- Business management and planning, including accounting and auditing.
- Conducting performance reviews, managing performance and determining performance requirements.
- Making decisions about salary reviews and compensation.
- Assessing qualifications for a particular job or task, including decisions about promotions.
- Gathering evidence for possible grievance or disciplinary proceedings
- Making decisions about your continued employment or engagement.
- Making arrangements for the termination of our working relationship.
- Education, training and development requirements.
- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work.
- Ascertaining your fitness and/or qualifications to work.
- Managing sickness absence.
- Complying with health and safety obligations.
- To prevent fraud.
- To monitor your use of our information and communication systems (including email) to ensure compliance with our IT policies and/or in connection with investigations into alleged misconduct including breaches of other Pearson policies, such as the Code of Conduct.

- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- To conduct data analytics studies to review and better understand employee retention and attrition rates.
- Equal opportunities monitoring.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

Where a particular benefit is operated by a third party, they will be a data controller for your personal data and their privacy notice(s) will apply for any applicable benefits you have chosen to access.

Special Categories of personal information

When we can use it

Special Categories (see paragraph 2 above) of personal information require higher levels of protection. We may process such information in the following circumstances:

- In limited circumstances, with your explicit written consent.
- Where we need to carry out our legal obligations and in line with our employment or data protection policies, or for government reporting.
- Where it is needed in the public interest, such as for equal opportunities monitoring and in line with our employment or data protection policies.
- Where it is needed to assess your working capacity on health grounds, and evaluate the need for reasonable accommodations subject to appropriate confidentiality safeguards.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent (such as a medical emergency), or where you have already made the information public.

How we may use it

We may use Special Categories of personal information in the following ways, as permitted by law:

- We may use information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws.
- We may use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits.

- We may use information about your race or national or ethnic origin, veteran status, disability status, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to comply with government reporting or equalities legislation and ensure meaningful equal opportunity monitoring and reporting.
- We may use trade union membership information to pay trade union premiums, register the status of a protected employee and to comply with employment law obligations.

Consent

In most instances, we rely on other legal grounds, including but not limited to contracts, to process your data. In circumstances, where consent is required, we will comply with any applicable local or national requirements.

Information about criminal convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligation, for example our safeguarding obligations for children or vulnerable adults.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where the information is already public.

We will only collect information about criminal convictions if it is appropriate given the nature of the role /or where we are legally able to do so and in order to establish whether you can be employed or engaged by Pearson. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of you working for us.

Automated decision making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We do not envisage that any decisions will be taken about you using automated means, and we will notify you by updating this notice if this position changes. Any use of automated decision making will not have a significant impact on you and will only be used if we have a lawful basis for doing so in the following circumstances:

- Where we have notified you of the decision and given you 21 days to request a reconsideration.
- Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.
- In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

Data Sharing

Why might you share my personal information with third parties?

We may have to share your data with third parties, (including third-party service providers and other entities in the group) where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

If we do share data, we require third parties to take appropriate security measures and only process your data for specified purposes.

Which third-party service providers process my personal information?

“Third parties” includes third-party service providers (including contractors and designated agents) and other entities within our group. Third parties may process personal information about you for the following purposes:

- Payroll processing;
- The provision of employee benefits;
- The provision of pension benefits;
- Background and credit reference checking
- The operation of Pearson’s IT systems;
- The operation and support of Pearson’s IT systems;
- The operation of Pearson’s Finance, Legal and CISO functions.

Transferring information outside the EU

We may transfer and process the personal information we collect about you to another country, including countries outside the EU and Canada to enable Pearson and its service providers to process your information consistent with this Privacy Notice. These countries may include, but are not limited to, the following:

- USA
- Canada
- India
- The Philippines
- UK
- Any other country where Pearson employs staff

To ensure that your personal information receives an adequate level of protection all information is transmitted in a secure manner in accordance with our Privacy Policy and will only be used for the purposes that it was originally collected. We also ensure that model clauses are in force in any relevant legal contracts and agreements (including agreements between Pearson group companies) to ensure that your personal information is treated by third parties and other Pearson

companies in a way that is consistent with and which respects all applicable local and national laws, including, without limitation those in Canada, the EU and UK, on data protection. If you require further information about this, please contact the Data Privacy Office.

Data Security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We also have procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data Retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are available in our Data Retention Policy which is available from the Data Privacy Office.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you may have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected and to request confirmation that has been done
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it and to request confirmation when that has been done

- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- **Request the restriction** of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.
- **Object to processing** of your personal information by solely automated means if that processing results in a decision which could significantly affect you

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measures to ensure that personal information is not disclosed to any person who has no right to receive it.

Further questions or complaints

If you have any questions about this privacy notice or how we handle your personal information, please contact the Data Privacy Office. You have the right to make a complaint at any time to the information commissioner's office or the supervisory authority for data privacy issues in your country.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.