

Privacy Notice

GENERAL

We are Rheinmetall BAE Systems Land Limited (company number 00414948), also referred to as RBSL ("we" "us" "our"). For the purposes of data protection legislation, we are the data controller. We are committed to protecting and respecting your privacy.

We will process your personal information in accordance with the UK GDPR and national laws which relate to the processing of personal information, including the UK Data Protection Act 2018 and EU General Data Protection Regulations ((EU) 2016/679). Please read the following carefully to understand our practices regarding your personal information and how we will manage it.

This Privacy Notice explains:

- Why and how we may use the personal information that we have obtained from interactions you (or others) may have with us as a business, including when you visit and use our website currently located at <https://rbsl.com> (the "Website") or when you contact us;
- How your privacy is safeguarded in the course of our relationship with you;
- With whom we share your personal information; and
- The rights you have in connection with the information we use.

Not all the sections in this Notice will be relevant to everyone. The mere presence of an activity or section in this Notice does not mean that we are processing your personal information in this manner.

If you are not satisfied with the level of information provided in this Notice, you can ask us about your personal information using the contact details at the end of this Notice.

PERSONAL INFORMATION WE COLLECT ABOUT YOU

When you engage with us we may collect personal information and special category personal information about you, including:

- Business information – your business contact details (address, telephone number, email address), job title, employer and any other relevant information;
- Contact information – your name, email address, phone number, postal address, social media handles and other information that enables us to contact you;
- Employment information – your business information, employee ID and system IDs, references, vehicle registration number, and other information relating to your employment such as qualifications and experience;
- Enquiry information – information included within and relating to your contact/enquiry;

- Financial information – your bank account information, tax information, information about third party recipients of benefits, payment or other information required when you send or receive payment;
- HR processes information – allegations, investigations and outcomes, feedback, performance reviews (formal and informal), flexible working processes, health and safety audits, risk assessments, medical assessments and reports, incident reports and training;
- Identity verification – your government issued ID, date of birth, previous address history, signature and other information collected for identity verification;
- Monitoring Data – CCTV footage, system and building access records, data related to IT security, and your image, voice, name, email and chat messages may be recorded during internal and external video conference calls;
- Next of Kin/Dependents – information about others including your emergency contact, next of kin and dependents;
- Survey response information – your response(s) to our surveys;
- Vetting and Immigration– name, address, nationality, second nationality, national ID number, financial data, criminal history, immigration status, proof of identity, results of checks;
- Website information - data that you provide by filling in forms on the Website; if you contact us, in writing, by email or other electronic means through the Website, we may keep a record of that correspondence and details of your visits to the Website; and
- Whistleblowing/ EQS Integrity Line – your name, email address, phone number, nature of report;

PERSONAL INFORMATION WE COLLECT ABOUT YOU FROM OTHER SOURCES

In addition to the personal information that you provide to us, we may generate some further personal information internally. This will usually be generated by HR, line management, occupational health and safety, as appropriate.

In some circumstances, data may be collected from monitoring devices or other means (as detailed in 'Monitoring Data' above) as permitted by applicable laws. In these instances, the data may be collected by us or a third party service provider on our behalf.

We may also obtain information from third parties:

- Compliance Checks – information received following anti-bribery and corruption checks;
- Employment Reference - references received from your previous employer;
- Legal services – information relating to claims.
- Medical Services – medical reports and assessments from external professionals;
- Supplier or Customer – information received about supplier or customer employees;
- Tax and Benefits - information from tax authorities, benefit providers; and
- Vetting and Background Checks – security vetting and background checks (where permitted by applicable laws).

HOW AND WHY WE USE YOUR PERSONAL INFORMATION

We are bound to certain lawful bases for processing personal information as a data controller. The purposes for which we use your personal information and the lawful grounds on which we rely to process it for each purpose is as follows:

Lawful Basis	Activities Covered
To perform a contract to which you are a party or to take steps prior to entering into a contract	<ul style="list-style-type: none"> To fulfil an employment/supplier/sales contract, we need to gather relevant information related to those contracts for there to be an agreement between you and us.
To comply with our legal obligations	<ul style="list-style-type: none"> To keep a record relating to the exercise of any of your rights relating to our processing of your personal information. To take any actions to comply with our legal obligations relating to accounting, tax and employment liability or any other relevant legislation or regulation.
Necessary for our legitimate interests	<ul style="list-style-type: none"> To fully assess applications for employment. To manage and protect our workforce. To manage and protect our assets, systems and business operations. To manage and protect third parties who interact with us. To promote our business activities. To provide you with an employment related benefit, we may process your data and share it with benefit providers so as to offer benefits to our employees. To provide you with a service or benefit related to your employment with us, for example to external IT support functions.

Special Category personal information means any personal information relating to your health, genetic or biometric data, criminal convictions, sex life, sexual orientation, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership.

To use your special categories of personal information we need to ensure that we have a particular reason to do so, in addition to the general lawful grounds outlined above.

Additional Legal Basis	Activities Covered
To carry out our employment law obligations	<ul style="list-style-type: none"> Any activity to comply with obligations under employment, tax and health and safety law.

Needed for occupational medicine	<ul style="list-style-type: none"> Preventive or occupational medicine, medical diagnosis or assessment of working capacity.
Necessary for substantial public interests	<ul style="list-style-type: none"> Vetting and background checks. Right to work and immigration checks.
To protect your life or the life of another	<ul style="list-style-type: none"> Medical emergency.
Needed for legal claims	<ul style="list-style-type: none"> Establishment, exercise or defence of legal claims.

DISCLOSING YOUR PERSONAL INFORMATION TO THIRD PARTIES

Your personal information may be accessed or shared internally on a need to know basis. This may include system administrators and local and executive management and departments who may be responsible for making decisions or involved in a process concerning your relationship with us.

We may disclose your personal information to third parties if:

- We are under a duty to disclose or share your personal information to comply with a legal obligation or apply our legal rights (law enforcement, legal advisors or regulatory bodies)
- They provide services to us connected with your relationship with us

In the event we share your personal information with third parties, we will only provide them what is necessary for them to complete their task or provide the service in question. In situations where personal information is shared, we will ensure there are sufficient protections in place and where necessary a processing agreement between the parties.

Where you ask us to rectify, erase or restrict the processing of your information, we take reasonable steps to pass this request on to any such third parties with whom we have shared your personal information.

INTERNATIONAL TRANSFERS

We share your personal information with our shareholder companies. Some of the people who access your personal information may not be in the same country as you.

Where permitted by applicable law, we may transfer your personal information to the EU and other jurisdictions outside the UK for the purposes set out in this Privacy Notice and our [Cookie Policy](#). We will implement appropriate safeguards to ensure the secure transfer of your personal information to jurisdictions outside the UK. These safeguards include:

- relying on declarations made by regulators or governments that the recipient country is recognised as providing an appropriate level of protection (e.g. adequacy decisions/regulations);
- where the country the data is being sent to is not subject to such declaration, the standard contractual clauses approved by relevant regulators or governments, as applicable;
- ensuring that the recipients are subscribed to international frameworks; or
- such alternative measures as are valid and appropriate at the time.

Any requests we receive from law enforcement or regulators will be carefully assessed before personal information is disclosed.

DATA RETENTION

If we collect your personal information, the length of time for which we retain it is determined by the purpose for which we use that information and our obligations under other laws. We do not retain personal information in an identifiable format for longer than is necessary.

We maintain policies governing the creation, retention and disposal of records in our care.

In some circumstances we may retain your personal information for a longer period of time than is needed for its original purpose. For example, where we are required to for legal, tax or accounting requirements, to establish, bring or defend legal claims or to maintain records in the event of any complaints or challenges.

DATA SECURITY

We have implemented appropriate physical, technical and organisation measures to ensure that your personal information is secure from accidental loss and unauthorised access, use, alteration or disclosure. Internally, access to personal information is always limited only to people or parties that have a legitimate business need for accessing. All employees are subject to confidentiality clauses in employment contracts and receive regular data protection training.

COOKIES

'Cookies' are small pieces of information sent to your computer or device and stored on its hard drive to allow the Website to recognise you when you visit it. The Website uses cookies to obtain an overall view of visitor habits and visitor and user volumes to the Website.

If you are using the Website, it is possible to switch off cookies by setting your browser preferences. For more information on how we use cookies and how to switch them off on your device, please visit our [Cookie Policy](#).

YOUR RIGHTS

You have a number of rights in relation to your personal information under data protection law. In relation to certain rights, we may ask you for information to confirm your identity and, where applicable, to help us to search for your personal information. Except in certain circumstances permitted under applicable regulatory guidance, we will respond to you within one calendar month from either:

- The date that we have confirmed your identity; or
- Where we do not need to do this because we already have this information, from the date we received your request.

We will always let you know if we think a response will take longer than one month.

We will not ask for a fee, unless we think your request is unfounded, repetitive or excessive. Where a fee is necessary, we will inform you before proceeding with your request.

You have the following rights, some of which may only apply in certain circumstances:

Your Rights	Further Information
The right to rectification of data not accurate or up to date	<p>We aim to ensure that all personal information is correct. You have a responsibility to ensure that you notify us of any changes to your personal information.</p> <p>You have the right to request correction of any inaccurate data relating to you. We may seek to verify the accuracy of the personal information before rectifying it.</p> <p>We do not always need to comply with your request but, if this is the case, we will ensure this is explained to you.</p>
To withdraw your consent to processing your personal information	<p>Where we rely on your consent as the lawful basis for processing your personal information, you may withdraw your consent at any time by contacting us using the details at the end of this Privacy Notice. If you withdraw your consent, our use of your personal information before you withdraw is still lawful.</p>
To restrict processing of your personal information	<p>You may ask us to restrict the processing of your personal information in the following situations:</p> <ul style="list-style-type: none"> • where you believe it is unlawful for us to do so; or • you have objected to its use and our investigation is pending; or • you require us to keep it in connection with legal proceedings. <p>In these situations, we may only process your personal information whilst its processing is restricted if we have your consent or are legally permitted to do so, for example for storage purposes, to protect the rights of another individual or company or in connection with legal proceedings.</p>
To have your personal information erased	<p>You may ask for your personal information to be removed from our systems by contacting us using the details at the end of this Privacy Notice. Unless there is a reason that the law allows us to use your personal information for longer (e.g. there is a legal requirement for us to retain your personal information, or we have an overriding legitimate reason to continue to retain your personal information), we will make reasonable efforts to comply with your request.</p> <p>If we cannot comply with your request, this will be explained to you.</p>
To request access to your personal information and how we process it	<p>You have the right to ask for a copy of the information that we hold about you by contacting us using the details at the end of this Privacy Notice. We may not provide you</p>

Your Rights	Further Information
	<p>with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information.</p> <p>If we cannot comply with your request, this will be explained to you.</p>
<p>To electronically move, copy or destroy your personal information in a standard, machine-readable form (data portability)</p>	<p>Where we rely on your consent as the lawful basis for processing your personal information or need to process it in connection with a contract in place directly with you, you may ask us to provide you with a copy of that information in a structured data file. We will provide this to you electronically in a structured, commonly used and machine readable form. You can ask us to send your personal information directly to another service provider, and we will do so if this is technically possible. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information.</p>
<p>To complain to a data protection regulator</p>	<p>You have the right to complain to a data protection regulator (which in the UK is the Information Commissioner's Office (ICO)) if you are concerned about the way we have processed your personal information. Please visit the ICO's website for further details.</p>

CHANGES TO OUR PRIVACY NOTICE

We may update this privacy notice from time to time, and any changes we make to our privacy notice will be posted on this page. Please check periodically for any updates.

This notice was last updated on 27/11/2023.

CONTACT US

If you have any questions, comments or requests regarding this notice or how we use your personal information please contact Compliance@RBSL.com