GDPR EMPLOYEE MONITORING STATEMENT

The Company has various communications and computer systems to which you have access in the normal course of your job duties, including e-mail, the Internet, messaging systems, telephones (including Company mobile phones and personal mobile phones which are used to access our systems for work purposes) and voicemail. The Company reserves the right to monitor and record any use that you make of our systems (including IT use and your use of social media on the Internet), both during routine audits or random spot checks and in specific cases where a problem is suspected. Further information about how the Company undertakes monitoring is set out in our Information & Communications Policy, Social Media/Networking Guidelines, Mobile Equipment Policy and CCTV Policy, all of which are contained in the Employee Handbook. The Company is committed to being transparent about how and why you are monitored.

We will only monitor and record any use that you make of our systems where we have a lawful basis for doing so. This will normally be where we need to do so to perform your employment contract, we need to comply with a legal obligation, or where such monitoring is necessary for our legitimate interests (and your interests or your fundamental rights and freedoms do not override our interests).

The business purposes for such monitoring, which confirms our legitimate interests, are to:

- establish the existence of facts, e.g. in response to a client or customer complaint
- ascertain compliance with regulatory or self-regulatory requirements, practices or procedures
- assess your standards of performance and conduct and promote productivity and efficiency
- investigate or detect any unauthorised use of the systems
- ensure the security of the systems and networks and their effective operation
- ensure the smooth running of the business by checking whether there are any relevant business communications that need to be dealt with, e.g. if you are absent for any reason
- ensure that the Company's rules, policies and procedures are being complied with
- record transactions
- promote client and customer satisfaction
- ensure that the systems are not being used for any unlawful purpose or activities that may damage the Company's business or reputation
- make sure there is no unauthorised use of the Company's time, e.g. if you have been sending and receiving an excessive number of personal communications or spending an excessive amount of time viewing websites that are not work related

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- perform effective internal administration
- ensure that inappropriate, restricted or blocked websites are not being accessed and that offensive or illegal material is not being viewed, sent, downloaded or circulated
- ensure that all employees are treated with respect and dignity at work, by discovering and eliminating any material that is capable of amounting to unlawful harassment
- protect the privacy of personal data, trade secrets and sensitive or confidential Company information and ensure there is no breach of confidentiality or data protection provisions.

You must comply with the terms of any communications and computer systems policies that the Company may have in place from time to time. These include the Company's Information & Communications Policy, Social Media/Networking Guidelines, Mobile Equipment Policy and CCTV Policy, all of which are contained in the Employee Handbook.

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