

Processing Your Personal Data - The Headlines

What categories of personal data does Prudential collect about me and why?

"Personal data" means any information relating to *you*. As your employer, Prudential will process your personal data for a range of different purposes. For example:

What personal data?	Why?
<ul style="list-style-type: none"> • Identification data e.g. name, employee ID • Personal information e.g. date of birth • Contact details e.g. home address • Information about your job e.g. job title • Pre-employment screening data e.g. credit checks • Salary and benefits e.g. base salary and bonus • Share plans e.g. number of shares held • Time and systems / building access information e.g. building card access, CCTV images • Performance, development and disciplinary information e.g. performance rating • Absence information e.g. holiday • Personal views and opinions, related to your employment • Organisational data e.g. cost centre allocations • Details of your next of kin and family information 	<ul style="list-style-type: none"> • To pay you • To administer and provide your benefits • To manage our workforce • To operate our IT systems and keep them secure • To comply with applicable laws and employment-related requirements • To ensure our employees are complying with Prudential policies and procedures • To communicate with you and with other Prudential employees and third parties • To communicate with your designated contacts in the case of an emergency • To comply with requests and legal demands from regulators or other authorities • To automate decision-making or in profiling • To comply with corporate financial responsibilities

It's important to know that Prudential may also need to process sensitive personal data about you such as health and medical data, criminal records data, race or ethnicity data, sexual orientation data and other information for equal opportunities monitoring.

Find out more about what data Prudential processes and why by reading the detailed **Employee Privacy Notice**

Who might Prudential share my personal data with, and what happens if it's transferred out of country of your location?

As you know, we are part of the Prudential Group - and entities across the Group are involved in processing data. We might also need to transfer your data to other third parties - e.g. other Prudential entities, potential business partners, acquiring entities, suppliers, customers, or government bodies. Our policy is to limit who has access to that data as much as we can. If we need to transfer data out of the country of your location, Prudential will take all necessary measures to ensure your data is adequately protected. Further information about who your data is shared with, and what steps we take to protect it, is set out in the detailed **Employee Privacy Notice**.

How long will Prudential keep my personal data for?

We won't keep it for any longer than is necessary, either to comply with the law or to ensure that we are complying with our obligations to you and other third parties.

What rights do I have in respect of my personal data?

You have a number of rights in relation to your data, depending on the country of your location. These may include a right to access, correct and erase your data as well as more technical rights to restrict the way we process it, and to transfer your data. Please refer to our **Employee Privacy Notice** for further details.

Who can I contact if I have questions?

If you have concerns or questions regarding your personal data, please contact your local data privacy team or Group Privacy team: Prudential plc, 1 Angel Court, London, EC2R 7AG, UK or 13/F One IFC, 1 Harbour View Street, Central, Hong Kong SAR contact at GHO.dataprotection@prudentialplc.com.



Prudential Employee Privacy Notice (August 2022)

Your Prudential employing company has prepared this Employee Privacy Notice ("**Notice**") to be provided to its employees. We need to process your personal data when we employ you. The purpose of this Notice is to give you information about how Prudential processes information about you, and your rights in relation to that information.

Prudential needs to process your personal data in order to enter into our contract of employment with you and to continue to perform crucial aspects of your contract of employment such as paying you and providing you with benefits. There are also statutory requirements and other contractual requirements we have to comply with in relation to your employment as well as business and operational needs we have to meet. If we are unable to carry out the processing activities we describe in this Notice, we may not be able to comply with your contract of employment, and in very exceptional cases, may not be able to continue your employment. Of course, we hope it would never come to that, and this is simply information we are obliged to provide to you as part of this Notice.

In certain limited circumstances, we may need to ask for your explicit consent to process your personal data in a particular way. Where we do so, you will be entitled to withdraw your consent at any time by contacting us as set out at the end of this notice. However, in most cases we will process it for the reasons set out in this Notice and it won't be appropriate or necessary for you to provide consent.

When we say "**Prudential**", "**we**" or "**us**" in this document, we mean your employing company within the Prudential Group. This is the entity with which you have an employment contract. "Prudential Group" refers to all Prudential entities globally under Prudential plc. Details of these can be requested by contacting us as stated below ("Who can I contact about this?"). As with many other Prudential policies, this document is not part of your contract of employment, and we may update it from time to time, for example if we require your personal data for additional purposes.

In this Notice you will see reference to "applicable laws" or "applicable data protection laws". That expression refers to the local laws in the country/region applicable to your employment.

What categories of personal data does Prudential collect about me, where is the personal data being collected from and why does Prudential use it?

"Personal Data" means any information relating to you. Prudential will process the following categories and types of personal data about you, also defined as "Employee Data":

- **identification data**, such as your name, signature, employee number, your photo, video recording, business email address, business address, business landline, citizenship, passport / visa data, drivers' licence information and national insurance number;
- **personal information**, such as your date and place of birth, emergency contact details and gender;
- **contact details**, such as your home address, telephone number and personal email address;
- **information about your job**, such as your position, job title, employee type, grade, time type (full or part time), working time information, work location, division, department, manager (name & employee number), start and end date, contract status, job history (including role history, title history, effective dates and past pay groups), education history and qualifications, worker history (including records of changes in HR databases) and reason for leaving;
- **pre-employment screening data**, such as information obtained through credit checks, references, resumes or CVs;
- **information about your salary and benefits**, such as your basic salary and bonus, salary increases (amounts and percentages), allowances, benefits (including information about you and your dependants that we provide to the benefit providers), pension plans, tax code, your bank account details and payment dates, accrued salary information, employee pay group, and information relating to your pension;
- **information about your share plans**, such as number of shares held, details of all restricted share plans or any other entitlement to shares awarded, cancelled, exercised, vested, unvested or outstanding in your favour;

- **time, and systems / buildings access monitoring information**, such as CCTV images, building card access, internet, work email and telephone usage data;
- **business travelling information**, such as date and time of travel, flight information, hotel accommodation;
- **performance, development and disciplinary information**, such as performance reviews and ratings, information about disciplinary allegations, the disciplinary process and any disciplinary warnings, details of grievances and any outcome;
- **absence information**, such as dates of leave of absence, holiday, maternity leave, paternity leave, adoption leave, shared parental leave, compassionate leave, confirmation of a birth of a child, study leave, family care leave, medical leave; and
- **personal views and opinions** related to your employment, such as views expressed and minuted in meetings;
- **organisational data** including employee number for IT systems, company details, cost centre allocations, and organisations;
- **next of kin and family information** including emergency contact details and certain related identification data, your marital status, information about your dependents and their stocks/shares holding.

We'll collect personal information from the following general sources:

- from you directly;
- information generated about you during the course of your application for employment or during the course of your employment with us;
- from a broker or other intermediary (for example, employment agencies and consultancies) who we work with;
- Prudential Group companies;
- cookies, location services, IP addresses when you visit our website or mobile app, or from any devices you own and use during the course of your employment;
- CCTV footage at office premises;
- questionnaire and contact details when you attend surveys or when you update contact us form on our website; and
- from other sources such as previous employers, educational establishments, fraud prevention agencies, credit reference agencies, other lenders, publicly available directories and information (for example, telephone directory, social media, internet, news articles), debt recovery and/or tracing agents, other organisations to assist in prevention and detection of crime, police and law enforcement agencies.

We collect and use this Employee Data for a variety of reasons linked to your employment. To help clarify these, we have set out below a list of reasons why we collect and use this data (the "**Processing Purposes**") along with examples of some of the Employee Data used for each of the Processing Purposes:

- **administering and providing compensation**, including payroll, expenses, bonus, share awards, and other applicable incentives which involves the processing of identification data, contact details, information about your job, reward package, performance and disciplinary information; managing your pension benefits during and post-employment; absence information and organisational data;
- **administering and providing applicable benefits and other work-related allowances**, including reporting of benefit entitlements and take-up of benefits which involves the processing of identification data, contact details, next of kin and family information, information about your job, reward package, performance and disciplinary information; absence information and organisational data;
- **administering our workforce and managing the employment relationship** including managing work activities, tracking working hours, tracking internet, email and telephone content and usage, providing performance evaluations and promotions, producing and maintaining organisational charts, Business Unit and intra Business Unit resourcing and team management, managing and monitoring business travel, carrying out workforce analysis, conducting workforce surveys, conducting talent management and career development, holiday management / approvals, providing references, dealing with grievances and disciplinary processes, and administering mandatory training which involves the processing of identification data, contact details, information about your job, reward package, performance and

disciplinary information; absence information; organisational data; and recruitment for other roles both during and after the end of your employment;

- **providing IT systems and support** to enable you and others to perform their work, to enable our business to operate, and to enable us to identify and resolve issues in our IT systems, and to keep our systems secure which involves processing almost all categories of Employee Data;
- **complying with applicable laws, regulatory (including HKIA and any relevant local regulatory authorities), and employment-related requirements** along with the administration of those requirements, such as income tax, national insurance deductions, insurance, health and safety, employment and immigration laws, and laws relating to sanctions, which involves the processing of identification data, contact details, emergency contact details, information about your job, reward package, performance and disciplinary information; absence information and organisational data;
- **monitoring and ensuring compliance with applicable policies and procedures and laws**, including conducting internal investigations, which involves the processing of identification data, contact details, next of kin and family information, information about your job, reward package, performance and disciplinary information; absence information and organisational data; and conducting conflict checks using family information;
- **communicating with you, other Prudential employees and third parties** (such as existing or potential business partners, suppliers, customers, end-customers or government officials) which involves the processing of identification data, contact details, information about your job and organisational data;
- **communicating with your designated contacts in the case of an emergency** which involves the processing of contact details, next of kin and family information, information about your job and organisational data;
- **responding to and complying with requests and legal demands from regulators (including HKIA and relevant local regulatory authorities) or other authorities or law enforcement agencies** in or outside of your home country which involves the processing of identification data, contact details, information about your job, reward package, performance and disciplinary information; absence information and organisational data;
- **in automated decision-making or profiling**, such as job suitability and job and assignment matching;
- **complying with corporate financial responsibilities**, including audit requirements (both internal and external) and cost / budgeting analysis and control which involves the processing of identification data, contact details, information about your job, reward package, performance and disciplinary information; absence information and organisational data.

In addition to the collection, processing and use of the Employee Data, Prudential processes the following special categories of personal information about you which we describe as "**Sensitive Employee Data**":

- **health and medical data**, such as the number of sick days and the information contained in a doctor's certificate / occupational health report for purposes of salary payment, workforce planning and analysis, and compliance with legal obligations; information on work-related accidents for purposes of insurance compensation, work safety and compliance with legal obligations (such as reporting obligations); information on disability for purposes of accommodating the work place and compliance with legal obligations; information on maternity leave / adoption leave / shared parental leave for purposes of workforce planning and compliance with legal obligations;
- **criminal records data**, in the event that Prudential has conducted pre-employment or annual screening checks and received the results of criminal records background checks in relation to you where relevant and appropriate to your role;
- **race or ethnicity data** such as information contained in your passport or other citizenship and right to work documentation, and information which you have voluntarily provided to Prudential for the purposes of our equal opportunities and diversity monitoring and initiatives;
- **sexual orientation data** such as marital status and information contained in your marriage / civil partnership certificate for the purpose of administering name changes, and, where this has been provided voluntarily to Prudential for the purposes of our equal opportunities and diversity monitoring and initiatives;
- and in certain countries, **financial information** and **national identifiers**.

Why does Prudential need to process my Employee Data and Sensitive Employee Data?



Both Employee Data and Sensitive Employee Data are needed by Prudential to carry out a variety of activities that are linked to your employment and Prudential's compliance with its obligations as a result of employing you and as a business.

Depending on your country of location, we are required to explain to you the legal bases for our collecting, processing and use of your Employee Data and Sensitive Employee Data. We have a number of these listed below:

For Employee Data, our legal bases are:

- performance of the contract of employment with you; compliance with legal obligations, in particular in the area of labour and employment law, social security and protection law, data protection law, tax law, and corporate compliance laws; the legitimate interests of Prudential, Prudential affiliates or other third parties (such as existing or potential business partners, suppliers, customers, end-customers or governmental bodies or courts); your consent, where that is appropriate, meets the requirements of applicable data protection law and has been separately obtained; protection of vital interests of you or of another individual; performance of a task carried out in the public interest or in the exercise of official authority vested in Prudential.

For Sensitive Employee Data, our legal bases are:

- explicit consent as allowed by applicable data protection laws; to carry out the obligations and to exercise the specific rights of Prudential or you in the field of employment and social security and social protection law as permitted by applicable data protection laws and / or a collective agreement; to protect the vital interests of you or of another individual where you are physically or legally incapable of giving consent; public data as made public manifestly by you; to establish, exercise or defend a legal claim or whenever courts are acting in their judicial capacity; for substantial public interest as permitted by applicable data protection laws; for assessment of the working capacity of the employee as permitted by applicable data protection laws.

We appreciate that there is a lot of information there, and we want to be as clear with you as possible over what this means. Where we talk about legitimate interests of Prudential or third parties, this can include:

- Implementation and operation of a Group-wide organisational structure and Group-wide information sharing;
- Right to freedom of expression or information;
- Customer Relationship Management and other forms of marketing;
- Prevention of fraud, misuse of company IT systems, or money laundering;
- Operation of a whistleblowing scheme;
- Physical security, IT and network security;
- Internal Investigations;
- Proposed mergers and acquisitions.

When relying on the legitimate interests basis for processing your personal data, we will balance the legitimate interest pursued by us and any relevant third party with your interest and fundamental rights and freedoms in relation to the protection of your personal data to ensure it is appropriate for us to rely on legitimate interests and to identify any additional steps we need to take to achieve the right balance.

Who might Prudential share your personal information with?

As you know, we are part of the Prudential Group of companies, and several entities in this Group are involved in the Processing Purposes. To ensure that the Processing Purposes can be completed, your information may be shared with any of the entities within the Prudential network. Where we do share data in this way, it is our policy to limit the categories of individual who have access to that personal information.

Prudential may transfer personal data to third parties, including to entities within and outside the Prudential Group located in any jurisdictions where Prudential Group entities are located, for the Processing Purposes as follows:

- **Within the Prudential Group.** As your employing company is part of a wider Group that has dual headquarters in the UK and Hong Kong SAR, with offices located across the globe, Prudential may transfer Employee Data and Sensitive Employee Data to, or otherwise allow access to such data by other entities within the Prudential Group, which may use, transfer, and process the data for the following purposes: to maintain and improve effective administration of the workforce; to communicate information about the Prudential Group; to maintain a corporate directory; to maintain IT systems; to monitor and assure compliance with applicable policies and procedures, and applicable laws; and to respond to requests and legal demands from regulators and other authorities.
- **Communication with third parties.** As necessary in connection with business operations, work contact details and communication contact details may be transferred to existing or potential business partners, suppliers, customers, end-customers or government officials and other third parties.
- **Regulators, authorities, and other third parties.** As necessary for the Processing Purposes described above, personal information may be transferred to regulators, courts, and other authorities (e.g. tax and law enforcement authorities), independent external advisors (e.g. auditors), Directors within the Prudential Group, insurance providers, pensions and benefits providers, internal compliance and investigation teams (including external advisers appointed to conduct internal investigations).
- **Acquiring entities.** If the Prudential business for which you work may be sold or transferred in whole or in part (or such a sale or transfer is being contemplated), your personal data may be transferred to the new employer or potential new employer as part of the transfer itself or as part of an initial review for such transfer (i.e. due diligence), subject to any rights provided by applicable law, including jurisdictions where the new employer or potential new employer are located.
- **Data processors.** As necessary for the Processing Purposes described above, personal data may be shared with one or more third parties, whether affiliated or unaffiliated, to process personal information under appropriate instructions ("**Data Processors**"). The Data Processors may carry out instructions related to workforce administration, IT system support, payroll and compensation, travel arrangements, training, compliance, and other activities, and will be subject to contractual obligations to implement appropriate technical and organisational security measures to safeguard the personal information, and to process the personal information only as instructed.

For a full list of the Prudential Group entities and third parties that we may share your data with, please contact us as set out below to request the Record of Processing.

As you may expect, some of the recipients we may share Employee Data and Sensitive Employee Data with may be located in countries outside of the country of your location.

Some countries where recipients are located have already been assessed by your respective government and the privacy commissioner or authority as ensuring an adequate level of protection for this data or approved by the relevant authority for the transfer of personal data.

If recipients are located in other countries that are not deemed to ensure adequate protections for personal data by your respective authority, Prudential will take all necessary measures to ensure that transfers are adequately protected as required by applicable data protection law. This may include (without limitation) using appropriate safeguards such as any applicable model data protection clauses which your respective privacy commissioner or authority has assessed as providing an adequate level of protection for personal data. You can ask for a copy of the appropriate safeguards by contacting us as set out below ("Who can I contact about this?").

How long will Prudential keep my personal information for?

It is our policy not to keep personal information for longer than is necessary. We may, for example, keep your personal information for a reasonable time after you have left to ensure that Prudential has the records it needs in the event of a dispute or regulatory investigation and to ensure that any ongoing obligations can be complied with and, such as complying with requests from regulators or to contact you about future work opportunities at



Prudential. Where personal information is kept, that period will be determined based on the applicable local law. For further information regarding retention, please contact us as set out below.

What rights do I have in respect of my personal information?

Depending on the country of your location, you may have a number of rights in relation to your Employee Data and Sensitive Employee Data. There are exceptions and limitations to these rights, and the rights can be summarised in broad terms as follows:

(i) Right of access

You have the right to confirm with us whether your personal data is processed, and if it is, to request access to that personal data including the categories of personal data processed, the purpose of the processing and the recipients or categories of recipients. We do have to take into account the interests of others though, so this is not an absolute right, and if you want to request more than one copy we may charge a fee.

(ii) Right to rectification

You may have the right to rectify inaccurate or incomplete personal data concerning you.

(iii) Right to erasure (right to be forgotten)

You may have the right to ask us to erase personal data concerning you. if it is no longer needed for the Processing Purposes and if there is no other legal basis for the processing.

(iv) Right to restriction of processing

In limited circumstances, you may have the right to request that we restrict processing of your personal data, however where we process Employee Data and Sensitive Employee Data for the Processing Purposes we think that we have a legitimate interest in processing that day which may override a request that you make.

(v) Right to data portability

You may have the right to receive personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you may have the right to transmit that data to another entity.

(vi) Right to object and rights relating to automated decision-making

Under certain circumstances you may have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data, including profiling, by us and we can be required to no longer process your personal data. This may include requesting human intervention in relation to an automated decision so that you can express your view and to contest the decision.

To confirm the rights which apply to you or exercise any of these rights, please contact us as stated below (“Who can I contact about this?”).

Why does Prudential need my next of kin and family information?

We need the personal data of your next of kin for emergency contact reasons; and of your family members in order to provide benefits. We also need family information for compliance with certain Prudential’s policies and procedures, such as conflict of interests checks. Please ensure that you have your family member’s authority for us to use their personal data as set out in this Notice. By providing us with your family member’s personal data, you will be deemed to have obtained that authority for us to process their personal data.

If for any reason you are concerned about whether you are permitted to provide us with your family information, please contact us using the contacts provided in “Who can I contact about this?”.

Who can I contact about this?

If you have concerns or questions regarding this Notice, including the rights specific to your country of location, or if you would like to exercise your rights as a data subject, you can contact your local data privacy team or Group Privacy team:

Group Privacy, 4th floor, 1 Angel Court, London, EC2R 7AG; or 13/F One IFC, 1 Harbour View Street, Central, Hong Kong SAR

GHO.dataprotection@prudentialplc.com

Depending on your country of location, you may have the right to lodge a complaint with the competent data protection supervisory authority in your own country.