



Employee Privacy Notice

The James Fisher and Sons plc group (the "Group") is committed to protecting your privacy and complying with the Data Protection Act 2018, the European Union (Withdrawal) Act 2018 and the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019.

This Privacy Notice sets out the basis on which the companies within the Group collect, use and disclose the personal data of current and former employees, workers, individual contractors, applicants, agency workers, consultants and directors, as well as those individuals' rights in respect of such personal data. References to "staff" or "you" or "your" in this Employee Privacy Notice are references to all these categories of individual. Where we use the term "employment" (or its derivatives) in this Employee Privacy Notice this includes also other engagements where you work for us, but are not an employee.

The data controller for our processing of your personal data is your relevant employing entity (the "Company"), as listed with relevant contact details in Schedule 3 to this notice. In this Employee Privacy Notice the terms "we", "us" and "our" are references to the Company.

We may update this Privacy Notice from time to time and will publish an up to date copy of the Privacy Notice on the company intranet; <https://jfplc.sharepoint.com/>.

If you have any questions, would like to access the information in this Employee Privacy Notice in a different form, would like to exercise your rights, believe privacy rights have been violated or are concerned there may have been a breach of privacy laws, policies or procedures, please contact dataquery@james-fisher.co.uk, or James Marsh, Group General Counsel and Company Secretary, and James Fisher and Sons Plc's Data Protection Officer: j.marsh@james-fisher.co.uk, tel: +44 (0)1229 615400.

How we collect your Personal Data

We may collect your Personal Data in a number of ways, for example:

- when you provide it to us, either directly to your managers or HR, or when you enter it into our systems (for example, through your participation in HR processes, emails that you send or through verbal information which is recorded electronically or manually);
- when you register with us for recruitment and vacancy updates, or when you apply for a vacancy internally or externally;
- when we collect data through the implementation of any HR employee relations policies e.g. disciplinary procedures;
- in the course of managing your employment with the Group, for example appraisals, payroll;
- when data is collected from your managers, HR or your colleagues;
- when you place contact details on the Group's internal employee directory;
- when you use any HR services;
- when we receive your personal data from third parties (for example security screening, recruitment agencies, references from previous employers, medical



reports from external professionals, information from tax authorities, benefit providers, the Child Support Agency etc.); and

- in some cases when data is collected indirectly (for example email and internet usage records, or CCTV).
- In the course of arranging your business/client contract related travel.

What type of Personal Data do we collect?

The Company collects and processes your personal data for the purposes described in this Employee Privacy Notice. A list of the categories of data which the Company processes is set out below. For this purpose please note that personal data means any information describing or relating to an identified or identifiable individual. An identifiable individual is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.

Apart from personal data relating to you, you will also provide the Company with personal data of third parties, notably your dependents and other family members, for purposes of HR and corporate administration and management, including the administration of benefits, to contact someone in an emergency, and in some cases for the purposes of meeting the Company's regulatory obligations. Before you provide such third party personal data to the Company, you must first inform affected third parties of the personal data which you intend to provide to the Company, and of the processing to be carried out by the Company, as detailed in this Employee Privacy Notice.

Special Category Personal Data

To the extent permitted by applicable laws, the Company will collect and process a limited amount of personal data falling into special categories, sometimes called "sensitive personal data". This term means information relating to: racial or ethnic origin; political opinions; religious or philosophical beliefs; physical or mental health (including details of accommodations or adjustments); trade union membership; sex life or sexual orientation; biometric and genetic data; and information regarding criminal offences or proceedings.

Types of Information Collected

In particular, we may collect the following types of personal information about you, depending on your circumstances, your role and the law:

Type of Information	Examples
	Please note the examples are illustrative and non-exhaustive
Information about you:	Title, name, address, date of birth, civil/marital status, nationality, race, gender, age, religion, and preferred language, details of any disabilities, work restrictions and/or required accommodations
Information to contact you at work or home:	Personal contact details and contact details for your next-of-kin/dependent(s)/emergency contact including names, addresses, telephone numbers, email addresses and their relationship to you
Information to identify you:	Photographs, passport and/or driving licence details



Information about your suitability to work for us and/or a relevant third party:	References, interview notes, results of any psychometric profiling, work visas or other right to work information, ID information (such as passport details and driving licence information), records/results of pre-employment checks, including criminal record checks, credit and fraud checks (where permitted), information relating to the outcome of your application.
Information about your skills and experience:	CVs, application forms, references, academic history, records of qualifications, skills, training and other compliance requirements
Information about your employment with the James Fisher Group	Letter of offer and acceptance of employment, your employment contract, any subsequent contract changes, work contact details, employee number/ID, work biography, department, reporting line, start and termination date, cost centre
Information that we need to pay you:	Remuneration information, bank account details, national insurance numbers, tax information
Information that we need to provide you with benefits and other entitlements:	Length of service information, health information, leave requests, third party benefit recipient information (e.g. expression of wish and dependents information), pension details, benefit details, expenses information, deductions information, salary sacrifice arrangements, share scheme participation details
Information to allow you to access our buildings and systems:	Employee numbers, computer or facilities access of authentication information, passwords, photographs, video images
Information relating to your timekeeping, attendance and leave from work:	Timekeeping and attendance records, holiday, leave and absence records (including dates, reasons, requests and approvals), records relating to family leave (e.g. maternity, paternity etc), special leave (e.g. bereavement, jury service, compassionate) and any other paid or unpaid leave, flexible working requests
Information relating to your performance at work:	Performance ratings, OMR ratings, career resumes, targets, objectives, records of appraisals, records and/or notes of 1-1s and other meetings, personal development plans, personal improvement plans, correspondence and reports.
Training and development information:	Training records, assessments completed
Information relating to discipline, grievance and other employment related processes:	Interview/meeting notes or records, statements / allegations received, related correspondence
Absence management data:	Absence history, medical notes, details of incapacity and work impact and adjustments, doctor details, details of treatment and prognosis, manager and HR communications, return to work interviews, meeting notes or records, related correspondence, medical reports, occupational health reports
Information relating to your work travel and expenses:	Bank account details, passport, driving licence, visa and inoculation details, vehicle registration and insurance details.
Restructure and redundancy records (where applicable):	Change plans, organisation charts, consultation records, selection and redeployment data



Health and safety data:	Health and safety audits, screening requests, risk assessments, incident reports
Employee claims (where applicable):	Subject matter of litigation and complaints, details of conciliation or other settlement negotiations, related communications and correspondence
Diversity data:	Where permitted by law and provided voluntarily, processed in a de-personalised form wherever practicable, for equal opportunities monitoring purposes
Monitoring:	CCTV, building access information, system and equipment use logs, vehicle tracking
Other:	any other personal data which you choose to provide to the Company or to Company personnel during the course of your employment, informal opinion data generated in the course of your employment relating to the administration or management of the Company's relationship with you

Why do we collect and use your personal information and what is the legal basis for this

The legal basis on which we process your personal data

Whenever we process your personal data we do this on a legal basis or justification for that processing. In the majority of cases, the processing of your personal data will be justified on one of the following bases:

- The processing is necessary for compliance with a legal obligation to which the Company is subject; or
- The processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into such a contract; or
- The processing is in accordance with legitimate interests pursued by the Company, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data.

Where we rely on legitimate interest, the detail of our legitimate interest in particular processing will vary depending on our business purpose. However, in general terms we have a legitimate interest in attracting and retaining engaged, motivated, high calibre people to work for us; and in securing, defending, managing and developing our business and our people in line with our policies and procedures and in line with our legal and regulatory obligations. Our processing is designed to support these aims.

If our processing involves the collection or use of special categories of data, where that is permitted under applicable laws, we also rely on an additional legal justification set out below.

We will, on occasion, process your personal data for the purpose of legitimate interests pursued by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data (for example to meet the security requirements of our customers).



In exceptional circumstances you may ask us to process data for a particular purpose, and we will carry out the processing on your instruction and on your behalf (for example if you ask us to provide pay information to a bank for a mortgage application made by you).

We have set out in **Schedule 1** to this Employee Privacy Notice the purposes for which we use your personal data, and the legal basis on which we rely in each case.

Additional legal bases we rely on where we process special category data

Where we process special categories of data it will be justified by one of the conditions noted above and also by one of the following additional conditions:

- The processing is necessary for the purposes of carrying out the obligations and exercising the rights of you or the Company in the field of employment law, social security and social protection law, to the extent permissible under applicable laws;
- The processing is necessary for the purposes of preventive or occupational medicine, for the assessment of your working capacity, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services, to the extent permitted by applicable laws;
- The processing is necessary to protect your vital interests or of another person where you are physically or legally incapable of giving consent (for example in exceptional emergency situations, such as a medical emergency);
- The processing is necessary for purposes authorised by applicable law. This includes ensuring equality of opportunity or treatment between people of different racial or ethnic origins, holding different religious or philosophical beliefs, people with different states of physical or mental health or people of different sexual orientation with a view to enabling such equality to be promoted or maintained;
- The processing is necessary for the establishment, exercise or defence of legal claims; or
- In exceptional circumstances the processing is carried out subject to your explicit consent (as explained below).

We have set out in **Schedule 2** to this Employee Privacy Notice the purposes for which we use your special category personal data and the additional legal justification on which we rely in each case.

Consent in exceptional circumstances

We may, on an exceptional basis, seek your consent to certain processing which is not otherwise lawfully justified. If consent is required for the processing in question, it will be sought from you separately. Information regarding such processing will be provided to you at the time that consent is requested, along with the impact of not providing any such consent. It is not a condition or requirement of your employment to agree to any request for consent from the Company.

Processing data relating to criminal convictions and offences

Personal data relating to criminal convictions and offences will only be processed where authorised by applicable laws. For example:



- a criminal record check will be carried out on recruitment or transfer, or intermittently where ongoing screening is required if you have applied for a role for which a check is authorised by applicable laws;
- an allegation of a criminal offence or conviction arising during your relationship with the Company will be processed (e.g. in a disciplinary process) for the purpose of making decisions regarding your relationship with the Company.

Additional information to ensure transparency for particular processing

Additional information regarding specific processing of personal data will be notified to you or set out in applicable policies where appropriate. This additional information is to ensure you have access to full details of the relevant data and purposes it is used for where it may not be obvious. For example: CCTV, IT monitoring, vehicle tracking, drug and alcohol testing.

How long the data will be stored for

The Company endeavours to ensure that personal data is kept as current as possible and that irrelevant or excessive data is deleted or made anonymous as soon as reasonably practicable.

The Company's general approach is to only retain personal data for as long as is required to satisfy the purpose for which it was collected by us or provided by you. This will usually be the period of your employment/contract with us, plus the length of any applicable statutory limitation period following your departure, although some data, such as pension information, will need to be kept for longer, and some information will be deleted earlier.

We will keep some specific types of data, for example, tax records, for different periods of time, as required by applicable law or for other legitimate business reasons.

Sharing your personal data

We may share your personal data:

- with our employees - in particular your personal data can be accessed by or will be disclosed internally on a need to know basis to Company or Group Human Resources; management responsible for managing or making decisions in connection with your relationship with the Company or when involved in an HR process concerning your relationship with the Company; system administrators; and where necessary for the performance of their role, by staff in the Group teams such as the Finance and IT Department and the HR information systems support teams;
- where appropriate, with other companies within the current and future Group, where appropriate where they provide us with services or have a legitimate need for the data as independent data controllers;
- with other third party contractors who provide services to us - examples of third parties with whom your data will be shared where appropriate include tax and social security authorities, regulatory authorities, the Company's insurers, bankers, IT administrators, lawyers, auditors, investors, health and safety consultants, recruitment agents, occupational health providers and other professional advisors, HR system providers (e.g. Northgate, Eploy) benefit providers and



administrators, third party staff vetting providers and medical advisers where we seek a report or assessment of you;

- where we and/or the Group are under a legal obligation to do so, for example if there is a requirement to share information under statute, to prevent fraud and other criminal offences or because of a Court Order for example HRMC, the police.
- with third party customers - if relevant for your employment, we may share your personal data with third party customers where your work involves providing a skilled service to that customer, and to the extent necessary to demonstrate your capabilities and skills to carry out such service.

Transferring personal data to other countries

Some of your personal data (including special categories of personal data) will be accessible by or transferred to other parties for the purposes described in this Data Privacy Notice.

As a result, some of your personal data will be transferred to countries outside of the country in which you work or outside of the European Union to countries whose data protection laws will be less stringent than yours.

The Company will ensure that appropriate or suitable safeguards are in place to protect your personal information and that transfer of your personal information is in compliance with applicable data protection laws.

Where required by applicable data protection laws, the Company has ensured that service providers (including relevant Group companies) sign standard contractual clauses as approved by the European Commission or other supervisory authority with jurisdiction over the relevant Company exporter. You can obtain a copy of any standard contractual clauses in place which relate to transfers of your personal data by contacting dataquery@jamesfisher.co.uk.

Your rights

Your right to access, correct and delete your personal data

The Company aims to ensure that all personal data is correct. You also have a responsibility to ensure that changes in personal circumstances (for example, change of address and bank accounts) are notified to the Company so that we can ensure that your data is up-to-date.

You have the right to request access to any of your personal data that the Company will hold, and to request correction of any inaccurate data relating to you. You furthermore have the right to request deletion of any irrelevant data we hold about you.

Data portability

Where we are relying upon your consent or the fact that the processing is necessary for the performance of a contract to which you are party as the legal basis for processing, and that personal data is processed by automatic means, you have the right to receive all such



personal data which you have provided to the Company in a structured, commonly used and machine-readable format, and also to require us to transmit it to another controller where this is technically feasible.

Right to restriction of processing:

You have the right to restrict our processing of your personal data where:

- you contest the accuracy of the personal data, until we have taken sufficient steps to correct or verify its accuracy;
- where the processing is unlawful but you do not want us to erase the data;
- where we no longer need the personal data for the purposes of the processing, but you require them for the establishment, exercise or defence of legal claims; or
- where you have objected to processing justified on legitimate interest grounds (see below), pending verification as to whether the Company has compelling legitimate grounds to continue processing.

Where personal data is subjected to restriction in this way we will only process it with your consent or for the establishment, exercise or defence of legal claims.

Right to withdraw consent

Where we have relied on your consent to process particular information and you have provided us with your consent to process data, you have the right to withdraw such consent at any time. You can do this (i) if available, by deleting the relevant data from the relevant HR system (although note that in this case it will remain in back-ups and linked systems until it is deleted in accordance with our data retention policy) or (ii) by contacting your local Human Resources contact. It will only however be rarely that we rely on your consent to process personal data for your employment or engagement.

Right to object to processing justified on legitimate interest grounds

Where we are relying upon legitimate interest to process data, then you have the right to object to that processing. If you object, we must stop that processing unless we can either demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms or where we need to process the data for the establishment, exercise or defence of legal claims. Where we rely upon legitimate interest as a basis for processing we believe that we can demonstrate such compelling legitimate grounds, but we will consider each case on an individual basis.

Right to complain

You also have the right to lodge a complaint with the Information Commissioner's Office (ICO) if you consider that the processing of your personal data infringes applicable law (<https://ico.org.uk>).

For further information regarding your rights, or to exercise any of your rights, please contact us at dataquery@james-fisher.co.uk.



You are able to view and update the personal data we hold about you, such as addresses and telephone numbers, via your MyView self-service portal. If you have any problems doing this please call the HR team on 01229 615400.

Security

The security of your personal data is very important to us. We will ensure that we have in place appropriate technical and organisational measures to prevent unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to personal data.



SCHEDULE 1: PURPOSES FOR WHICH WE PROCESS PERSONAL DATA AND OUR LEGAL JUSTIFICATION

Purpose for which we need your personal information	Examples Please note the examples are illustrative and non-exhaustive	Lawful basis for processing
Recruitment and selection	<ul style="list-style-type: none"> • To assess your suitability • To conduct assessments and interviews • To compare you with other applicants and make a decision on whether to make you an offer • To consider any adjustments of accommodations for the recruitment process or if you were to commence work with us in the event you have a disability 	<ul style="list-style-type: none"> • Some of this processing is necessary for the compliance with legal obligations to which the Company is subject including the requirement to ensure we do not unlawfully discriminate in our recruitment decision. • Some of this processing is necessary for taking steps at your request to enter into a contract with you. Where you have applied to work for us, we need to use your personal data to make an offer of employment to you where appropriate. • Additional processing is necessary for the purpose of the legitimate interests pursued by the Company. • The Company has a legitimate interest in fully assessing applicants to ensure that only suitable and appropriate candidates are selected, to compare candidates and decide who to recruit. The Company aims to recruit the best person for each vacancy through fair, systematic, effective recruitment and selection procedures.
References and pre-employment checks	<ul style="list-style-type: none"> • To conduct pre-employment checks including, where relevant and appropriate: <ul style="list-style-type: none"> ○ reference checks 	<ul style="list-style-type: none"> • This processing is necessary for the compliance with the legal obligation to establish your right to work in the UK.



Purpose for which we need your personal information	Examples Please note the examples are illustrative and non-exhaustive	Lawful basis for processing
	<ul style="list-style-type: none"> ○ verification of details provided ○ right to work checks ○ criminal record checks ○ security checks 	<ul style="list-style-type: none"> ● Criminal records checks are carried out where there is an identified requirement to pass security checks in relation to the role and/or location of their employment due building or customer policy. ● Additional checks are necessary for the purpose of the legitimate interests pursued by the Company. ● The Company has a legitimate interest in ensuring that candidates for employment or engagement do not pose an unacceptable risk to the business or its customers and considers the verification carried out necessary to protect the business and customers.
Job offers, on-boarding and HR administration	<ul style="list-style-type: none"> ● To make offers and issue contracts of employments ● Taking steps to on board you to our systems where you accept an offer including transferring relevant recruitment information into our records ● Day to day administration of your employment and your contract 	<ul style="list-style-type: none"> ● Some of this processing is necessary for the compliance with legal obligations to which the Company is subject including the requirement to issue written particulars or terms of employment and the requirement not to unlawfully discriminate in the terms of any offer to you. ● Additionally, some of this processing is necessary to take steps to enter into the contract between you and the Company and to perform that contract to make an appropriate offer to you and administer your employment contract if you join us. ● Other aspects of the processing are



Purpose for which we need your personal information	Examples Please note the examples are illustrative and non-exhaustive	Lawful basis for processing
		<p>necessary for the purpose of the legitimate interests pursued by the Company.</p> <ul style="list-style-type: none"> The Company has a legitimate interest in ensuring the effective engagement of staff on appropriate terms and conditions of employment, that there is a smooth transition into employment for successful candidates and an effective administration of the employment relationship.
Future job opportunities	<ul style="list-style-type: none"> Assessing if you may be suitable for future job opportunities if you are not successful in an application Contacting you for this purpose 	<ul style="list-style-type: none"> This processing is necessary for the purpose of the legitimate interests pursued by the Company. The Company has a legitimate interest in maintaining an appropriate pool of talent who have shown an interest in working for the Company and who are potentially suitable candidates for employment. This is particularly important in niche areas with a skills shortage and will potentially benefit both initially unsuccessful candidates and the Company.
Recruitment queries and challenges	<ul style="list-style-type: none"> Dealing with queries, challenges, requests for feedback or claims received in relation to recruitment decisions 	<ul style="list-style-type: none"> This processing is necessary for the compliance with legal obligations to which the Company is subject including ensuring that the Company is able to demonstrate its compliance with data protection laws and anti-discrimination laws. Beyond legal compliance, processing is necessary for the purpose of the legitimate



Purpose for which we need your personal information	Examples Please note the examples are illustrative and non-exhaustive	Lawful basis for processing
		<p>interests pursued by the Company.</p> <ul style="list-style-type: none"> The Company has a legitimate interest in being able to provide feedback to candidates and to be able to defend any challenge or claim made in connection with our recruitment decision.
<p>Identification and communication</p>	<ul style="list-style-type: none"> Identifying and communicating effectively with staff 	<ul style="list-style-type: none"> Using your data to communicate with you is necessary for the compliance with legal obligations to which the Company is subject including the need to communicate with you regarding processes governed by employment laws (e.g. a consultation exercise or investigation) or as part of our duty of care towards you. Processing is also necessary to perform the contract between you and the Company. Additional processing is necessary for the purpose of the legitimate interests pursued by the Company. The Company also has a legitimate interest in contributing to appropriate safety and security by ensuring that employees can be identified. The Company also has a legitimate interest in facilitating effective communication and collaboration between staff and between staff and others to maximise operational performance and collaboration and to help staff work together for the benefit of the



Purpose for which we need your personal information	Examples Please note the examples are illustrative and non-exhaustive	Lawful basis for processing
Training and development	<ul style="list-style-type: none"> • Training and development activities • Promotion and career progression activities • Retention and succession planning • Contingency planning 	<p>business.</p> <ul style="list-style-type: none"> • Processing related to role related training is necessary to perform the contract between you and the Company. • The other aspects of processing are necessary for the purpose of the legitimate interests pursued by the Company. • The Company has a legitimate interest in managing its workforce and operating its business. This includes ensuring that each employee is trained for their role. It also includes ensuring that there are succession and contingency plans in place so that the business can maintain knowledge, skills and relationships. This also includes supporting and developing our personnel in their career to help the Company retain engaged, motivated, high calibre employees.
Pay, benefits and pension	<ul style="list-style-type: none"> • Awarding, providing and administering remuneration, pension, benefits and incentive schemes • Compensation, payroll and benefits planning • Making appropriate tax and social security deductions and contributions 	<ul style="list-style-type: none"> • This processing is necessary for the compliance with legal obligations to which the Company is subject including the provision of statutory payments, pension and benefits and complying with the requirements of the tax authorities in relation to tax and social security. • Processing is also necessary to perform the contract between you and the Company in order to provide and administer the payments, pension and benefits we have



Purpose for which we need your personal information	Examples Please note the examples are illustrative and non-exhaustive	Lawful basis for processing
		<p>agreed to provide to you as part of your contract of employment and terms of employment.</p> <ul style="list-style-type: none"> • This processing is also necessary for the purpose of the legitimate interests pursued by the Company. • The Company has a legitimate interest in ensuring that remuneration is set an appropriate level and properly administered.
Work, time, attendance and leave management	<ul style="list-style-type: none"> • Allocating and managing duties and responsibilities • Managing your hours and pattern of work and attendance and leave time off of all types 	<ul style="list-style-type: none"> • This processing is necessary to perform the contract between you and the Company. • Additional processing is necessary for the purpose of the legitimate interests pursued by the Company. • The Company has a legitimate interest in managing its workforce and business. This includes ensuring the effective allocation and organisation of work amongst its employees and ensuring that each employee carries out appropriate duties and managing time, attendance and leave in line with policies and procedures and the contract of employment. • Effective employee management in this way is important to enable the Company to carry out its commitments to customers and to manage its resources efficiently and effectively.
Business travel and global mobility	<ul style="list-style-type: none"> • Administering travel bookings • Dealing with visa applications and other related 	<ul style="list-style-type: none"> • Some of this processing is necessary for compliance with legal obligations to which



Purpose for which we need your personal information	Examples Please note the examples are illustrative and non-exhaustive	Lawful basis for processing
	licences	<p>the Company is subject including ensuring your right to work legally in overseas jurisdictions and, where necessary, facilitating the setting up of entities/bank accounts and other regulatory/financial requirements.</p> <ul style="list-style-type: none"> • This processing is necessary to perform the contract between you and the Company. • Additional processing is necessary for the purpose of the legitimate interests pursued by the Company. • The Company has a legitimate interest in managing its workforce and operating its business. This includes maintain relationships with customers and suppliers and ensuring the effective allocation of talent around the organisation in order to meet client needs.
Performance reviews	<ul style="list-style-type: none"> • Setting performance expectations and objectives • Monitoring and measuring performance against goals and objectives • Managing and operating performance reviews 	<ul style="list-style-type: none"> • This processing is necessary for the purpose of the legitimate interests pursued by the Company. • The Company has a legitimate interest in setting objectives for staff to ensure that members of staff are aligned to the needs and goals of the Company; in measuring the achievement of staff against those objectives; assessing the development needs staff to ensure the highest standards of performance and to support career.



Purpose for which we need your personal information	Examples Please note the examples are illustrative and non-exhaustive	Lawful basis for processing
		<ul style="list-style-type: none"> The Company has a further legitimate interest in ensuring an appropriate performance related measure to support fair, consistent, objective performance related reward and to support performance assessment for the purpose of other HR processes.
Formal HR management procedures	<ul style="list-style-type: none"> Dealing with issues and concerns relating to performance, capability, absence, conduct and employee complaints Informal and formal performance management Disciplinary procedures Grievance procedures Managing allegations and complaints, investigations and other informal and formal HR processes Making related management decisions 	<ul style="list-style-type: none"> This processing is necessary for the compliance with legal obligations to which the Company is subject, including our duty of care towards you, to avoid unlawful dismissal and comply with anti-discrimination laws. This processing is also necessary to perform the contract between you and the Company where we have committed to comply with certain procedures as part of your terms and conditions of employment. Additional processing is necessary for the purpose of the legitimate interests pursued by the Company. The Company has a legitimate interest in managing its workforce and operating its business. This includes putting in place appropriate standards, policies and procedures for employees and taking action if they are not complied with. It includes setting appropriate standards of attendance, behaviour and performance taking appropriate action where standards are not



Purpose for which we need your personal information	Examples Please note the examples are illustrative and non-exhaustive	Lawful basis for processing
Employee relations and engagement	<ul style="list-style-type: none"> • Consultations or negotiations with staff or representatives of staff • Engagement programmes such as employee surveys 	<p>met or maintained.</p> <ul style="list-style-type: none"> • Some of this processing is necessary for the compliance with legal obligations to which the Company is subject including statutory consultation. • Processing is also necessary for the purpose of the legitimate interests pursued by the Company where the consultation or employee engagement programme is not a statutory matter. The Company has a legitimate interest in seeking the views of its workforce on business improvement opportunities and on proposals which will impact on staff.
Absence and incapacity management	<ul style="list-style-type: none"> • Assessing eligibility for incapacity related remuneration or benefits • Determining ability to work • Facilitate return to work • Making adjustments or accommodations to duties or the workplace • Making decisions regarding employment or redeployment 	<ul style="list-style-type: none"> • Some of this processing is necessary for the compliance with legal obligations to which the Company is subject including health and safety laws, our duty of care to staff, providing statutory incapacity benefits, avoiding unlawful dismissal and compliance with disability discrimination laws. • Additional processing is necessary to perform the contract between you and the Company including the provision of payments and benefits relating to absence or incapacity. • Additional processing is also necessary for the purpose of the legitimate interests pursued by the Company.



Purpose for which we need your personal information	Examples Please note the examples are illustrative and non-exhaustive	Lawful basis for processing
		<ul style="list-style-type: none"> The Company has a legitimate interest in managing and supporting its workforce and taking steps to identify and mitigate risks to staff health, safety or welfare, ensure fitness for work and to manage absence and incapacity impacting on the ability of staff to perform their roles.
Restructuring, corporate transactions, outsourcing and other contracting arrangements	<ul style="list-style-type: none"> Planning restructuring or redundancies or other change programmes, corporate transactions or outsourcing of services Communicating with relevant stakeholders about the impact of any such arrangements Assessing and selecting staff where required Providing due diligence information about employees 	<ul style="list-style-type: none"> This processing is necessary for the compliance with employment laws to which the Company is subject including, where relevant, in relation to rules relating to the automatic transfer of staff from one organisation to another; redundancies or potential terminations due to business reasons; and laws regulating corporate transactions. This includes appropriate consultation, appropriate selection where relevant, consideration of alternatives in the event that employment on the same terms or role cannot be continued and other procedural steps laid down by law to avoid unlawful dismissals. Additional processing beyond legal compliance is necessary for the purpose of the legitimate interests pursued by the Company. The Company has a legitimate interest in planning and implementing changes in its



Purpose for which we need your personal information	Examples Please note the examples are illustrative and non-exhaustive	Lawful basis for processing
		<p>operations to preserve operations, maximise efficiency, grow or modernise its business in a fair and effective way.</p> <ul style="list-style-type: none"> • Business change and transformation is important to ensure business continuity and to support the Company's immediate and long-term business goals and outcomes.
Security and safety purposes	<ul style="list-style-type: none"> • Physical access control • Authorising, granting, administering, monitoring and terminating access to use of facilities, records, property and infrastructure • Investigating activities and incidents and reporting where required • Liaising with relevant authorities • CCTV monitoring • drug and alcohol • vehicle tracking • Securing relevant insurance and dealing with any insurance claims 	<ul style="list-style-type: none"> • This processing is necessary for the compliance with legal obligations to which the Company is subject including health and safety laws, our duty of care, data protection and other laws to which the Company is subject. • The Company also has a legitimate interest in managing its workforce and operating its business and protecting its business and all stakeholders (including employees) from various risks. • This includes putting in place appropriate standards, policies and procedures for employees, measuring compliance, detecting breaches and taking action if they are not complied. • It includes monitoring where appropriate and also includes providing ways for employees and others to report conduct or compliance issues and the appropriate consideration and investigation of matters drawn to the Company's attention.



Purpose for which we need your personal information	Examples Please note the examples are illustrative and non-exhaustive	Lawful basis for processing
		<ul style="list-style-type: none"> This is important to maintain business standards and risks, ensure business continuity and to protect the Company's operation and reputation as well as employees and third parties who may be affected by the Company's operations.
IT purposes	<ul style="list-style-type: none"> Access control and monitoring System administration, support, development, management and maintenance Ensuring compliance with the Company's IT policies and to locate information through searches where needed for a legitimate business purpose Monitor email, telephone, internet usage 	<ul style="list-style-type: none"> The Company has a legitimate interest in managing its systems and protecting its business and all stakeholders from various risks. It also includes appropriate protection of the IT network, systems and business devices to maintain the integrity and security of data and business information and facilitating records management. This is important to maintain business standards, ensure business continuity and to protect the Company's operation and reputation. IT Policies are available on the intranet: https://jfplc.sharepoint.com/SitePages/Working-for-James-Fisher.aspx
Equality and diversity monitoring	<ul style="list-style-type: none"> Collecting and assessing equality and diversity information from job applicants and employees 	<ul style="list-style-type: none"> This processing is necessary for the public interest of ensuring equality of opportunity or treatment between people of different racial or ethnic origins, holding different religious or philosophical beliefs, people with different states of physical or mental health or people



Purpose for which we need your personal information	Examples Please note the examples are illustrative and non-exhaustive	Lawful basis for processing
		<p>of different sexual orientation with a view to enabling such equality to be promoted or maintained.</p> <ul style="list-style-type: none"> • Beyond the above processing is also necessary for the purpose of the legitimate interests pursued by the Company. • The Company has a legitimate interest in ensuring that it takes action to prevent discrimination and promote an inclusive and diverse workplace.
Information management, business planning and reporting	<ul style="list-style-type: none"> • Contingency planning • Budgetary and financial planning and administration • Operational planning • Company reports 	<ul style="list-style-type: none"> • Some of this processing is necessary for the compliance with legal obligations to which the Company is subject including statutory Company reporting obligations and corporate governance requirements. • Additional processing is necessary for the purpose of the legitimate interests pursued by the Company. • The Company has a legitimate interest in managing its workforce and operating its business, ensuring appropriate governance and controls are in place and to measure and report on financial management and business performance and plan for the future. This includes appropriate preparation of internal and external reports on a range of business areas. Effective planning, management information and reporting is important for effective management of the



Purpose for which we need your personal information	Examples Please note the examples are illustrative and non-exhaustive	Lawful basis for processing
		business, risk management and decision making.
Business communications and customer/supplier/stakeholder management	<ul style="list-style-type: none"> • Providing contact details to customers or suppliers • Including employee information in tenders for work • Producing team records 	<ul style="list-style-type: none"> • This processing is necessary for the purpose of the legitimate interests pursued by the Company. • The Company has a legitimate interest in winning business and growing its business and complying with contracts entered into with customers. • This includes the sharing of appropriate information with customers and prospective customers about who is or will be working with them to develop relationships with and support the effective performance of commitments for customers. In some cases this will also include supporting customers to comply with their legal or regulatory obligations or security requirements by having sufficient information about those providing services to them. • The Company also has a legitimate interest in ensuring that it can develop and operate the relationship with suppliers and other trade partners effectively.
References	<ul style="list-style-type: none"> • Responding to reference requests 	<ul style="list-style-type: none"> • This processing is necessary for the purpose of the legitimate interests pursued by the Company and potential new employers. It is in the legitimate interests of a new employer to receive confirmation of basic employment



Purpose for which we need your personal information	Examples Please note the examples are illustrative and non-exhaustive	Lawful basis for processing
		<p>details from the Company for the purposes of confirming a former employee's employment history.</p>
Litigation	<ul style="list-style-type: none"> • Defending claims submitted by employees or former employees • Enforcing our legal rights against employees 	<ul style="list-style-type: none"> • This processing is necessary for the compliance with legal obligations to which the Company is subject including demonstrating compliance with employment and health and safety laws and data protection laws. • Beyond legal compliance processing is necessary to perform the contract between you and the Company including the enforcement of the Company's rights under that contract. • Additional processing is necessary for the purpose of the legitimate interests pursued by the Company. • The Company considers that it has a legitimate interest in protecting its organisation from breaches of legal obligations owed to it and to defend itself from litigation to protect the Company's reputation and to protect the Company from damage or loss.



SCHEDULE 2: PURPOSES FOR WHICH WE PROCESS SPECIAL CATEGORY PERSONAL DATA AND OUR ADDITIONAL LEGAL JUSTIFICATION

Purpose for processing	Additional lawful basis for special category data processing
<p>Your racial or ethnic origin, religion, philosophical or political belief, sexual orientation or disability status will be used for the collection of statistical data subject to local laws, or where required to record such characteristics to comply with equality and diversity requirements of applicable legislation or to keep the Company’s commitment to equal opportunity under review.</p>	<p>This processing is necessary for the public interest of ensuring equality of opportunity or treatment between people of different racial or ethnic origins, holding different religious or philosophical beliefs, people with different states of physical or mental health or people of different sexual orientation with a view to enabling such equality to be promoted or maintained.</p>
<p>Health and medical information will be used to comply with employment, health and safety or social security laws.</p>	<p>This processing is necessary for the purposes of carrying out the obligations and exercising the rights of you or the Company in the field of employment law, social security and social protection law, to the extent permissible under applicable laws.</p> <p>For example, to carry out statutory risk assessments and regular health and safety assessments, provide statutory incapacity or maternity benefits, avoid breaching legal duties to you, to ensure fair and lawful management of your employment, avoid unlawful termination of your employment, to administer the Company’s private medical scheme and death in service insurance scheme, to make reasonable accommodations or adjustments and avoid unlawful discrimination or dealing with complaints arising in this regard.</p> <p>To the extent that this data is managed by our occupational health advisers, this processing is necessary for the purposes of preventive or occupational medicine, for the assessment of your working capacity, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and</p>



Purpose for processing	Additional lawful basis for special category data processing
	services, to the extent permitted by applicable laws.
<p>Special category personal data of any type will be used in the management and investigation of any complaint under the Company's grievance, whistleblowing, Dignity at Work, or similar policies and procedures or disciplinary procedures where such information is sufficiently relevant to the particular complaint or issue.</p>	<p>This processing is necessary for the purposes of carrying out the obligations and exercising the rights of you or the Company in the field of employment law to the extent permissible under applicable laws. In particular employment laws relating to the effective management of complaints and avoiding unlawful dismissals, anti-discrimination laws and our duty of care to staff.</p>
<p>Special category personal data of any type will be used for dealing with legal claims where such information is sufficiently relevant to the particular claim.</p>	<p>The processing is necessary for the establishment, exercise or defence of legal claims.</p>



SCHEDULE 3: JAMES FISHER AND SONS PLC GROUP EMPLOYING ENTITIES

Name	Country	Registered Office
Cattedown Wharves Limited	United Kingdom	Fisher House, PO Box 4, Barrow in Furness, Cumbria, LA14 1HR
EDS HV Management Limited	United Kingdom	Fisher House, PO Box 4, Barrow in Furness, Cumbria, LA14 1HR
Electricity Distribution Services Limited	United Kingdom	Fisher House, PO Box 4, Barrow in Furness, Cumbria, LA14 1HR
Eurotestconsult Limited	Ireland	Clonminan Industrial Estate, Portlaoise, County Laois, Ireland
Everard (Guernsey) Ltd	Guernsey	4th Floor, West Wing, Trafalgar Court, Admiral Park, St Peter Port, Guernsey, GY1 2JA
Fender Care Benelux B.V.	Netherlands	Torontostraat 20, 3197 KN, Rotterdam Botlek, Netherlands
Fender Care Limited	United Kingdom	Fisher House, PO Box 4, Barrow in Furness, Cumbria, LA14 1HR
Fender Care Marine (Gibraltar) Limited	Gibraltar	28 Irish Town, Gibraltar
High Technology Sources Limited	United Kingdom	Fisher House, PO Box 4, Barrow in Furness, Cumbria, LA14 1HR
James Fisher (Crewing Services) Limited	United Kingdom	Fisher House, PO Box 4, Barrow in Furness, Cumbria, LA14 1HR
James Fisher (Guernsey) Limited	Guernsey	4th Floor, West Wing, Trafalgar Court, Admiral Park, St Peter Port, Guernsey, GY1 2JA
James Fisher (Shipping Services) Limited	United Kingdom	Fisher House, PO Box 4, Barrow in Furness, Cumbria, LA14 1HR
James Fisher And Sons Plc	United Kingdom	Fisher House, PO Box 4, Barrow in Furness, Cumbria, LA14 1HR
James Fisher Defence Italy	Italy	Via Giulio Caccini, 100198, Rome, Italy
James Fisher Defence Sweden Aktiebolag	Sweden	Rindovagen, Rindo Vastra, 185 41 Vaxholm, Sweden
James Fisher Eiendom AS	Norway	Finnestadsvingen 23, 4029 Stavanger, Norway
James Fisher Everard Limited	United Kingdom	Fisher House, PO Box 4, Barrow in Furness, Cumbria, LA14 1HR
James Fisher Marine Services Limited	United Kingdom	Fisher House, PO Box 4, Barrow in Furness, Cumbria, LA14 1HR
James Fisher MFE Limited	United Kingdom	Fisher House, PO Box 4, Barrow in Furness, Cumbria, LA14 1HR
James Fisher NDT Limited	United Kingdom	Fisher House, PO Box 4, Barrow in Furness, Cumbria, LA14 1HR
James Fisher Norway AS	Norway	Finnestadsvingen 23, 4029 Stavanger, Norway
James Fisher Nuclear Limited	United Kingdom	North Meadows, Oldmeldrum, Inverurie, Aberdeenshire, AB51 0GQ
James Fisher Offshore Limited	United Kingdom	North Meadows, Oldmeldrum, Inverurie, Aberdeenshire, AB51 0GQ
James Fisher Subtech Group Limited	United Kingdom	Fisher House, PO Box 4, Barrow in Furness, Cumbria, LA14 1HR
James Fisher Testing Services (Ireland) Limited	Ireland	Unit D, Zone 5, Clonminam Business Park, Portlaoise, Co. Laois, Ireland



Name	Country	Registered Office
James Fisher Testing Services Limited	United Kingdom	Fisher House, PO Box 4, Barrow in Furness, Cumbria, LA14 1HR
JF Nuclear Limited	United Kingdom	Fisher House, PO Box 4, Barrow in Furness, Cumbria, LA14 1HR
JF STS (Guernsey) Ltd	Guernsey	4th Floor, West Wing, Trafalgar Court, Admiral Park, St Peter Port, Guernsey, GY1 2JA
JFD Domeyer GmbH	Germany	Konsul-Smidt-Str. 15, 28217, Bremen, Germany
JFD Limited	United Kingdom	North Meadows, Oldmeldrum, Inverurie, Aberdeenshire, AB51 0GQ
Mojo Maritime France	France	3 rue de France Comte, CS50311, Hauts de Quimpcanpoix, 5103, Cherbourg, France
Prolec Limited	United Kingdom	Fisher House, PO Box 4, Barrow in Furness, Cumbria, LA14 1HR
James Fisher Asset Information Services Limited	United Kingdom	Fisher House, PO Box 4, Barrow in Furness, Cumbria, LA14 1HR
RMSPumptools Limited	United Kingdom	Fisher House, PO Box 4, Barrow in Furness, Cumbria, LA14 1HR
Scan Tech AS	Norway	Finnestadsvingen 23, 4029 Stavanger, Stavanger, PO BOX 738, Norway
Scan Tech Personell AS	Norway	Finnestadsvingen 23, 4029 Stavanger, Stavanger, PO BOX 738, Norway
Scan Tech Product Personell AS	Norway	Finnestadsvingen 23, 4029 Stavanger, Stavanger, PO BOX 738, Norway
Scantech Offshore Limited	United Kingdom	Fisher House, PO Box 4, Barrow in Furness, Cumbria, LA14 1HR
Strainstall UK Limited	United Kingdom	Fisher House, PO Box 4, Barrow in Furness, Cumbria, LA14 1HR