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# Internal Privacy Notice

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## Policy Statement

Britvic PLC and its group companies ("we" or "us") is, in relation to certain types of personal data, a "data controller" and we have issued this Privacy Notice (this "notice") to describe how we hold and use personal data about you. To view the list of Britvic companies that are considered 'data controllers' please go to Appendix 2.

We respect the privacy rights of individuals and are committed to handling personal data responsibly and in accordance with applicable Data Protection Laws (such as the General Data Protection Regulation (GDPR), Data Protection Act (DPA)) and all other associated laws and regulations which says that the personal data we hold about you must be:

- used lawfully, fairly and in a transparent way;
- collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- relevant to the purposes we have told you about and limited only to those purposes;
- accurate and kept up to date;
- kept only as long as necessary for the purposes we have told you about; and
- kept securely.

This notice sets out the personal data that we collect and process about you, the purposes of the processing and the rights that you have in connection with it.

## Who does it apply to?

This notice describes how we handle personal data that we hold about our employees, workers (temporary and permanent), contractors, consultants, secondees, interns and other third parties engaged to carry out work for us and who have access to our premises or our internal systems.



## Notice Detail - What do I need to know or do?

In this notice we explain:

- what the key terms "personal data", "special category personal data" and "processing" mean;
- why we process your personal data;
- where the data comes from;
- how long we keep your personal data;
- the legal grounds which allow us to process your personal data;
- our approach to automated decision making
- how we ensure your personal data is secure;
- who gets to see your personal data;
- how to access your personal data and other rights you have; and
- who to contact if you have any questions or want to make a complaint.

### What is "personal data"?

"Personal data" is any information about you from which you can be identified. It includes not only facts about you, but also intentions and opinions about you. It does not include data where your identity has been removed (i.e. anonymous data).

### What is "special category personal data"?

"Special category personal data" is a sensitive type of personal data which requires a higher level of protection, namely:

- information about your race or ethnicity, religious beliefs, sexual orientation and political opinions;
- trade union membership;
- information about your health, including any medical condition, health and sickness records;
- genetic information and biometric data; and
- information about criminal convictions and offences.

### What is "processing"?

"Processing" means doing anything with the data. For example, it includes collecting it, holding it, disclosing it and deleting it.



## Why do we process your personal data?

There are various reasons why we need to process your personal data for the purpose of our business, including management, administrative, employment and legal purposes. A non-exhaustive list of the purposes for which we will process your personal data is set out in Appendix 1 to this notice.

## Where does the data come from?

When you start working with us, the initial personal data about you that we process is likely to come from you: for example, contact details, bank details and information on your immigration status and whether you can lawfully work. We may also, where necessary, require references and information to carry out background checks. Further details can be found in local Recruitment Privacy Notices.

In the course of your engagement with us, you may be required to provide us with information for other purposes such as discretionary or statutory sick pay and family rights (e.g. maternity and paternity leave and pay). If you do not provide information (or exercise your right to erasure) that you are required by law or contract to give us, you may lose benefits or we may decide not to employ you or to end your contract. If you have concerns about this in a particular context, you should contact HR Services.

In the course of your work, we may receive personal data relating to you from others. Internally, personal data may be derived from your managers and other colleagues or our IT systems; externally, it may be derived from our suppliers, customers, or those to whom you communicate by email or other systems.

## How long do we keep your personal data?

We will only retain your personal data 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 types of personal data set out in our Document Retention Policy.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Once you no longer work with us, we will retain and securely destroy your personal information in accordance with our Document Retention Policy.



## What is the lawful basis for processing “personal data”?

Our lawful basis for collecting and using your personal data will depend on the personal information concerned and the specific context in which we collect it, but we will rely on one or more permitted lawful grounds as laid down by the relevant data protection law or regulation, as summarised and explained in the table below:

Lawful basis for processing	Explanation
<b>Consent</b> - You have given specific consent to us processing your data	In general, the processing of your personal data in connection with your employment/service contract does not require your consent. However, there may be occasions where we request your specific consent to process your personal data
<b>Contract</b> - The processing is necessary for the performance of a contract with you or to take steps at your request to enter a contract	This covers carrying out our contractual duties and exercising our contractual rights
<b>Legal obligation</b> - The processing is necessary to comply with our legal obligations	Ensuring we perform our legal and regulatory obligations. For example, providing a safe place of work, providing data to HMRC, Revenue (or any other local or national tax authorities as applicable), and avoiding unlawful discrimination
<b>Legitimate interests</b> - The processing necessary for our (or a third party's) legitimate interests	We or a third party have legitimate interests in carrying on, managing and administering our respective businesses effectively and properly and in connection with those interests, processing your data. Your data will not be processed on this basis if our (or a third party's) interests are overridden by your own interests, rights and freedoms
<b>Vital interests</b> – The processing is necessary to protect someones life	This basis would only be relied upon when there if we need to process personal data to protect someones life, such as if you are involved in a serious accident at work



If you have questions about or need further information concerning the lawful basis on which we process your personal information, please contact Britvic's Data Protection Officer.

## What is the lawful basis for processing “special category personal data”?

As explained above, special category personal data requires a higher level of protection than normal personal data. In addition to the grounds for processing normal personal data already mentioned, we also need to have further justification for collecting, storing and using this type of personal data. Those further justifications include:

- where we have your explicit consent;
- where we need to carry out our legal obligations or exercise rights in connection with employment;
- where we need a medical diagnosis, and / or assessment of your working capacity; or
- where it is necessary for reasons of substantial public interest, such as for equality and diversity monitoring.

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, or where you have already made the information public (e.g. if you tell colleagues that you are ill).

We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing special category personal data.

Here are some examples of the ways we may use your special category personal data:

- 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, nationality or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting; and



- 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.

## Further information on the personal data that we process

Further information on the types of personal data we may process in relation to you, the purpose for which that data may be processed and the lawful grounds for such processing is set out in Appendix 1 to this notice.

## Who gets to see your data?

### Internal use

Where necessary and as set out in this privacy notice, your personal data will be shared with your managers, HR and administrators for employment, administrative and management purposes as mentioned in this document.

We will where necessary and as set out in this privacy notice also share your personal data with other members of our Britvic group of companies around the world in order to administer human resources, staff member compensation and benefits at an international level on the HR System, as well as for other legitimate business purposes such as IT services/security, tax and accounting, and general business management.

### External use (sharing outside of the Britvic group)

In addition, we will share your personal data with certain organisations outside the Britvic group who provide services to us. For example, some personal data will be disclosed to our employee pension and benefit plans service providers and organisations who provide us with satisfaction surveys, payroll support services, relocation, tax and travel management services, as well as the providers of our IT services and systems. All of our service providers are required to take appropriate security measures to protect your personal data in line with our policies.

We will only share your personal data with organisations outside the Britvic group if that disclosure is consistent with a ground for processing on which we rely and doing so is lawful and fair to you. Generally, we will do so where it is necessary for our legitimate interests as an organisation or the interests of a third party (but we will not do this if these interests are over-ridden by your interests and rights in particular to privacy).



Sometimes we may disclose personal information to organisations outside the Britvic group on other lawful grounds, such as:

- to comply with our legal obligations, including where necessary to abide by law, regulation or contract, or to respond to a court order, administrative or judicial process, including, but not limited to, a subpoena, government audit or search warrant;
- in response to lawful requests by public authorities (including for national security or law enforcement purposes);
- as necessary to establish, exercise or defend against potential, threatened or actual litigation;
- where necessary to protect the vital interests of you or another person;
- in connection with the sale, assignment or other transfer of all or part of our business; and/or
- with your consent.

## Data Security

We have put in place measures to protect the security of your data. Details of these measures are set out in our IT Policy which is available on Focus.

Third parties will only process your personal data on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures are also set out in our IT Policy.

We have put in place 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.

## Transfers of personal data outside the European Economic Area (EEA)

We may transfer some of the personal data we collect about you to the following countries and territories outside the EEA: The United States of





America, Canada, India, Singapore, Hong Kong, South Africa, Australia and Malaysia.

There is an adequacy decision by the European Commission in respect of Canada (commercial organisations), meaning that commercial organisations within Canada to which we transfer your data are deemed to provide an adequate level of protection for your personal data.

There is not an adequacy decision by the European Commission in respect of the other countries and territories listed above, meaning that those countries are not deemed to provide an adequate level of protection for your personal data.

However, to ensure that your personal data does receive an adequate level of protection, we have put in place standard contractual clauses, to ensure that your personal data is treated in a way that is consistent with and which respects UK and EU laws on data protection. If you require further information about these protective measures, you can request it from Britvic's Data Protection Officer.

## Access to your personal data and your other data rights

We try to be as open as we reasonably can about personal data that we process. If you would like specific information, just ask our HR Services or Britvic's Data Protection Officer.

## Your data rights

You have the right:

- to ask us for copies of your personal data (right to access);
- to ask for inaccurate personal data to be corrected or made complete (right to rectification);
- to ask for your personal data to be deleted (right to erasure);
- to ask us to limit the way we use your personal data if you are concerned about its accuracy or how it is used (right to restriction of processing);
- to object to us using your personal data where we are using it for ours or a third party's legitimate interests, or where we are using it for direct marketing (right to object);
- to ask us to transfer your personal data to another data controller (right to data portability);
- not to be subject to a decision based solely on automated processing, including profiling;



- to withdraw consent at any time (to the extent that we rely on it as a basis for processing); and
- to complain to a supervisory authority. Local supervisory authorities are listed in Appendix 3

In the event of a concern about how your personal data are being handled, you are asked first to raise that concern with us by HR Services or Britvic's Data Protection Officer.

Please note that many of these rights are not absolute – the extent to which they apply may vary depending on the particular circumstances and any applicable exemptions. It means that in some situations we may not comply with your request.

## How to exercise your data rights

You may exercise your data rights (as summarised above) as follows:

- if you wish to access, correct, update or request deletion of your personal information, you can do so at any time by contacting HR Services;
- in addition you can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information by contacting HR Services; and
- if we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent. To withdraw your consent, please contact HR Services.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws, as outlined in our Data Subject Rights Handling Guidance which is available on Focus.

## Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current, so please let us know if your personal information changes during your working relationship with us.

## What happens if I don't follow this policy?



It is our personal responsibility to do the right thing for ourselves, for each other, and for Britvic. This behaviour is the beating heart of our “We Own It” value. Not doing the right thing or asking for support, could impact your myPerformance end of year rating, and any potential breach may lead to disciplinary action being taken.

## Status and Updates to this Notice

This notice does not form part of your contract of employment or other contract to provide services and it does not create contractual rights or obligations.

This notice may be updated from time-to-time to reflect any necessary changes in our privacy practices.

In such cases, we will inform you via Focus or another appropriate communication method. We encourage you to check back periodically in order to ensure you are aware of the most recent version of this notice.

## Related Documents

- Local Staff Handbooks
- Recruitment Privacy Notices
- Data Privacy and Personal Information Policy
- Data Subject Rights Guidance
- Document Retention Policy
- IT Policy
- Major Business Incident Management Policy

## Questions or Complaints

If you have any questions related to this notice, you can either raise this with your line manager or HR Services via [askHR](#) (please select GDPR General category).

If you have complaints relating to our processing of your personal data, you should raise these with our Data Protection Officer at [DataPrivacy@britvic.com](mailto:DataPrivacy@britvic.com). You also have the right to raise a complaint with your local supervisory authority for data protection issues, or any other local or national body responsible for regulating data protection.



## Appendix 1 - Further information on the personal data that we process and our purposes

The examples in the below table cannot, of course, be exhaustive. For example, although the table does not mention data relating to criminal offences, if we were to find out that someone working for us was suspected of committing a criminal offence, we will process that information if relevant for our purposes. If necessary we will also require criminal background checks for certain roles.

Purpose	Examples of personal data that may be processed	Lawful basis for processing
Recruitment, background checks, onboarding and emergency contact information	Name, contact details (address, email, telephone number), date of birth, emergency contact information / next of kin, NI number, education and training, CV, references, work permit, sickness and health information, ID such as passport and driving licence, racial / ethnic origin and Trade Union membership	<ul style="list-style-type: none"> <li>• Legitimate interests</li> <li>• Legal obligation</li> </ul>
Entering into the contract and terminating the contract	Name, contact details, date of birth, NI number, providing references, employment status, work permit, sickness and health information, passport / driving licence, criminal background and contractual terms	<ul style="list-style-type: none"> <li>• Legitimate interests</li> <li>• Legal obligation</li> <li>• Contract</li> </ul>
Training and performance including succession and talent records	Name, contact information, training and performance management records (myPerformance), personal opinion, employment status, contractual terms including Band	<ul style="list-style-type: none"> <li>• Legitimate interests</li> <li>• Contract</li> </ul>



Compensation and benefits, including pension	Name, contact information, date of birth, NI number, bank account information, employment status, sickness records, salary and bonus information, pension and benefits schemes	<ul style="list-style-type: none"> <li>• Legitimate interests</li> <li>• Legal obligation</li> <li>• Contract</li> </ul>
Processing payroll, administration and record-keeping	Name, contact information, employment status, bank account information, sickness, salary, bonus and pension information, benefit schemes and leave information (e.g. parental leave, annual leave)	<ul style="list-style-type: none"> <li>• Legitimate interests</li> <li>• Legal obligation</li> <li>• Contract</li> </ul>
Health information	Name, contact information, health information including occupational health reports and return to work plans, employment status, sickness absence and reasonable adjustments	<ul style="list-style-type: none"> <li>• Consent</li> <li>• Legitimate interests</li> <li>• Legal obligation</li> </ul>
Disciplinary and grievance (internal complaint) processes	Name, contact and employment information, disciplinary and performance management records, complaint records and relevant investigations (which may include CCTV monitoring data)	<ul style="list-style-type: none"> <li>• Legitimate interests</li> <li>• Legal obligation</li> <li>• Contract</li> </ul>
Equal opportunities, diversity monitoring	Name, racial/ethnic origin, age range, gender, sexual orientation, religion, disability, gender identity	<ul style="list-style-type: none"> <li>• Consent</li> <li>• Legitimate interests</li> <li>• Legal obligation</li> </ul>
Disputes and legal proceedings	Name, contact information, employment status, dispute and litigation records	<ul style="list-style-type: none"> <li>• Legitimate interests</li> <li>• Legal obligation</li> </ul>
Employee feedback (including engagement surveys and exit interviews)	Name, contact and employment information, employment status, date of birth, personal opinion and information from you	<ul style="list-style-type: none"> <li>• Consent</li> <li>• Legitimate interests</li> </ul>



	about your experiences of working for us	
People analytics – to measure key HR metrics	Name/identifier, gender, employment status, contractual terms including Band	<ul style="list-style-type: none"> <li>• Legitimate interests</li> </ul>
CCTV monitoring, access and system usage and security	Site CCTV for security purposes and in the event of an incident, records of the use of electronic access systems and records of your use of our systems including computers, internal-facing websites and digital platforms, phones and other devices and passwords	<ul style="list-style-type: none"> <li>• Legitimate interests</li> </ul>
ID swipe access cards	Name, photo, location, record of site access, attendance monitoring that may be used for fire roll call, referenced in investigations or for payroll purposes	<ul style="list-style-type: none"> <li>• Legitimate interests</li> </ul>
IT information	Information required to provide access to company IT systems and networks, such as name, contact information, location, IP addresses, log files and login information	<ul style="list-style-type: none"> <li>• Legitimate interests</li> </ul>
Accident reporting (RIDDOR) and other Health and Safety records	Name, contact information, health and safety records, date of birth, any photo's or video evidence and your employment status	<ul style="list-style-type: none"> <li>• Legitimate interests</li> <li>• Legal obligation</li> </ul>
Managing payment of business expenses	Name, contact information, employee number or unique identifier, band, job title, bank details and information about your expenses claims	<ul style="list-style-type: none"> <li>• Legitimate interests</li> <li>• Contract</li> </ul>



## Appendix 2 – Britvic Data Controllers

### Britvic EEA/UK Data Controllers

Britvic Company	Country of establishment	Address
Britvic PLC	UK	Breakspear Park, Breakspear Way, Hemel Hempstead, Hertfordshire HP2 4TZ, UK
Britvic Soft Drinks Ltd	UK	Breakspear Park, Breakspear Way, Hemel Hempstead, Hertfordshire, HP2 4TZ
Britvic EMEA Ltd	UK	Breakspear Park, Breakspear Way, Hemel Hempstead, Hertfordshire, HP2 4TZ
Britvic Pensions Ltd	UK	Breakspear Park, Breakspear Way, Hemel Hempstead, Hertfordshire, HP2 4TZ
Britvic Ireland Ltd	Republic of Ireland	10 Earlsfort Terrace, Dublin 2, D02T380, Ireland
Britvic Americas Ltd	Republic of Ireland	10 Earlsfort Terrace, Dublin 2, D02T380, Ireland
Teisseire France SAS	France	482 Avenue Ambroise Croizat 38926, Crolles, France
Pressade SAS	France	Z.I. Les Affôrêts 74800, La Roche-Sur-Foron, France

### Britvic Non EEA/UK Data Controllers

Britvic Company	Country of establishment	Address
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Empresa Brasileira De Bebidas Alimentos S.A.	Brazil	Avenida Consul Joseph Noujaim 40, Pina, Recife, Pernambuco, CEP 51110-150, Brazil
Bela Ischia Alimentos Ltda	Brazil	Rodovia MG 285-KM 77, sem número, Centro, CEP 36780-000, Astolfo Dutra/MG, Brazil
Britvic Asia Pte	Singapore	80 Robinson Road #17-02, Singapore 068898, Singapore
Britvic North America LLC	USA	1209 Orange Street, Wilmington, Delaware 19801, United States of America





## Appendix 3

### Supervisory Authority Details for Complaints

Location	Supervisory Authority	Contact Details
<b>United Kingdom</b>	Information Commissioner's Office (ICO)	T: 0303 123 1113 <a href="#">Website</a>
<b>Belgium</b>	Belgian Data Protection Authority (GBA)	T: +32 (0)2 274 48 00 <a href="#">Website</a>
<b>The Netherlands</b>	Dutch Data Protection Authority (Dutch DPA)	T: (+31) - (0)70 - 888 85 00 <a href="#">Website</a>
<b>USA</b>	Department of Legal Affairs, Office of the Attorney General (AG) (Ashley Moody)	T: +1 (850) 414-3300 <a href="#">Website</a>
<b>Singapore</b>	Personal Data Protection Commission (PDPC)	T: +65 6377 3131 <a href="#">Website</a>

